



# **Purpose and Need Statement**

## Revised Draft

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## Introduction

The Federal Highway Administration (FHWA) and Nevada Department of Transportation (NDOT) are preparing a “Purpose and Need Statement” for the I-11 Corridor Tier 1 Environmental Impact Statement (EIS). The intent of this memo is to begin that process and provide background information to consider as the Purpose and Need Statement is prepared. Tiered EISs are exempt from the One Federal Decision (OFD) Framework for the Environmental Review and Authorization Process for Major Infrastructure Projects under Executive Order 13807; however, the I-11 Corridor Tier 1 Environmental Impact Statement (EIS) will seek to be prepared in compliance with OFD requirements and all other applicable regulations, guidance, and policies.

The purpose and need are fundamental components of the National Environmental Policy Act (NEPA) process and provide the basis for identifying, evaluating, and screening corridor alternatives; the purpose and need will be key in identifying reasonable alternatives, and selecting either a Build or No Build alternative for I-11.

The Council on Environmental Quality (CEQ) regulations require an EIS to “briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action.” A clear, well-justified purpose and need section explains to the public and decision-makers that the expenditure of funds is necessary and worthwhile and that the priority the project is being given relative to other needed highway projects is warranted.

The goal in drafting the Purpose and Need Statement should be to define as sharply as possible the fundamental reasons why the project is being proposed, expressed as a desired transportation outcome. Without a well-defined, well-established and well-justified purpose and need, it will be difficult to determine which alternatives are reasonable, prudent, and practicable, and it may be impossible to dismiss the No-Build alternative.

## Key Issues to Consider

In developing the purpose and need, there are a number of factors to consider. The American Association of State Highway and Transportation Officials prepared guidance for *Defining the Purpose and Need and Determining the Range of Alternatives for Transportation Projects*<sup>1</sup>. In it they outline a series of questions to help guide the lead agencies and stakeholders through the process of preparing the project’s purpose and need, as summarized below. These items will be considered at the time the purpose and need is fully developed for incorporation into the Draft EIS.

### Considering Relevant Legislation and Planning Decisions

- What legislation (federal, state, or local) is relevant to defining the project purpose?

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<sup>1</sup> AASHTO. 2016. *Defining the Purpose and Need and Determining the Range of Alternatives for Transportation Projects*. <https://environment.transportation.org/pdf/programs/ph07-2.pdf>.

- *Federal legislation, including the Moving Ahead for Progress in the 21st Century Act (MAP-21) and the Fixing America's Surface Transportation Act (FAST Act) will be included*
- Are there any policies in state or metropolitan transportation plans that are relevant to defining the purpose?
- Did the transportation planning process produce a preliminary Purpose and Need Statement for this project?
  - *Refer to the I-11 and Intermountain West Corridor Study*
- Has the transportation planning process produced data that can be used to support the purpose and need?
  - *Refer to the I-11 and Intermountain West Corridor Study and traffic and alternatives analysis currently underway for the Tier 1 EIS*
- Did the transportation planning process include a preliminary screening of alternatives?
  - *Refer to the I-11 and Intermountain West Corridor Study and traffic and alternatives analysis currently underway for the Tier 1 EIS*
- Have the conditions been met for adopting planning-level decisions or analyses for use in the NEPA process?

## Determining and Documenting the Need for the Project

- What data is available to evaluate the transportation needs in the project area?
- Are there any data gaps? If so, how will those gaps be addressed?
- Has any of the data become stale?
- How will the supporting information for the purpose and need be documented?
- What are the key assumptions underlying the travel demand forecasts and are they realistic?
- If concerns have been raised regarding the travel forecasting model, how have they been addressed?
- What visual aids would be helpful in conveying the key elements of the purpose and need?

## Defining the Project Purpose

- Is there a single purpose of the project, or does the project serve multiple purposes?
- If there are multiple purposes, are some more important than others? What are the true “drivers” of the project?
- What criteria will be used to determine whether an alternative meets the project purposes?
- Have the project purposes changed over time? If so, how will this change be explained?
- Is the project purpose stated clearly, succinctly, and consistently throughout the NEPA document?

## Developing and Applying Alternatives Screening Criteria

- What criteria will be used to determine whether an alternative meets the purpose and need?

- Aside from the purpose and need, what other factors will be considered in the screening process?
- How will the alternatives screening process be documented?
- Are there any circumstances that warrant reconsideration of previous screening decisions (e.g., new data)?

## Coordinating with Agencies and Involving the Public

- If an EIS is being prepared, what opportunity for involvement will be provided for agencies and the public in developing the purpose and need and determining the range of alternatives?
- Is there an interagency agreement that requires coordination and/or concurrence from other agencies at key milestones, such as the purpose and need and the range of alternatives?
- If an Environmental Assessment is being prepared, will there be any agency coordination or public involvement regarding the purpose and need and the range of alternatives?
- How will agency coordination and public involvement efforts be documented?
- If commenters have raised concerns about the purpose and need and/or the range of alternatives, how have those concerns been addressed?

## Project Background

A number of previous and current actions have helped to provide a framework within which the purpose and need for the NDOT I-11 Tier 1 EIS can be developed. These are summarized below.

### **Boulder City/US 93 Corridor Study (Boulder City Bypass)**

The Record of Decision for the *Boulder City/US 93 Corridor Study Final EIS and Section 4(f) Evaluation* was approved in 2005. This document identified a recommended alternative that was later reevaluated in 2009, 2011, 2013, and 2014. When construction was completed in August of 2018 the Boulder City Bypass was designated the first segment of I-11 to open to traffic. Note that the I-11 designation of this highway segment may be subject to change depending on the preferred corridor alternative identified at the conclusion of NDOT's I-11 Corridor Tier 1 EIS process.

### **Moving Ahead for Progress in the 21st Century Act (MAP-21)**

The U.S. Congress, with its passage of the *Moving Ahead for Progress in the 21st Century Act* (MAP-21) in 2012, identified U.S. Highway 93 (US 93) from Phoenix, Arizona, to Las Vegas, Nevada, as a High Priority Corridor in the National Highway System and designated it as the future I-11. The Boulder City Bypass that developed out of the Boulder City/US 93 Corridor Study was designated as the first segment of I-11, subject to change as noted above (note that construction was completed in 2018).

## **I-11 and Intermountain West Corridor Study**

In 2014, NDOT and the Arizona Department of Transportation (ADOT) jointly completed the *I-11 and Intermountain West Corridor Study* (IWCS) that encompassed a broad study area for the Intermountain West region from Mexico to Canada. The purpose of the IWCS was to determine whether sufficient justification exists for a new high-capacity priority transportation corridor, and if so, to establish the likely potential routes. The study established the corridor vision, developed justification, and defined an implementation plan to move forward. It was intended to provide a high-level overview of the corridor opportunities and foundation for subsequent corridor alternative and environmental studies.

The IWCS defined a “corridor vision” for the I-11:

*Serving the nation’s north-south, multimodal transportation needs from Mexico to Canada, the I-11 and Intermountain West Corridor will provide a vital multimodal connection between the Arizona Sun Corridor and Las Vegas. It is also envisioned to promote freight linkages between the new and expanding ports in Mexico and Canada, existing U.S. West Coast ports, and future inland ports and commerce centers crucial to distributing goods across North America. These linkages will stimulate the development of new crossroads, spurring community and economic development opportunities spanning the entire corridor. Effective inclusion of multimodal infrastructure elements, such as natural resources, power, telecommunication, freight rail, and potentially passenger rail, serve as the foundation of a stronger and more diversified economy for the Western U.S. The I-11 and Intermountain West Corridor will become a major, multimodal, north-south, transcontinental corridor through the Intermountain West.*

In addition, the IWCS identifies the following purpose:

*To provide an access-controlled, north-south transportation corridor that will connect important metropolitan areas and markets in the Intermountain West with Mexico and Canada to support improved regional mobility for people and freight, and provide enhanced opportunities for trade and economic development.*

## **Draft Tier 1 Environmental Impact Statement, Nogales to Wickenburg**

ADOT and FHWA continued to study the I-11 Corridor in Arizona through the preparation of the I-11 Tier 1 EIS. In April 2019, ADOT published the *Draft Tier 1 Environmental Impact Statement, Nogales to Wickenburg*.

An early step in preparing the Draft EIS was to demonstrate the transportation challenges and other needs that exist within the study area, an approximately 280-mile corridor between Nogales and Wickenburg. That effort demonstrated a clear Purpose and Need, and the study process identified and evaluated a range of alternatives to develop a solution to meet that purpose and need. The Purpose and Need Statement for I-11, based on key transportation-related issues identified in previous studies, was refined through agency coordination and public involvement during the project’s scoping process. As defined in the Draft EIS, the overall purpose of the I-11 Corridor is to:

- Provide a high-priority, high-capacity, access-controlled transportation corridor to serve population and employment growth;
- Support improved regional mobility for people and freight to reduce congestion and improve travel efficiency;
- Connect metropolitan areas and markets in the Intermountain West with Mexico and Canada through a continuous, high-capacity transportation corridor;
- Enhance access to the high capacity transportation network to support economic vitality; and
- Provide for alternate regional routes to facilitate efficient mobility for emergency evacuation and defense access.

The Draft Tier 1 EIS also identifies the problems, issues, and opportunities that support the need for a proposed transportation facility, which are:

- Population and employment growth
- Congestion and travel time reliability
- System linkages and regional and interstate mobility
- Access to economic activity centers
- Homeland security and national defense

While not part of the fundamental purpose for the proposed I-11 Corridor, other desirable outcomes, goals, or objectives are identified as:

- Provide the opportunity for multimodal use should needs arise in the future
- Support the protection of sensitive tourist attractions in accordance with applicable plans and policies
- Support the protection of the environment and cultural resources in accordance with applicable plans and policies
- Support coordination with other federal and state agencies to maintain the integrity of wildlife movement

## **Draft Purpose and Need Statement**

The purpose and need statement for the NDOT I-11 Tier 1 EIS should be largely consistent with the vision for the broader corridor and the purpose and need developed for the ADOT I-11 Corridor, since the envisioned ultimate facility would provide a north-south connection from Mexico to Canada. The Purpose and Need Statement and development of Chapter 1 (Purpose and Need) of the Draft Tier 1 EIS would be based on several data that describe the need that forms the foundation of the project. Based on further studies as the project advances, the problems, issues, and opportunities that are anticipated to support the need include, but may not be limited to:

- Population and employment growth
- Congestion and travel time reliability
- System linkages and regional and interstate mobility
- Improved access to economic activity centers

- Homeland security and national defense

The draft Purpose and Need Statement, based on the IWCS, the ADOT I-11 Draft EIS, and an initial understanding the needs is as described below.

*The purpose of the I-11 Corridor within the Las Vegas Valley is to:*

- *Provide a high-capacity, access-controlled transportation corridor;*
- *Provide the Congressionally-mandated link through the Las Vegas Valley for a continuous I-11 Corridor that connects major metropolitan areas and markets in the Intermountain West Corridor with Mexico and Canada;*
- *Support improved regional mobility for people and freight to reduce congestion and improve travel efficiency;*
- *Facilitate efficient mobility for emergency access, evacuation, and national defense;*
- *Enhance opportunities within the Las Vegas Valley for economic development; and,*
- *Improve access to activity centers within the Las Vegas Valley.*

Other desirable outcomes, goals, or objectives (that are not included in the Purpose and Need Statement, but may be part of the project objectives) include:

- Provide the opportunity for multimodal use should needs arise in the future
- Support the protection of the natural environment, recreation, and cultural resources in accordance with applicable plans and policies

As information is collected through stakeholder engagement, review of environmental and transportation conditions, and project scoping, the project Purpose and Need Statement is expected to be refined to reflect this additional input and understanding.