

Illinois Peer Exchange: Planning and Environment Linkages (PEL) SUMMARY REPORT

Date: December 10–11, 2018
Host Agency: Illinois Department of Transportation
Location: Springfield, Illinois
Participating Agencies: Colorado Department of Transportation
Illinois Department of Natural Resources
Illinois Department of Agriculture
Illinois Department of Transportation
Illinois State Toll Highway Authority
Iowa Department of Transportation
Indiana Department of Transportation
FHWA Illinois Division
FHWA Iowa Division
FHWA Indiana Division
FHWA Office of Planning
FHWA Office of Project Development and Environmental Review
FHWA Resource Center
Quad Cities Metropolitan Planning Organization
U.S. Army Corps of Engineers
U.S. Coast Guard
U.S. Department of Transportation – Volpe Center



Photo by: U.S. DOT Volpe Center

This report summarizes the December 10–11, 2018, Planning and Environment Linkages (PEL) peer exchange held in Springfield, IL, sponsored by the Federal Highway Administration (FHWA) Office of Planning and the Office of Project Development and Environmental Review.

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BACKGROUND

The following report summarizes a PEL peer exchange coordinated by the Office of Planning, Environment, and Realty and held in Springfield, Illinois, on December 10–11, 2018. The purpose of the event was to discuss approaches and effective practices for planning and environment linkages. PEL is a collaborative and integrated approach to transportation decision-making that 1) considers environmental, community, and economic goals early in the transportation planning process, and 2) uses the information, analyses, and products developed during planning to inform the environmental review process. By fostering a coordinated approach towards planning and project development, PEL supports the selection and implementation of transportation investments that both reflects community needs due to an active agency engagement and public involvement process and are sensitive to the environment. PEL can help transportation agencies achieve efficient environmental review and permitting timelines, which is important to decision-makers and the public. Using PEL can create higher quality, more efficient, predictable, and integrated transportation planning and environmental review processes, and can ultimately accelerate project delivery. PEL helps make planning and the environmental review process more effective by promoting a comprehensive view of decision-making. It encourages collaboration among a variety of stakeholders and fosters the early and continuous involvement of environmental, regulatory, and resource agencies in the planning process. Through this lens, agencies are better equipped to determine project priorities and make more informed transportation choices that meet mobility, environmental, and community needs. PEL uses transportation planning to inform the environmental review process required under the National Environmental Policy Act (NEPA).¹

INTRODUCTION

The Federal Highway Administration (FHWA) Illinois Division and the Illinois Department of Transportation (IDOT) hosted the workshop in coordination with FHWA Office of Planning, Office of Project Development and Environmental Review, and Resource Center for a PEL peer exchange in Springfield, Illinois. The Colorado Department of Transportation (CDOT) served as the peer for this peer exchange. Attendees hailed from across the state and shared their views on introducing PEL to their process. The workshop was attended by representatives from Illinois, Iowa, Colorado, , and Indiana. One of the main goals was to discuss using PEL to enhance coordination between IDOT, Iowa DOT, metropolitan planning organizations (MPO), and resource agencies. Over 80 staff, including resource and other agencies, participated. Participants included: U.S. Army Corps of Engineers, U.S. Coast Guard, Illinois Department of Natural Resources, Illinois Department of Agriculture, Illinois State Toll Highway Authority, State historic and cultural resources staff, Quad Cities MPO, Colorado DOT, Indiana DOT, and Iowa DOT.

¹ https://www.environment.fhwa.dot.gov/env_initiatives/pel.aspx

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Discussion Topics on Day 1

Presenters provided the group with information on Day 1 of the peer exchange that consisted of FHWA and CDOT staff discussing how to advance PEL approaches. Pre-workshop survey results were reviewed, which encouraged discussion to identify the status, potential agency collaboration, and opportunities and challenges of the PEL approach in Illinois. Facilitated discussion occurred to share information about PEL approaches and best practices and to raise awareness of current and emerging innovative practices in Colorado and Illinois. Day 2 was reserved for large group discussions that focused on project specific work in Illinois, coordination with Iowa, and using the PEL approach for an upcoming bridge project on I-80 over the Mississippi River and the approaches to the bridge.

Peer Exchange Funding

This peer exchange was funded through the Second Strategic Highway Research Program (SHRP2) product [Expediting Project Delivery \(C19\)](#).² C19 is aimed at accelerating planning and environmental review processes for transportation projects. This product identifies 24 strategies for addressing or avoiding 16 common constraints to accelerating project delivery. These strategies represent innovative approaches to improve transportation decision-making that result in better projects and environmental outcomes. Applying these proven strategies saves time by allowing agencies to anticipate and reduce project delays in a collaborative manner with key partners and stakeholders.

This document summarizes the peer exchange. The agenda is available in Appendix A and the list of participants is available in Appendix B. Additional resources related to the content discussed during the peer exchange is available in Appendix C. Presentations referenced in this event summary are available upon request.

² https://www.fhwa.dot.gov/goshrp2/Solutions/All/C19/Expediting_Project_Delivery

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PEER EXCHANGE SUMMARY

Day 1: Information Exchange

Welcome

FHWA Illinois Division Planning and Programming Development Manager Jon-Paul Kohler and Illinois DOT Location and Environment Section Chief Scott Stitt opened the peer exchange by welcoming participants and discussing the importance of coordination and collaboration to improve the environmental review process and expedite project delivery in Illinois.

Pre-Workshop Survey Results

Peer exchange Facilitator Rob Ayers, Environment Program Specialist at the FHWA Resource Center, provided a summary of responses from a pre-workshop survey. The survey was distributed prior to the peer exchange to identify the current status of PEL in Illinois, potential opportunities for agency collaboration, and opportunities and challenges of the PEL approach. Survey results showed that most survey respondents had prior involvement with environmental assessments, feasibility studies, and carrying forward feasibility study analysis into the NEPA process; and only some respondents self-reported prior experience with PEL. A summary of the pre-workshop survey results is available in Appendix D.

Mr. Ayers provided an overview of the peer exchange and reviewed the meeting agenda. Mr. Ayers introduced PEL and noted that while Illinois participants may not be using PEL terminology, they have been using PEL planning products when they use relevant information from the planning process to inform NEPA. Mr. Ayers stressed that the PEL approach is flexible and can be used to make planning decisions to inform the environmental review process.

Question and Answer

- Q:** How can you ensure that everyone has communicated effectively and is on the same page regarding preferred alternatives? For example, say that a Metropolitan Planning Organization (MPO) completed a study of a large area of which NEPA has been completed for a portion of that study area. If the public involvement and alternatives were completed as part of NEPA but do not align with the MPO study, how would you rectify this issue?
- A:** The more we can understand what was completed in planning (the alternatives, the environmental and natural cost, and other factors) and use the information from planning (if well-documented) the more effective and efficient communication we can have during NEPA. This will save us time or at the very least make sure we understand what the planners were thinking. If the planners engage resource agencies and environment staff, the environmental community can give good feedback and point out any potential fatal flaws during planning. Likewise, in NEPA, if we understand what the community was

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thinking, what agencies thought, that helps inform our decisions. If we coordinate more, folks can understand how both planning and environment came to their decisions.

FHWA HQ: What is PEL?

Marisel Lopez-Cruz from the FHWA Office of Project Development and Environmental Review and Jody McCullough from the FHWA Office of Planning delivered a presentation on what PEL is, how PEL can accelerate project delivery, background information on PEL, the benefits of PEL, and regulatory information on PEL approaches. PEL represents a collaborative and integrated approach to transportation decision-making that considers benefits and impacts of proposed transportation system improvements to the environment, community, and economy during the transportation planning process.

Statutory authority for PEL has changed over time and was further refined through the Fixing America's Surface Transportation (FAST) Act in 2015. Codified in [23 USC 168](#),³ this statutory authority for PEL outlines:

- The lead and cooperating agencies' roles
- Conditions to adopt or incorporate by reference a planning product
- Concurrence of the lead and cooperating agencies if the planning product is necessary for a cooperating agency to issue a permit, review, or approval
- General conditions that planning products must meet to be used in NEPA

The statutory authority for PEL provided in [23 USC 139\(f\)\(4\)](#)⁴ provides requirements for eliminating alternatives from further consideration if they were previously studied in planning.

PEL uses the information, analysis, or products developed during planning to inform the environmental review process, including the National Environmental Policy Act of 1969 (NEPA) process. Use of PEL is not required for project development; however, if it is used, PEL planning products (planning analysis and/or planning decisions), including development of purpose and need and elimination of unreasonable alternatives, may be adopted or incorporated by reference as long as these products meet NEPA requirements. Transportation planning activities undertaken as part of the planning process prior to the initiation of NEPA are eligible for Planning (PL) and State Planning and Research (SPR) funds, which is a major benefit of the PEL process. Additional benefits of PEL include reduced duplication, cost and time savings, enhanced community involvement, and improved relationships and coordination.

Ms. McCullough noted that many of the conditions for PEL are already completed as part of the normal transportation planning process. She reviewed a number of general considerations for

³ <https://www.law.cornell.edu/uscode/text/23/168>

⁴ <https://www.law.cornell.edu/uscode/text/23/139>

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early in the process, which may make it easier to meet the conditions for planning products to be carried forward into NEPA, including developing cooperative relationships, sharing publicly available information, having reliable data, developing and using reasonable methodologies, establishing sufficient documentation, and engaging FHWA Division or Federal Transit Administration (FTA) Region Offices.

Regulation and Legislation

PEL is referenced in both planning and environment statute, regulation, and guidance. The Council on Environmental Quality (CEQ) [40 U.S.C 1500.5](#)⁵ provides regulation on the process of implementing NEPA. The CEQ regulations include incorporating NEPA into early planning and the incorporation by reference of information that will “cut down on bulk.” [23 USC 168](#) and [139\(f\)](#),⁶ allows FHWA and FTA, as NEPA lead agencies, to use the results or decisions of State DOTs, Metropolitan Planning Organizations (MPOs), or public transportation operator led corridor and subarea planning studies in the environmental review process under NEPA so long as these results meet NEPA requirements.

Adoption of planning products in NEPA is subject to requirements established by MAP-21 and amended by the FAST Act as codified in 23 USC 168 and 139. Adoption of planning products or incorporation by reference can occur under PEL if (1) the ten conditions set forth in 23 USC 168(d) are met, or (2) the six statutory conditions for elimination of an unreasonable alternative are met as outlined in 23 USC 139(f)(4)(E)(ii) (see Appendix E). As long as conditions are met under either of these statutes, the ability to use planning products in NEPA is preserved throughout the environmental review process. Many of the conditions for PEL are completed during the normal transportation planning process. However, there are oversight responsibilities that field staff must ensure are adhered to for planning products to be viable for use in the environmental review process.

Alternatively, if a State is interested in incorporating PEL to their planning process, corridor and subarea studies as discussed in [23 CFR 450.212\(a\)-\(c\)](#) and [23 CFR 450.318\(a\)-\(d\)](#)⁷ can be used to produce a wide range of analyses or decisions for FHWA/FTA review, consideration, and possible adoption in the NEPA process for an individual transportation project.

It is important to note that planning activities are not considered a Federal action subject to review under NEPA. However, when planning products are used in NEPA, they may be subject to potential future litigation.

⁵ https://www.energy.gov/sites/prod/files/NEPA-40CFR1500_1508.pdf

⁶ <https://www.law.cornell.edu/uscode/text/23/168> and <https://www.law.cornell.edu/uscode/text/23/139>

⁷ https://www.ecfr.gov/cgi-bin/text-idx?SID=f91881132af3e9b3b9063733f0ae5378&mc=true&node=se23.1.450_1212&rgn=div8

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One Federal Decision

[Executive Order 13807](#)⁸ Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure Projects requires Federal agencies to process environmental reviews and authorization decisions for “major infrastructure projects” as One Federal Decision (OFD) and sets a government-wide goal of reducing, to two years, the average time for each agency to complete the required environmental reviews and authorization decisions for major infrastructure projects, as measured from the date of publication of a notice of intent to prepare an environmental impact statement. The benefits of PEL support the goals of Executive Order 13807, which emphasizes early and ongoing coordination, concurrent agency reviews with timely permitting and agency decisions, and issuing one federal decision document (the Record of Decision) to the maximum extent practicable. Figure 1 shows the PEL Coordination Chart for FHWA major infrastructure projects as outlined in the OFD Working Agreement.

U.S. Department of Transportation Federal Highway Administration							38
<h2>One Federal Decision & PEL</h2>							
Pre-NOI Early Coordination	2 YEARS					90 Days	
Public/Agency involvement: i. Draft Purpose & Need ii. Screen preliminary alternatives iii. Draft schedule/coordination plan iv. Analysis methodologies v. Identify potential environmental impacts vi. Eliminate unreasonable alternatives	NOI (30 days)	Identify Preferred Alternative	Publish DEIS w/Preferred Alternative (45 days)	Publish FEIS/ROD	FEIS/ROD wait period (30 days)	Participating & Coordinating Agencies complete all pending decisions/permit approvals	
Section 404/Section 10 Permit Pre-Application Coordination - Wetland delineations - Alternatives analysis and impact areas - Avoidance and minimization measures - Potential compensatory mitigation options	Concurrence Points	Submit Application	30-day public notice comment period + 10 days written comments; concurrent public hearing(s)	USACE prepares draft ROD	USACE issues ROD		

Figure 1. One Federal Decision & PEL Coordination Chart

⁸ https://www.environment.fhwa.dot.gov/nepa/oneFederal_decision.aspx

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Additional resources for PEL include [Guidance on Using Corridor and Subarea Planning to Inform NEPA](#)⁹ and [FHWA's PEL Question and Answer](#).¹⁰ FHWA recommends documenting planning-level analysis that can be used to inform NEPA. The level of documentation needed depends on how the information will be used in NEPA. The most robust documentation must be provided where the goal is to make a decision in planning that will be accepted with no further analysis in NEPA. The [Planning/Environmental Linkages Questionnaire](#)¹¹ can be used as a tool to support robust documentation efforts while conducting a corridor study or PEL study.

CDOT: PEL Study Framework and Resources

Introduction

CDOT leads a PEL program that primarily focuses on conducting larger-scale PEL studies. The CDOT PEL approach was developed in coordination with FHWA to provide guidance on the PEL process in Colorado. The PEL process represents an approach to transportation decision making that considers environmental, community, and economic goals early in the planning stage and carries them through project development, design, and construction. A PEL study can lead to a seamless decision-making process that accomplishes the following:

- Minimizes duplication of effort
- Promotes efficient and cost-effective solutions and environmental stewardship
- Reduces delays in project implementation¹²

The program focuses on fostering agency outreach, environmental scoping, and mitigation opportunities.

Overview

CDOT PEL Program Manager Sean Brewer presented an overview on CDOT's PEL program. CDOT has conducted 20 PEL studies since 2008. For CDOT, the perspective on PEL is focused on construction. The goals are to create a study with a prioritized list of independent projects, establish baseline data on environmental constraints, build relationships with stakeholders, and identify potential funding. Mr. Brewer noted that the PEL process is flexible and can be used to make project or planning decisions. Project decisions might include developing the purpose and need, recommending one or more refined alternatives to be evaluated in future NEPA processes, identifying stakeholders and issues of potential concern, prioritizing future projects, or developing key components for future analysis. Planning decisions may include determining what financial measures are needed (such as tolling) or what type of improvement, including modes, might meet transportation needs. The PEL process is often conducted before NEPA,

⁹ https://www.environment.fhwa.dot.gov/env_initiatives/pel/corridor_nepa_guidance.aspx

¹⁰ <https://www.fhwa.dot.gov/hep/guidance/pel/pelfaq16nov.cfm>

¹¹ <https://www.fhwa.dot.gov/innovation/everydaycounts/edc-1/PEL-questionnaire.cfm>

¹² <https://www.codot.gov/programs/environmental/planning-env-link-program/pel-handbook-january-2016>

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before project construction funding is identified, and before problems are known or solutions have been considered. Before a PEL study is conducted, a pre-scoping process determines the reason for and expected outcomes of a PEL study, including why the study is being conducted and what question(s) will be addressed. If a program or project is likely to have federal involvement in the future, a PEL is a good tool to help streamline future NEPA processes. Completing a PEL, however, does not guarantee federal funding. A variety of outcomes can result from the PEL process: a specific project may be identified to advance into project development and NEPA; a set of improvements could be identified with recommendations for priorities to address transportation needs over a longer term; or the process might suggest that no immediate projects should be advanced because the needs do not warrant immediate action, or the controversy, costs, or environmental impacts associated with the project(s) are too high. PEL studies can be and are often used as a tool to prioritize improvements. For example, a PEL study for a corridor could result in the identification of multiple potential projects (such as capacity improvements (within) the corridor and intersection improvements) that can be prioritized for implementation. PEL studies conducted for projects provide context for future NEPA decisions, such as creating a basic description of the environmental setting, deciding on methodologies for analysis, and identifying programmatic level mitigation for potential impacts most effectively addressed at a regional or state level. The PEL process can also recommend the class of NEPA process required for future projects and can support the use of NEPA streamlining tools, such as CDOT's Environmental Assessment (EA) Template.

PEL studies provide transportation and environmental context and can be used to make planning decisions, such as program or project financing, including tolling options, or modal decisions about what modes might meet transportation needs. A PEL study can also be used for planning analyses, such as travel demands, regional development and growth, local land use analysis, population and employment analysis, documenting natural and built environmental conditions, and identifying resources of concern and potential cumulative effects. Planning decisions and planning analyses can help set the stage for future projects by contributing to the understanding of needs, logical termini, and/or improvement alternatives.”

Figure 2 displays CDOT's project development phase.

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What is PEL? CDOT Perspective.

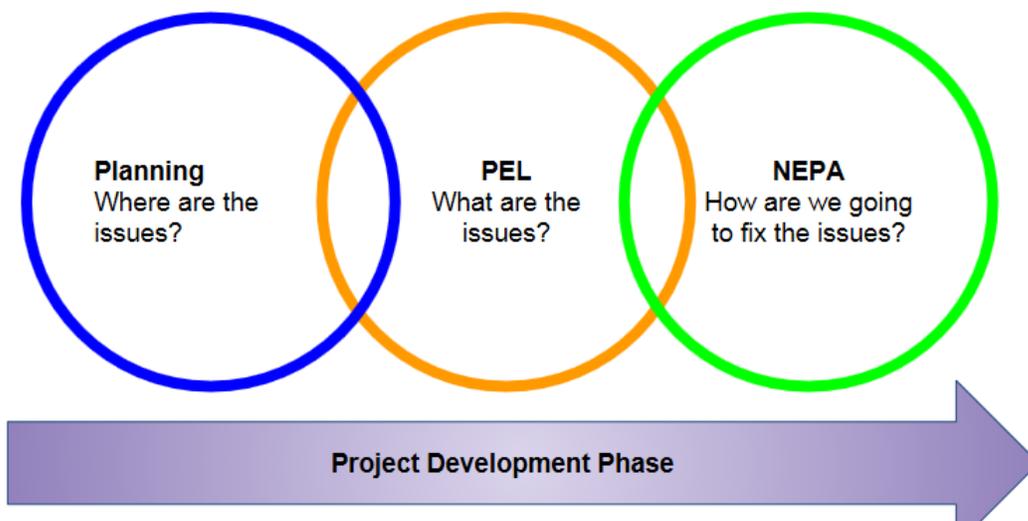


Figure 2. CDOT Project Development Phase

CDOT's [PEL Handbook](#)¹³ is a primary reference for conducting PEL studies. The handbook incorporates lessons learned, current and best practices, and new legislative requirements. Agency participation in PEL is voluntary and non-binding; if an agency chooses not to provide input, the PEL products can still be carried forward into the NEPA process with the recognition that additional coordination will likely be required during the NEPA process. In addition to the handbook, CDOT developed a video to further introduce and explain the PEL approach.¹⁴

¹³ <https://www.codot.gov/programs/environmental/planning-env-link-program/pel-handbook-january-2016/view>

¹⁴ <https://www.youtube.com/watch?v=PaXq23f59m4>

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Public Outreach

CDOT holds public meetings to introduce a PEL study and to identify various committees, technical working groups, and other smaller groups that will interface with the public. CDOT uses several PEL outreach techniques, including corridor tours, steering committee meetings, and listening sessions.

CDOT PEL Approach

Mr. Brewer clarified that before conducting a PEL study, it is important to determine that it is the right tool and that there is a need for the study to be completed. A PEL study provides a “head start” to the NEPA process, streamlining NEPA document preparation and allowing for incorporation by reference into the NEPA process. CDOT uses the PEL approach when a PEL study can help identify stakeholders and issues of potential concern or define and recommend one or more alternatives for transportation improvements.

In Colorado, data from PEL studies can be used directly in NEPA if not more than 5 years old. If older than 5 years, the data will need to be revisited, updated, and supplemented during NEPA, as necessary.

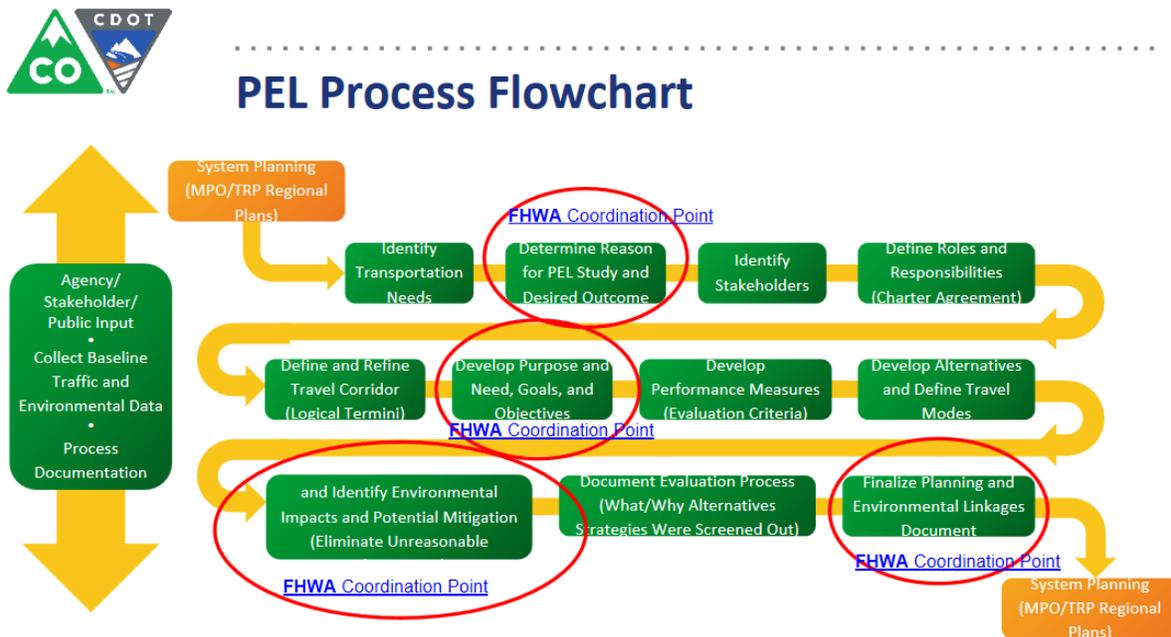


Figure 4. CDOT PEL Process Flowchart

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Figure 4 shows the PEL process as CDOT has implemented it. This flowchart also shows the four key points where FHWA coordination occurs to ensure acceptance of the PEL study and to ensure that PEL study results can be carried forward into the formal NEPA process. Coordination, documentation, and data collection occur throughout the process.

Project Examples

Mr. Brewer provided examples of several projects in which a PEL study was completed, including the WestConnect PEL study for a 32-mile long corridor. The PEL study provided a framework and process for CDOT to work with coalition agencies to build a tailored program of projects that can then move into environmental documentation, design, and construction. The study was an opportunity to leverage the benefits of the PEL process by clearly documenting strategic project decisions regarding short and long term improvements to the WestConnect Corridor. The final PEL study report for the [WestConnect Corridor](#) is listed on CDOT's website.¹⁶

Question and Answer

Q: I have a problem going through a build/no-build process with our partners. How does CDOT do that?

A: Through the PEL study, you have partners engaged for several months to years. They feel more confident after being involved through most of the process. Most alternatives have been evaluated through the PEL process. These conversations happen prior to NEPA, so a lot of work gets done before you enter NEPA.

Q: During PEL, what level of environmental survey are you doing during that process?

A: Complete your environmental scan but keep in mind that it is not NEPA so you can scale back the level of detail.

Q: At what stage do you start public involvement in your PEL?

A: Public involvement is more flexible in PEL as it is in NEPA. As an agency, we do our best to have an open and transparent process. We have a kickoff meeting with stakeholders and we leverage a lot of NEPA requirements, including scoping, to tell people what we're studying and why. CDOT has open project comments on our website, so comments can be provided at any time.

Q: How do you combat potential image that CDOT has presented a predetermined solution?

A: PEL preserves a reasonable range of alternatives. We don't narrow down to a preferred alternative because that limits you when you go into NEPA. With a PEL, you can present a range of alternatives.

¹⁶ <https://www.codot.gov/library/studies/westconnect-coalition-pel-study>

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Q: Did CDOT change their organizational structure because of PEL?

A: No. There's a PEL program manager and NEPA program manager.

Q: When CDOT began PEL was there a period where you had to sell it to your resource agencies?

A: Yes. We have the [Transportation Environmental Resource Council \(TERC\)](#)¹⁷ which gets together and talks about upcoming projects and the PEL process. We also have an MOU between CDOT and the resource agencies for the PEL process in Colorado. There are a lot of tools to help with the coordination of the agencies.

Q: What are your criteria for deciding whether it is a PEL study or EA?

A: Do you have construction money? If you do, go do NEPA. If you don't, consider the PEL approach.

¹⁷ <https://www.codot.gov/programs/environmental/transportation-environmental-resources-council-terc>

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Day 2: Adopting PEL Approaches to IDOT Processes and Projects

Illinois is at the heart of the country's interstate highway system. This vast system consists of coast-to-coast interstates I-80 and I-90 and I-70, which extends from the east coast to Utah. These major corridors are joined by multiple north-south corridors including I-39, I-55, and I-57, and additional east-west corridors such as I-24, I-64, and I-74. Participants from IDOT, Iowa DOT, FHWA division offices, resource agencies, and other agencies engaged in a facilitated discussion about how IDOT and partner agencies will implement a PEL approach for the I-80 bridge project. The project is located in the Quad Cities, a two-state metropolitan area located along the Mississippi River at the eastern Iowa-western Illinois border. The largest city in the Quad Cities is Davenport, Iowa, with a population of nearly 100,000. The Quad Cities is centrally located in proximity to Minneapolis to the north, St. Louis to the south, Chicago to the east, and Des Moines to the west. The Quad Cities metropolitan planning area is centrally located in the bi-state region, which is comprised of three Illinois counties and two Iowa counties.¹⁸ Many resource agencies with responsibilities in this region engaged in the discussion. The U.S. Coast Guard, U.S. Army Corps of Engineers, U.S. Environmental Protection Agency (EPA), Illinois Department of Natural Resources and others are responsible for the Mississippi River and adjacent resources. Using information and resources from Day 1's presentations on PEL and CDOT's PEL approach, participants engaged in a large group discussion about (1) potential PEL study components for the I-80 bridge project, (2) the purpose and need of the project, (3) the logical termini for the project, and (4) the range of alternatives to be considered as a part of the PEL study.

I-80 Project Overview

Becky Marruffo, IDOT District 2 Studies and Plans Engineer, provided an introduction to the I-80 bridge project. The project centers on the I-80 bridge that crosses the Mississippi River and connects Illinois to Iowa. Because it is a bi-state bridge, Illinois and Iowa share responsibility for the bridge, but IDOT is the lead agency for this bridge.

¹⁸ <http://bistateonline.org/transportation/quad-cities-metro-planning/2012-11-13-20-19-45/quad-cities-metro-lrtp-long-range-transportation-plan>

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Figure 5. Image provided by IDOT. Map of the I-80 Bridge Project and Surrounding Areas

The scope of the study area and the exact termini of the project area have not yet been determined; making this determination is one goal of the PEL process. The areas surrounding the bridge contain some potential complicating factors for the project, including interchanges on both sides of the bridge, as well as the nearby I-80/I-88/Old IL-2 interchange. The bridge was originally constructed in 1966 and the deck was widened in 1990 and 1995. The bridge experiences recurring condition issues, which have posed significant problems in the past, including a two-month closure of eastbound lanes in 2010 for emergency repairs. The bridge carries about 20% of all vehicular traffic across the river in the Quad Cities area, including a significant portion of the region's freight traffic.

In addition to the Illinois PEL study for this area, Iowa DOT is in the process of completing an I-80 planning study for Scott County just across the river. Iowa DOT is likely to start the NEPA process on an environmental assessment (EA) in 2019. Iowa DOT must have the consultants

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under contract by the end of January 2019, with a three-year project timeline and an estimated completion date of January 2021.

IDOT chose to undertake a PEL process for the I-80 bridge for several reasons. First, Illinois and Iowa DOTs agree that a bridge replacement need is anticipated. Continued annual expenditures for maintenance, fracture critical structural components, and obsolete geometric configuration all contribute to the anticipated need for bridge improvements. However, because of limited engineering funding and no future funding yet identified, starting the NEPA process is not feasible at this time. Therefore, IDOT has chosen a PEL process to complete preliminary tasks that can be carried forward into the NEPA process at a future date when funding is available.

Question and Answer

Q: What are the natural resource or wildlife concerns?

A: There are eagles, falcons, and mussels in the immediate area of the bridge. There is a bald eagle refuge adjacent to the bridge, but it will not be touched or impacted. There do not appear to be any species present that could not be addressed around as a part of the project.

Large Group Discussion

After hearing about the project overview and study area, the group transitioned into a large group discussion facilitated by Mr. Ayers, with additional feedback provided by Mr. Brewer. First, the group discussed objectives for the discussion, which included:

- Identifying the purpose and need for the study
- Discussing logical termini
- Discussing the range of alternatives

The group also discussed potentially considering what NEPA class of action would be appropriate coming out of the PEL study. Citing CDOT's experience with PEL, Mr. Brewer noted that CDOT typically decides a class of action toward the end of a PEL study, when they have more information from the planning products produced as a part of the PEL study. He also stated that typically CDOT's PEL studies lead to EAs or categorical exclusions (CE) rather than environmental impact statements (EIS).

Following this class of action discussion, a question was asked about why a PEL study was chosen for the I-80 bridge project. One of the reasons IDOT has chosen to complete a PEL study for this project is that there is no construction funding, which is one circumstance under which CDOT has found it useful to complete a PEL study, which may make it easier to identify future funding opportunities to complete NEPA and the project. The prospect of the Illinois state legislature passing a new capital plan in the new year was raised, but participants pointed out that the project would not be ready for this plan, as NEPA will not be complete. It was reiterated that IDOT had identified and allocated limited funding for the PEL study, and that the

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consultant team to complete the PEL study had already been selected and was in attendance at the peer exchange.

Mr. Brewer noted that a benefit of a PEL study that CDOT has identified is the ability to identify real needs. CDOT has successfully used PEL to look at larger study areas surrounding projects, which has unlocked funding to complete projects by providing documentation of transportation needs that can then be shared with elected officials and other policymakers. He also noted that a PEL study provides a good opportunity to build relationships and trust, making the NEPA process easier and less prone to conflict.

The group then discussed scoping the PEL study. A number of issues were raised by the group, including access, safety, operations, public involvement, agency engagement, and the Iowa EA. Mr. Ayers summarized that an identified challenge was defining the study area, which would need to be defined at some point. Potential overlap with the Iowa EA study area would need to be reconciled and close coordination would be needed to ensure that any potential conflicts in recommendations would be accounted for.

Following the scoping discussion, the group moved into identifying needs. Through this discussion, it was established that prior reports, including a bridge inspection report and a report documenting that the bridge could not be rehabilitated, were reliable pieces of information that could be brought into the PEL process to document a replacement need for the bridge. The PEL study consultants noted that they intend to look within the corridor at the curvature of the roadway and the elevation to identify roadway deficiencies. It was also noted that a lot of prior information relevant to the potential study area exists and that would facilitate conducting a PEL study. However, the quality of this information would need to be evaluated to determine whether it was of sufficient quality to be included in the subsequent NEPA process.

Discussion then moved on to safety. It was stated that, at this point in time, IDOT has raw data on traffic crashes but that further analysis has not yet been completed. Going into the PEL study, it was established that traffic analysis will need to be completed to determine whether the data identify safety problems along the corridor. Additionally, Quad Cities MPO maintains a travel demand model that provides data that can be used in the PEL study to identify future traffic demands and congestion, which may be related to the safety analysis of existing data.

Resuming the discussion after a lunch break, the group moved into a discussion of resource implications. The group identified some endangered species that will require consideration—particularly bald eagles and mussels. The group also identified that existing resources, such as a state database of archaeological sites that could be used to identify Section 4(f) resources within the area. Because of a lack of good state tracking of historic properties, additional research and study will need to be done during the PEL study to identify any historic properties in the study area.

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Other potential areas requiring study were identified for the PEL study. Tribal consultation, railroad interaction, and bicycle/pedestrian concerns were specifically identified as areas that will require consideration in the PEL study. Environmental justice communities were also identified as in need of consideration. Keith Moore of the FHWA Resource Center shared a resource called [EJ Screen](#),¹⁹ provided by the U.S. EPA, which could be used in the PEL study to identify environmental justice communities.

Through the discussion, participants identified the following resources that can be carried forward into the I-80 PEL study:

- A bridge inspection report for the I-80 bridge that documents bridge condition
- Preliminary assessments of geometry
- Crash data for the study area that can be used by the project consultant in a crash analysis
- Travel demand model and analysis already conducted by Quad Cities MPO

After concluding that the large group discussion had given IDOT and the FHWA IL Division a starting point to build on as they undertake the I-80 bridge PEL study, Mr. Ayers concluded the discussion by reviewing relevant PEL authorities under existing statutes and regulations. He discussed that there are multiple authorities for PEL and carrying PEL activities forward into the NEPA process and highlighted three of the major authorities including: adoption ([23 USC 168](#) and [139\(f\)](#)),²⁰ incorporation by reference ([23 CFR 450.212\(a\)-\(c\)](#) and [23 CFR 450.318\(a\)-\(d\)](#)),²¹ and the standard incorporation of planning information into NEPA under the existing NEPA regulations. PEL is supported by a number of other authorities, including [23 CFR 450.212](#),²² [23 CFR 450.318](#),²³ [Appendix A of 23 CFR 450](#),²⁴ [23 USC 169](#),²⁵ [23 USC 134\(i\)\(2\)\(D\)](#),²⁶ [23 USC 135\(f\)\(4\)](#),²⁷ [40 CFR 1500.4\(i\)](#),²⁸ and [40 CFR 1502.21](#).²⁹ He reviewed that each of these authorities have different requirements to carry forward information into the NEPA process, and that there is flexibility to move among the authorities.

¹⁹ <https://www.epa.gov/ejscreen>

²⁰ <https://www.law.cornell.edu/uscode/text/23/168> and <https://www.law.cornell.edu/uscode/text/23/139>

²¹ <https://www.ecfr.gov/cgi-bin/text->

[idx?SID=f91881132af3e9b3b9063733f0ae5378&mc=true&node=se23.1.450_1212&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=f91881132af3e9b3b9063733f0ae5378&mc=true&node=se23.1.450_1212&rgn=div8)

²² <https://www.ecfr.gov/cgi-bin/text->

[idx?SID=f91881132af3e9b3b9063733f0ae5378&mc=true&node=se23.1.450_1212&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=f91881132af3e9b3b9063733f0ae5378&mc=true&node=se23.1.450_1212&rgn=div8)

²³ <https://www.law.cornell.edu/cfr/text/23/450.318>

²⁴ https://www.law.cornell.edu/cfr/text/23/appendix-A_to_part_450

²⁵ <https://www.law.cornell.edu/uscode/text/23/169>

²⁶ <https://www.law.cornell.edu/uscode/text/23/134>

²⁷ <https://www.law.cornell.edu/uscode/text/23/135>

²⁸ <https://www.law.cornell.edu/cfr/text/40/1500.4>

²⁹ <https://www.law.cornell.edu/cfr/text/40/1502.21>

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CLOSING REMARKS

Mr. Ayers thanked everyone for providing their input and feedback to inform the I-80 PEL study.

Janel Veile, project coordinator for IDOT, thanked everyone for coming to the peer exchange. She also thanked Mr. Brewer in particular for serving as the peer for the peer exchange, as well as the many IDOT and FHWA Illinois Division staff who assisted in the planning of the peer exchange.

The outcomes drafted by peer participants were:

- Agreement to move forward with further coordination
- The scope of the PEL study would be coordinated
- The resource agencies were interested in further involvement
- The Quad Cities MPO will share data and analysis with the partners

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Appendix A – Agenda

DAY 1 – Monday, December 10, 2018	
Location: Illinois Department of Natural Resources Lake Level A, B & C Conference Rooms One Natural Resources Way Springfield, Illinois 62702	
TIME	SESSION – Orientation and Introduction to Content
10:00 – 10:15 am	Opening Remarks <ul style="list-style-type: none"> — Jon-Paul Kohler, FHWA Illinois Division, Acting Assistant Division Administrator — Scott Stitt, IDOT Location and Environment Section Chief
10:15 – 11:00 am	Introductions and Pre-Workshop Survey Results <ul style="list-style-type: none"> — Rob Ayers, FHWA Facilitator
FHWA PEL Overview	
11:00 – 11:45 am	Defining PEL/Q&A <i>- FHWA will provide an overview of the legislative basis for PEL and review primary examples of planning products (analyses and decisions)</i> <ul style="list-style-type: none"> — Marisel Lopez-Cruz and Jody McCullough, FHWA PEL Team
11:45 – 1:00 pm	Lunch
IDOT Overview	
1:00 – 1:30 pm	IDOT Planning and Environmental Processes and Tools <i>- Overview of IDOT's planning process</i> <ul style="list-style-type: none"> — Michael Vanderhoof, Office of Planning and Programming <i>- Overview of IDOT's environmental review process</i> <ul style="list-style-type: none"> — John Sherrill, Office of Highway Project Implementation
Peer Overview	
1:30– 2:30 pm	Peer CDOT Overview of PEL Approaches <ul style="list-style-type: none"> — Sean Brewer, CDOT PEL Program Manager and NEPA Specialist
2:30 – 3:00 pm	Peer and Participants Q&A <ul style="list-style-type: none"> — Rob Ayers, FHWA Facilitator — Sean Brewer, CDOT PEL Program Manager and NEPA Specialist
3:00 – 3:15 pm	Break
Discussion	
3:15 – 4:00 pm	Participant Dialogue: Framing the Discussion on PEL Benefits and Challenges, and Roles and Responsibilities <i>Facilitated discussion to dig deeper into the materials presented by IDOT, FHWA Headquarters, and the peer.</i> <ul style="list-style-type: none"> — Rob Ayers, FHWA Facilitator
4:00 – 4:30 pm	Preview of Day 2 <ul style="list-style-type: none"> — Rob Ayers, FHWA Facilitator

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DAY 2 – Tuesday, December 11, 2018	
Location: Illinois Department of Natural Resources Lake Level A, B & C Conference Rooms One Natural Resources Way Springfield, Illinois 62702	
TIME	SESSION – Adopting PEL Approaches to IDOT Processes and Projects
8:00 – 8:30 am	Networking
8:30 – 9:00 am	Introductions and Day 1 Review — Rob Ayers, FHWA Facilitator
9:00 – 10:00 am	Overview of the study area and the transportation facilities within the study area. — Becky Marruffo, IDOT District 2 Studies and Plans Engineer
10:00 – 10:15 am	— Break
Breakout Session	
10:15 – 11:30 am	Large Group Discussion <i>As a large group, discuss questions that have been provided by IDOT and the Division Office Prior to the event. The discussion should be organic based on questions, experience, examples, need for I-80 PEL, and what IL learned from Day 1.</i> — Sean Brewer, CDOT PEL Program Manager and NEPA Specialist — Rob Ayers, FHWA Facilitator
11:30 – 1:00 pm	Lunch
1:00 – 2:30 pm	Large Group Discussion <i>As a large group, discuss questions that have been provided by IDOT and the Division Office Prior to the event. The discussion should be organic based on questions, experience, examples, need for I-80 PEL, and what IL learned from Day 1.</i> — Sean Brewer, CDOT PEL Program Manager and NEPA Specialist — Rob Ayers, FHWA Facilitator
2:30 – 3:00 pm	Conclusion from Large Group Discussion <i>As a large group, highlight the importation thoughts, action items, direction for I-80 PEL, etc.,</i> — Rob Ayers, FHWA Facilitator
3:00 – 4:00 pm	Next Steps — Rob Ayers, FHWA Facilitator
Closing Remarks	
4:00 – 4:30 pm	Closing Remarks — Janel Veile, IDOT Location and Environment Section — Becky Marruffo, IDOT District 2 Studies and Plans Engineer — Andrew Brinkerhoff, FHWA IL Division Office — Jan Piland, FHWA IL Division Office

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Appendix B – Participant List

First	Last	Agency
Sean	Brewer	Colorado DOT
Nathan	Grider	DNR
Marisel	Lopez-Cruz	FHWA Headquarters
Jody	McCullough	FHWA Headquarters
Andrew	Brinkerhoff	FHWA Illinois Division
Craig	Cassem	FHWA Illinois Division
Chris	Fraley	FHWA Illinois Division
Matt	Fuller	FHWA Illinois Division
Jon-Paul	Kohler	FHWA Illinois Division
James	Kyte	FHWA Illinois Division
Jan	Piland	FHWA Illinois Division
Omar	Qudus	FHWA Illinois Division
Michael	Smart	FHWA Illinois Division
Mike	Staggs	FHWA Illinois Division
JD	Stevenson	FHWA Illinois Division
Heidi	Thomas	FHWA Illinois Division
Betsy	Tracy	FHWA Illinois Division
Michelle	Allen	FHWA Indiana Division
Darla	Hugaboom	FHWA Iowa Division
Rob	Ayers	FHWA Resource Center
Keith	Moore	FHWA Resource Center
Stephen	Wells	HG Consult
Scott	Marlow	IDOT
Steven	Schilke	IDOT
Cindy	Stafford	IDOT
Mike	Vanderhoof	IDOT
Dwayne	Ferguson	IDOT BDE
Kate	Gleason	IDOT BDE
Vince	Hamer	IDOT BDE
Felecia	Hurley	IDOT BDE
Vince	Madonia	IDOT BDE
Paul	Niedernhofer	IDOT BDE
John	Sherrill	IDOT BDE
Janel	Veile	IDOT BDE
William	Raffensperger	IDOT BLRS
Chris	Byars	IDOT District 1
Kimberly	Murphy	IDOT District 1
Vanessa	Ruiz	IDOT District 1

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Brad	Cushman	IDOT District 2
Mat	Dobie	IDOT District 2
Faith	Duncan	IDOT District 2
Deana	Hermes	IDOT District 2
Babak	Jamali	IDOT District 2
Becky	Marruffo	IDOT District 2
Mark	Nardini	IDOT District 2
Heather	Rhodes	IDOT District 2
Steven	Robery	IDOT District 2
Kris	Tobin	IDOT District 2
David	Alexander	IDOT District 3
Dave	Broviak	IDOT District 3
Wayne	Phillips	IDOT District 3
Brian	Rennecker	IDOT District 3
Rich	Dotson	IDOT District 4
Nancy	Fasig	IDOT District 5
Brian	Hogan	IDOT District 5
Bart	Sherer	IDOT District 5
Jason	Stults	IDOT District 5
Jennifer	hunt	IDOT District 8
Kevin	Jemison	IDOT District 8
Brian	Macias	IDOT District 8
Sarah	Wiszkon	IDOT District 8
Valerie	Rolla	IDOT District 9
Charles	Stein	IDOT District 9
Christopher	Schmidt	IDOT OPP
Justin	Dillard	Illinois Dept. of Natural Resources
Aimee	Lee	Illinois Tollway Authority
Rocco	Zuccherro	Illinois Tollway Authority
Laura	Hilden	Indiana DOT
DeeAnn	Newell	Iowa DOT
Magliola	Robert	Iowa DOT
Danny	Zeimen	Iowa DOT
Tony	Pakeltis	Parsons
Mark	Peterson	Parsons
Madison	Burke	U.S. DOT Volpe
Travis	Crayton	U.S. DOT Volpe
Kirsten	Brown	USACE
Liz	Pelloso	USEPA
Mike	Sedlacek	USEPA

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Appendix C – Additional Resources

FHWA:

- [Environmental Review Toolkit: PEL Website](#)³⁰ which includes additional resources and publications

CDOT:

- [CDOT webpage on TERC including PEL Partnering Agreement](#)³¹
- [CDOT PEL Program Webpage](#)³²
- [State Highway 66 PEL - Existing Conditions Report/Environmental Scan](#)³³
- [PEL Handbook](#)³⁴

³⁰ https://www.environment.fhwa.dot.gov/env_initiatives/pel.aspx

³¹ <https://www.codot.gov/programs/environmental/transportation-environmental-resources-council-terc/terc-and-partnerships.html>

³² <https://www.codot.gov/programs/environmental/planning-env-link-program>

³³ <https://drive.google.com/file/d/0B5mssZC3CAYYeEk1cm9VVWc5TzQ/view>

³⁴ <https://www.codot.gov/programs/environmental/planning-env-link-program/pel-handbook-january-2016/view>

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Appendix D – Summary of Survey Results

Question 1: What is your experience level with Planning and Environmental Linkages (PEL) approaches, including PEL studies?

Summarized responses:

- Very experienced = 0 (0%)
- Somewhat experienced = 4 (16.67%)
- Somewhat inexperienced = 5 (20.83%)
- Inexperienced = 15 (62.5%)

Question 2: Do you anticipate any challenges for your agency/office if you participate in a PEL study (training needed, staffing issues, management support, review expectations, etc.)?

Summarized responses:

- Yes = 9 (37.5%)
- No = 15 (16.5%)

Question 3: If you see challenges, what are some examples?

Summarized responses:

- Resource Agency buy in on decisions made prior to NEPA beginning.
- Lengthened timelines for overall project studies because of additional reviews, reviews with unclear purpose for the reviewer, and reviews that are not consistent within agencies, let alone between agencies.
- Staff time and staff expertise
- Unfamiliarity with process, completing PEL with limited funding.
- Need for training and fact that we do very few planning only type studies.
- Expertise needed for some of the work will need to be outsourced.
- PEL doesn't seem that different than CSS.
- Curious to see if it's implemented the same (via FHWA) in different states in the same region.

Question 4: What has been your involvement in a feasibility or corridor study?

Summarized responses:

- Very involved = 9 (37.5%)
- Somewhat involved = 10 (41.67%)
- Not involved = 5 (20.83%)

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Question 5: If involved in a feasibility or corridor study, were the results able to be carried forward to NEPA?

Summarized responses:

- Yes = 15 (75%)
- No = 5 (25%)

Question 6: If the results were not able to be carried forward to NEPA, why not?

Summarized responses:

- No funding for project.
- Resource Agencies had not been involved in these pre-NEPA decisions and required us to revisit when we got to NEPA stage.
- Did not meet NEPA requirements.
- There was no feasible cost effective solution to get the results that were desired.
- Were not done in a NEPA way.
- Lack of interest and funding.

Question 7: What has been your involvement in preparing an Environmental Impact Statement (EIS) or Environmental Assessment (EA)?

Summarized responses:

- Very involved = 9 (39.13%)
- Somewhat involved = 8 (34.78%)
- Not involved = 6 (26.09%)