Interstate Access Justification Reports

PROCESS OVERVIEW & DELEGATION OF AUTHORITY

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Agenda

- Nebraska’s Interstate System
- What is an IAJR?
- Why is an IAJR Required?
- When is an IAJR Required?
- Understanding IAJR Delegation
- IAJR Process Overview
- Why Would NDOT Pursue IAJR Delegation?
- How will this benefit Nebraska?
- Why Now?

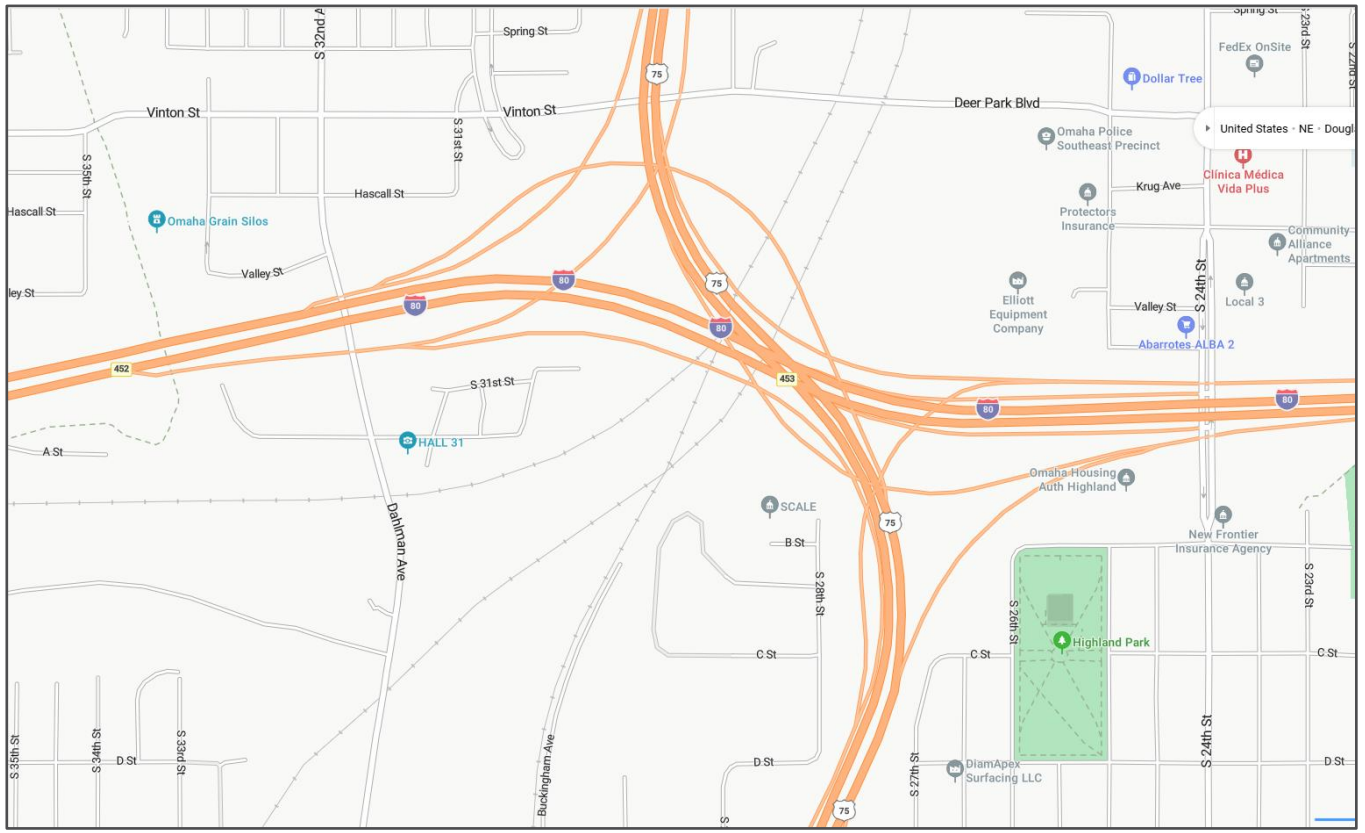


Nebraska's Interstate System

- 6 Interstates segments
  - Over 480 centerline miles
  - I-80 has over 455 miles
  - Remainder along I-76, I-180, I-680, I-480, I-129
- Access is only provided at interchanges
  - Economic Growth and Commerce
  - Financial and Time Savings
  - National Defense
  - Regional and Community Connectivity
- Highest design standards apply to this system of highways

Nebraska’s Interstate System

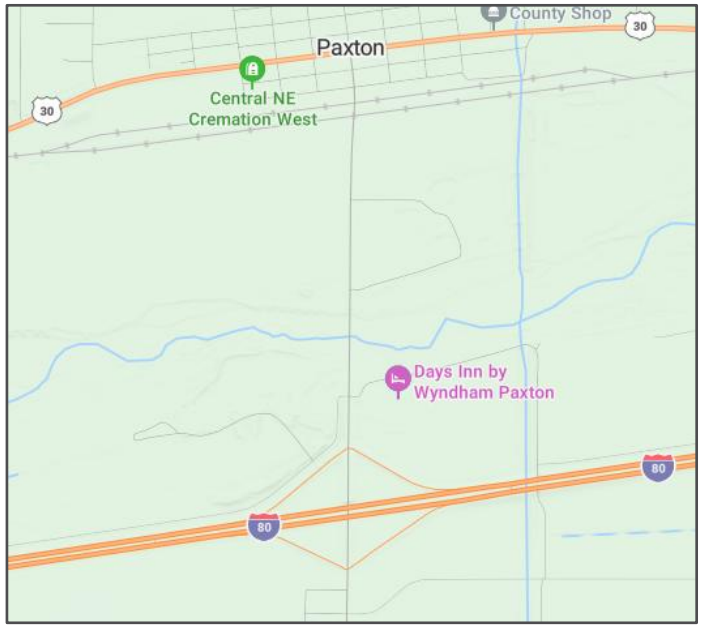
- 6 System Interchanges
  - I-80 / I-76
  - I-80 / US-77 South
  - I-80 / I-180
  - I-80 / I-680
  - I-80 / I-480 / US-75
  - I-480 / US-75

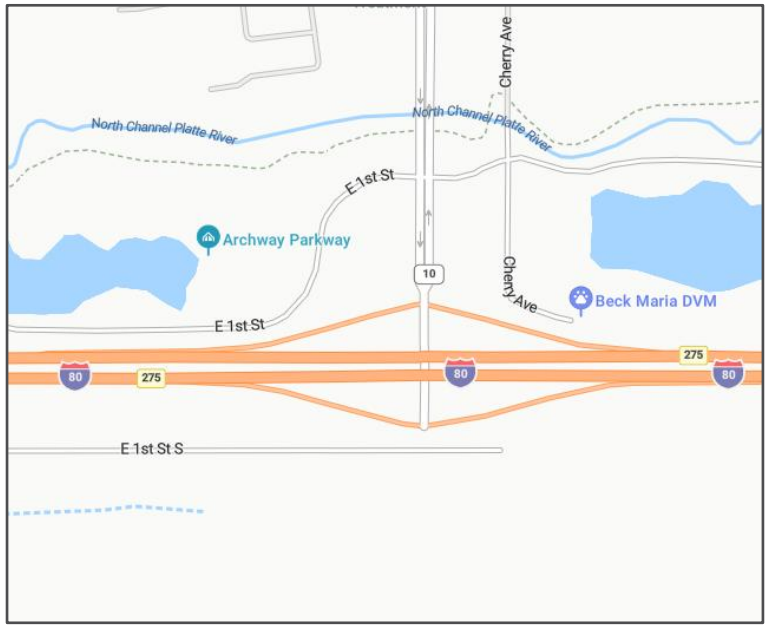


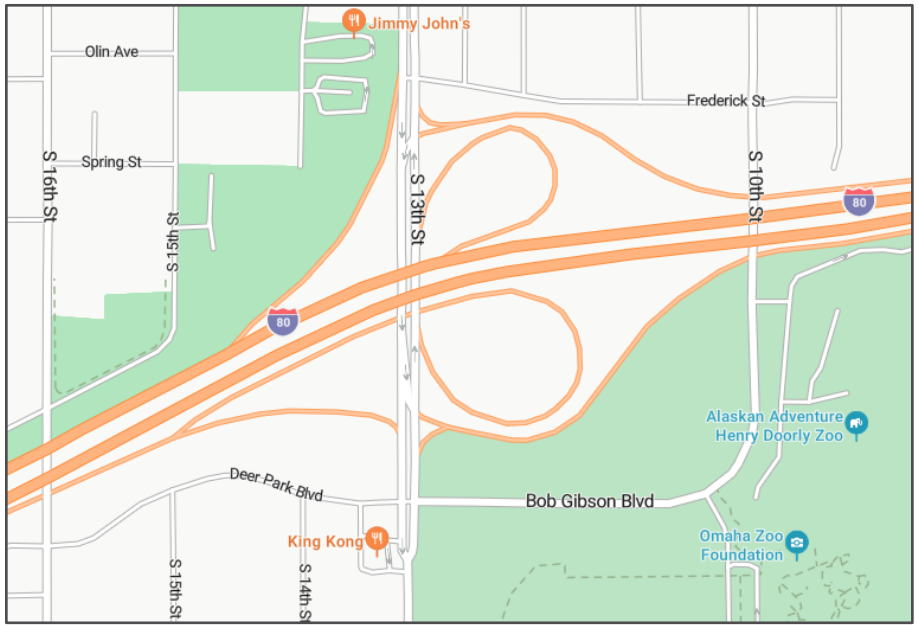
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Nebraska's Interstate System

- 90 Service Interchanges
  - Interstate / State Highway
  - Interstate / Local Road







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What is an IAJR?

- Standalone technical report that documents the **Safety, Operations, and Engineering (SO&E)** aspects of a proposed change in access to the Interstate System.

- Any proposed access modification constitutes a **Federal Action** requiring Federal Highway Administration (FHWA) approval and compliance with the National Environmental Policy Act (NEPA).



Why is an IAJR Required?

- Ensures an informed decision-making process

- Verifies that proposed access changes **preserve the integrity** of the Interstate system while considering:
  - Safety
  - Operations
  - Engineering and design standards
  - Impacts



When is an IAJR Required?

- **Proposed change in access**
  - New or modified freeway-to-freeway interchanges.
  - New or modified freeway-to-crossroad (service) interchanges.
  - Completion of basic movements at partial interchanges.
  - New locked gate access or abandonment of existing ramps/interchanges.

- **Some exclusions apply**
  - Minor modifications may only require consultation with FHWA
  - Some modifications are exempt from the IAJR requirement.



IAJR Process Overview

- **Step 1: Determine access change evaluation process**
- **Step 2: Methods & Assumptions Document**
- **Step 3: Technical Analysis & Alternative Screening**
  - Broad screening ➡ detailed evaluation
  - Traffic & Operations Analysis
  - Safety Analysis

The build alternatives must demonstrate that conditions will not be worse than the no-build alternative.



IAJR Process Overview

- **Step 4: Draft IAJR and SO&E Acceptability**
  - Consolidates preliminary design plans, traffic forecasts, operations and safety analysis, and conceptual signing plans into a standalone report.
  - Reviewed internally by NDOT Roadway Design and Traffic Engineering Divisions for quality and completeness.
  - **SO&E Acceptability Determination** will be made by NDOT in most instances once a Programmatic Agreement is in place.
- **Step 5: Final IAJR Approval**
- **Re-evaluation** *(if necessary)*



IAJR Process Overview

- **Final IAJR Approval Pathways**
  - **One-Step Process:** Final IAJR and SO&E determination are submitted together after NEPA is complete.
  - **Two-Step Process:** Allows FHWA to grant **Conditional Concurrence** on SO&E acceptability prior to NEPA completion.



Understanding IAJR Delegation

- Delegation is authorized under 23 USC 111(e) and 23 CFR 624.13 through a **Programmatic Agreement** between FHWA and NDOT.

- **Delegation** allows NDOT to make **Safety, Operations & Engineering (SO&E) acceptability determinations** on behalf of FHWA for some changes in access.



Understanding IAJR Delegation

- **Delegated Access Changes (NDOT SO&E Authority):**
  - New freeway-to-crossroad (service) interchanges.
  - Modifications to existing freeway-to-crossroad interchanges.
  - Completion of basic movements at freeway-to-crossroad partial interchanges.
- **Non-Delegated Access Changes (FHWA Retains SO&E Authority):**
  - All freeway-to-freeway interchanges, partial interchanges, locked gate access, and ramp abandonments.
- **Key Principle: FHWA retains final approval authority for ALL access changes**, regardless of SO&E delegation.



Understanding IAJR Delegation

- **Project Quality Control**
  - Project leads must complete a standardized Quality Control Checklist to verify compliance with all SOP parameters.
- **Annual Review & Reporting**
  - NDOT conducts an annual internal evaluation of delegated SO&E determinations within 3 months of calendar year-end.
  - NDOT submits an annual QC report to the FHWA Nebraska Division summarizing all processed access changes, quality control efforts, and implemented process improvements.
- **Record Retention:**
  - Final IAJR documents, SO&E determinations, and approval letters are maintained in NDOT's document system for at least **3 years**.



Understanding IAJR Delegation

- **FHWA approval** of standard operating procedures is complete.
- **Training modules** have been developed and made available on NDOT's website.
- **Draft Programmatic Agreement** has been submitted to FHWA for signature.
- Programmatic Agreement has a term of five years with option for additional five-year renewals.



Why would NDOT pursue IAJR Delegation?

- NDOT has **proven performance** with delegation
- **National Environmental Policy Act (NEPA) Assignment**
  - Categorical Exclusions (CEs) in 2018
  - Full NEPA Assignment (all classes of action) in 2026
- **Other environmental review processes** *(non-FHWA; e.g., T&E, S106)*
- **Benefits are clear**
  - Time and cost savings
  - Programmatic flexibility and localized decision-making
  - Legal standard remains unchanged – all of this without cutting corners



Why would NDOT pursue IAJR Delegation?

- **Streamlined Concurrent Reviews**
  - NDOT will have delegated authority for both NEPA approvals and SO&E determinations and can advance both tracts simultaneously.
- **Streamlined Final IAJR Approval by FHWA**
  - Objections must be received within **10 business days**. Lack of objection by FHWA will constitute approval.
- **Operational Autonomy and Efficiency**
  - NDOT is familiar with local corridor demands, regional travel patterns, and specific crossroad geometries. Delegation places decision-making authority closer to where the functions are performed.
- **Resource Optimization**
  - Delegation minimizes the administrative "back-and-forth" between NDOT and FHWA



How will this benefit Nebraska?

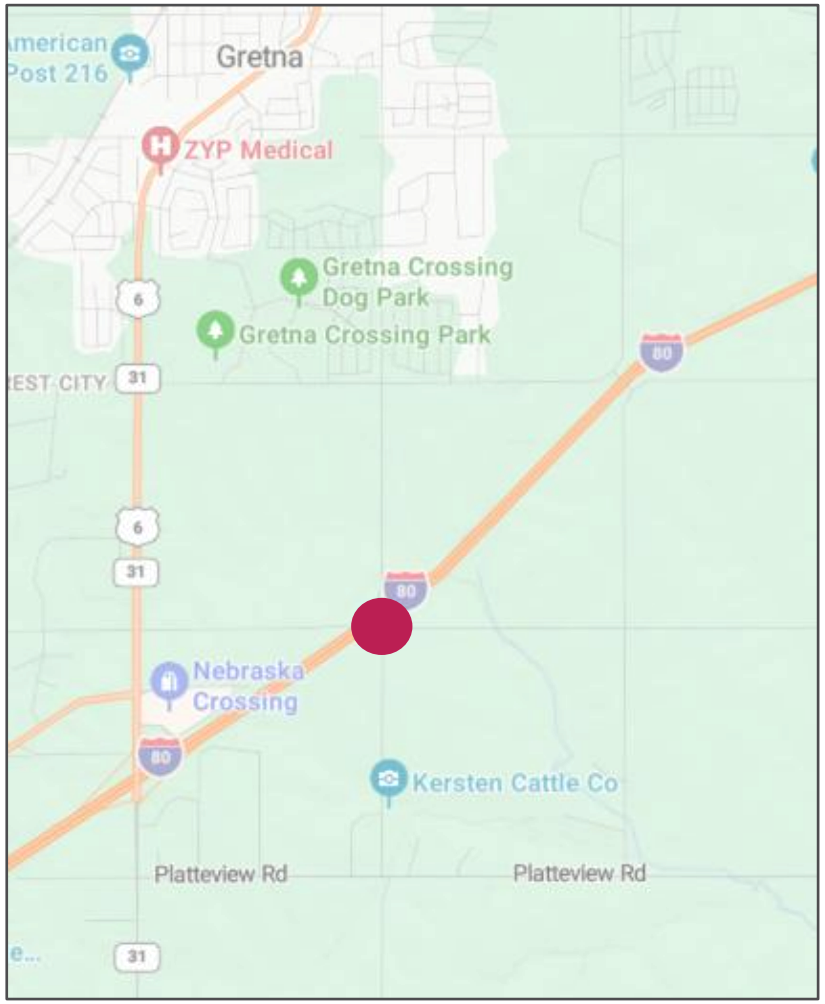
- **Improved responsiveness to changing and growing travel demands.**
  - Through all NDOT's delegation efforts and programmatic agreements, we are working to reduce the project delivery timelines.
  - Days = weeks = months
  - Project delivery becomes ***faster*** and ***more reliable***.
- **Improved responsiveness to public and private partners.**

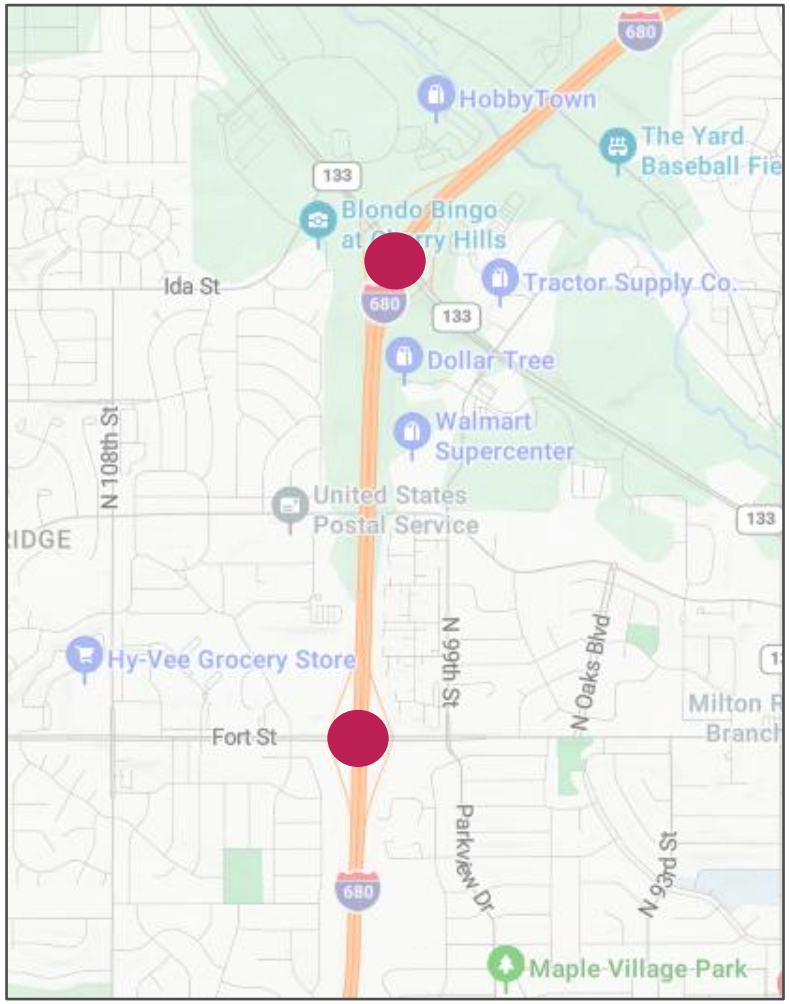


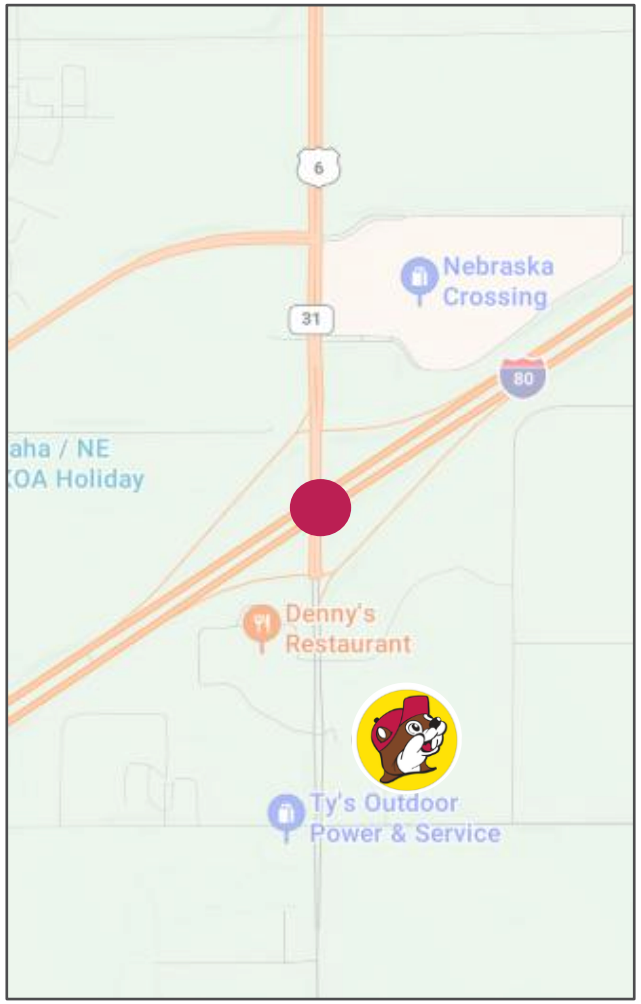
Why Now?

- **Recent and planned improvements**
  - Two IAJRs submitted to FHWA in past year
  - FHWA coordination on SO&E analysis for developer-driven interchange modification at I-80/N-31(Gretna)

- NDOT is actively using **creative financing models** to accelerate project delivery.







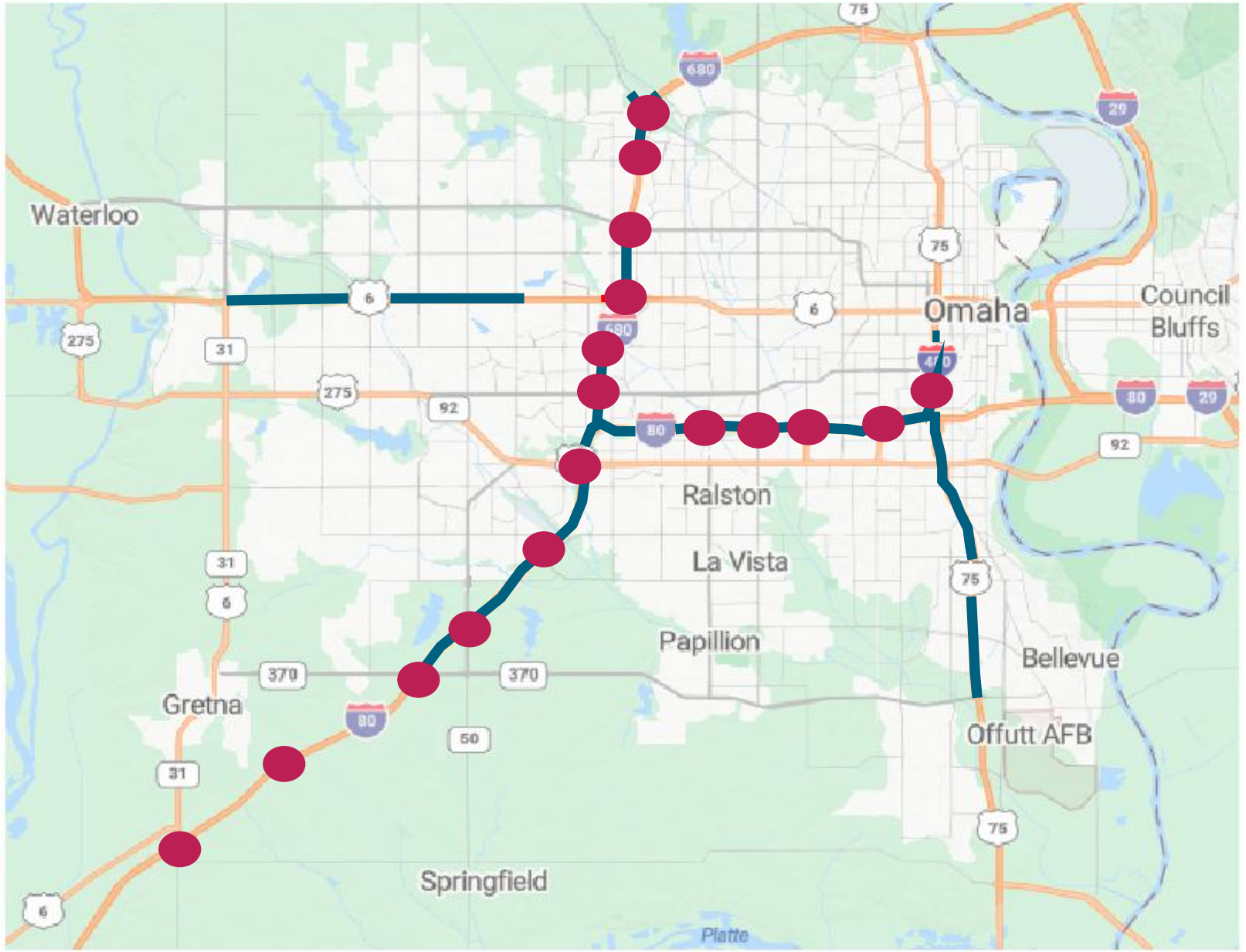
RECENT INTERCHANGE REVIEWS

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Why Now?

- **Metro Area Travel Improvement Study (MTIS)**
  - 20 years of improvements along I-80, I-680, I-480, US-6 and US-75
  - Over $1.5 billion in capital improvements planned
  - 17 interchanges on the interstate system affected



MTIS PROJECTS

INTERCHANGE LOCATIONS

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Why Now?

- **Other locations along I-80**
  - Could improves economic vitality of community
  - Increase attractiveness for new development



OTHER INTERCHANGE REQUESTS

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Becoming Better Partners.

Achieving *faster*, *more reliable* project delivery.

Leveraging local expertise.

Questions?

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