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June 25, 2019

Mr. Al Alonzi, PE
Division Administrator
Federal Highway Administration - Texas Division
300 East 8th Street, Rm 826
Austin, Texas 78701

RE: Statement of Interest - New Special Experimental Project (SEP-16) to Evaluate Proposals for Delegation of Certain Program-wide FHWA Responsibilities to States - Interstate Access Justification Reports

Dear Mr. Alonzi:

In accordance with 23 U.S.C 101, the Texas Department of Transportation (TxDOT) hereby notifies the Federal Highway Administration (FHWA) of our interest in participating in the New Special Experimental Project (SEP-16) to Evaluate Proposals for Delegation of Certain Program-wide FHWA Responsibilities to States. This project, announced by FHWA on September 19, 2018, document number 2018-20347, is to test and evaluate the delegation of program-level responsibilities of the Federal-Aid Highway Program (FAHP) to States, including the appropriate steps States should take to request to exercise delegated authority.

Summary of Proposal

TxDOT proposes to seek approval authority under 23 USC 111(e) for Texas Interstate Access Justification Reports (IAJR).

Reasoning for Proposal

TxDOT assuming applicable IAJR approval authority will save time and improve efficiency by removing an additional step of review, coordination, and approval.

Anticipated Resulting Improvement to TxDOT's Project Delivery

Resulting improvements will include a savings in time and resources needed to support project delivery. There will also be improved operational consistency within TxDOT, creating a single source of guidance, direction, and decision-making authority across TxDOT's 25 regional offices with respect to IAJRs. In addition, allowing IAJR decisions to be made closer to those responsible for project delivery and associated impacts will enhance ownership and accountability.

Experience with Project-Level Delegation

TxDOT has been working under NEPA assignment for almost four and a half years with great success. TxDOT has seen many overall improvements to project development and delivery as a result of this delegation, including:

- Faster environmental review and approval times;
- Improved program guidance, policies, and procedures;
- Improved understanding of the process for agencies, local governments, and the public;

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OUR MISSION: Through collaboration and leadership, we deliver a safe, reliable, and integrated transportation system that enables the movement of people and goods.

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- Improved training program;
- Improved program efficiencies; and
- Greater accountability through internal monitoring and FHWA program audits.

With respect to IAJs, TxDOT is actively enhancing policies and procedures to improve effective controls that maintain compliance with federal requirements. Specifically, TxDOT is leading and facilitating statewide trainings and workshops in coordination with FHWA, is actively involved in project-level early coordination meetings, and is developing Standard Operating Procedures for IAJs, along with templates and checklists that will set the standard for IAJ development and consistency across the state. TxDOT has demonstrated the ability to successfully work with FHWA as a partner on the improvements to IAJ controls and has demonstrated positive results.

TxDOT looks forward to working closely with FHWA during the application process on this exciting experimental project.

Sincerely,



James M. Bass
Executive Director