



## FDM 7-45-1 Additional or Revised Access to the Interstate Highway System

December 18, 2015

Changes in access to the Interstate Highway System are governed by an FHWA policy for evaluating requests for additional and revised access to the Interstate System. This policy is contained in the FHWA Policy Statement on Access to the Interstate System published August 27, 2009 in the Federal Register Volume 74, Number 165, Page 43743 to Page 43746. There is also a FHWA-Wisconsin Division Standard Operating Procedure titled "New or Revised Interstate Access Points" that provides additional guidance on the procedure for submitting a request.

This policy is applicable to new or revised access points to existing Interstate facilities regardless of the funding of the original construction or regardless of the funding for the new access points. Routes approved as a future part of the Interstate System under 23 U.S.C. 103(c)(4)(B) represent a special case because they are not yet a part of the Interstate System. Since the intention to add the route to the Interstate System has been formalized by agreement, any proposed new or significant changes in access beyond those covered in the agreement, regardless of funding, must be approved by FHWA.

The primary emphasis of the policy is protection for the operational safety and capacity of the Interstate System. Proposals for added or revised access to the Interstate must be based on serving regional traffic needs. The intent is to limit additional access to essential needs and not merely to serve the convenience of adjacent property interests or to solve local traffic problems by moving them onto the Interstate facility.

The following is list of the most common needs that are addressed by a change in access:

- Systems linkage or connectivity  
<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=30>
- Road user benefits  
<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=31>
- Access to areas currently not served  
<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=31>
- Address an existing congestion or safety problem  
<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=31>
- Prevention of future congestion or safety problems  
<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=32>

It is important to note that congressionally directed funding for a change in access has no bearing on consideration of an Interstate System Access Change Request. The approval of funding for a project does not change the requirements for consideration of a proposed change in access or acceptance by FHWA.

An Interstate Access Justification Report (IAJR) must be prepared and submitted as part of the Interstate System Access Change Request for all new points of access or revisions which involve interchange configuration. ([Attachment 1.1](#) details some of the information required for this evaluation.) These requirements apply regardless of the funding of the original construction or regardless of the funding for the new access points.

A change in access is considered by FHWA as any modification to the control of access right of way on the Interstate System. This includes locked gated access, access to ramps or collector-distributor roadways or other facilities that are functionally part of the Interstate System. Each entrance or exit point is considered to be an access point. Any additional access where there previously was none would be considered new access. Generally, revised access is considered to be a change in the interchange configuration that affects the operational characteristics of the Interstate System even though the actual number of points of access may not change. Replacing one of the direct ramps of a diamond interchange with a loop, or changing a cloverleaf interchange to a fully directional interchange are considered examples of revised access for the purpose of applying the FHWA policy.

Ramps providing access to rest areas, information centers, and weigh stations within the Interstate controlled access are not considered access points for the purpose of applying this policy. These facilities shall be accessible to vehicles only to and from the Interstate System. Access to and from these facilities and local roads

or adjoining property is prohibited. The only allowed exception is for access to adjacent publicly owned conservation and recreation areas if access to these areas is only available through the rest area, as allowed under 23 CFR 752.5(d).

If there is any question whether an Interstate System Access Change Request is required, contact the FHWA Wisconsin Division to determine the type of review and process to be considered.

All requests for new or revised access points on completed Interstate highways must closely adhere to the planning and environmental review processes as required in 23 CFR parts 450 and 771. The FHWA approval constitutes a Federal action and, as such, requires that the transportation planning, conformity, congestion management process, and the National Environmental Policy Act procedures be followed and their requirements satisfied. This means the final FHWA approval of requests for new or revised access cannot precede the completion of these processes or necessary actions.

To offer maximum flexibility, however, any proposed change in access can be submitted by WisDOT to the FHWA Wisconsin Division Office for a determination of engineering and operational acceptability. This flexibility allows agencies the option of obtaining this acceptability determination prior to making the required modifications to the Transportation Plan, performing any required conformity analysis, and completing the environmental review and approval process. In this manner, WisDOT can determine if a proposal is acceptable for inclusion as an alternative in the environmental process. This policy in no way alters the planning, conformity or environmental review and approval procedures as contained in 23 CFR parts 450 and 771, and 40 CFR parts 51 and 93.

An affirmative determination by FHWA of engineering and operational acceptability for proposals for new or revised access points to the Interstate System should be reevaluated whenever a significant change in conditions occurs (e.g., land use, traffic volumes, roadway configuration or design, environmental commitments). Proposals shall be reevaluated if the project has not progressed to construction within 8 years of receiving an affirmative determination of engineering and operational acceptability (23 CFR 625.2(a)). If the project is not constructed within this time period, an updated justification report based on current and projected future conditions must be submitted to FHWA to receive either an affirmative determination of engineering and operational acceptability, or final approval if all other requirements have been satisfied (23 U.S.C. 111, 23 CFR 625.2(a), and 23 CFR 771.129). Refer to link:

<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=32>

WisDOT is required to submit requests for proposed changes in access to the FHWA Wisconsin Division Office for review and action under 23 U.S.C. 106 and 111, and 23 CFR 625.2(a). The FHWA Division Office will ensure that all requests for changes in access contain sufficient information, as required in this policy, to allow FHWA to independently evaluate and act on the request. Guidance to assist with the implementation and consistent application of this policy can be accessed electronically through the FHWA Office of Infrastructure's Web page at:

<http://www.fhwa.dot.gov/programadmin/fraccess.cfm>

WisDOT is responsible for ensuring that the collection of all data, performance of all required analysis, and development of the required documentation is complete, correct and appropriate for the proposed change in access as agreed to in the coordination process.

See [Attachment 1.3](#) for a simplified flowchart of the Interstate System Access Change Request and Approval Process. See [Attachments 1.4](#) to 1.7 for more detailed flowcharts of the IAJR and IAJR PEOR process with recommended coordination meetings.

## 1.1 Procedure

The two-step process includes an initial Determination of Engineering and Operational Acceptability and then a final approval with the completion of NEPA. The FHWA Wisconsin Division's Field Operations Team leads the development, review, and approval of all new or revised Interstate access requests. However, final approvals are granted by the Wisconsin Division Administrator with prior approval from Headquarters in Washington, D.C. except as noted in the pages that follow.

Early coordination between WisDOT and the FHWA Wisconsin Division Office is recommended to refine the scope of the analysis and to make an initial determination if the project is reasonable. This coordination will allow for the project analysis to be performed in a cost-effective manner and provide for a more effective review of the request.

Issues to be addressed at the early coordination meetings:

- Need for FHWA review and action.

- Study area or area of influence for analysis.

<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=23>

- Defining the goal and objective of the access request.
- Preliminary alternatives to be considered.

<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=25>

- Performance objectives and measures.

<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=26>

- Technical analysis requirements for the planning, environment, design, safety, and operations issues.
- Documentation requirements. Refer to link and [Attachment 1.1](#).

<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=52>

The first step in the approval process is to obtain FHWA concurrence in a determination of engineering and operational acceptability. The "Interstate System Access Change Request" must come from WisDOT with a recommendation for approval. This request, with recommendation for approval must come from the WisDOT Bureau of Project Development. Requests submitted directly from the Regions will not be accepted. Supporting documentation in the form of an "Interstate Access Justification Report" (IAJR) must accompany the request. FHWA's decision to approve new or revised access points to the Interstate System must be supported by substantial information justifying and documenting that decision. An operational and safety analysis must demonstrate that the proposed change in access does not have a significant adverse impact on the safety and operation of the Interstate facility. If the FHWA determines the project is acceptable, project development may occur.

The second step is the final FHWA approval which constitutes a Federal Action, and as such, requires that NEPA procedures are followed. Compliance with the NEPA procedures need not precede the determination of engineering and operational acceptability. Final approval of access cannot precede the completion of NEPA. Once NEPA has been completed, approval of access is granted as long as there are no changes to the location or design of the "accepted" concept. The "Interstate System Access Change Request" submitted in the first step is submitted again with whatever changes have occurred since the first submittal as a result of design refinements or the environmental review process.

Regardless of the funding source, since approval is considered a Federal Action, the project's final approval is contingent on the successful completion of the same process as used in the planning, engineering, and environmental phases for any federally funded project. The Interstate System Access Change Request also must be adopted as part of a conforming transportation plan and STIP or TIP to receive final approval. Review of the plans, specifications, and estimate is also performed by FHWA prior to construction. This is the final opportunity to review and approve proposed changes in access. The final design is the recommended construction plan and should be consistent with the engineering concepts approved in the earlier submittals. If the final design is not consistent with the earlier approvals, a re-evaluation is necessary.

Any proposed Interstate access changes should be discussed in the early stage of development with the FHWA Field Operations Engineer and the project development engineer in the Design Project Services Section of the Bureau of Project Development (BPD). They will provide the necessary guidance for evaluating and documenting the proposal. If the request originates within the department, the Region's role is to perform the necessary analyses and prepare the justification report. If the request originates with a local unit of government, the Region should provide guidance to ensure the necessary studies and analyses are performed.

See [Attachments 1.4](#) to [1.7](#) for IAJR PEOR Process Flowcharts. [Attachment 1.4](#) shows the beginning steps of the IAJR process. These steps are common to all types of projects.

[Attachment 1.5](#) shows the remaining steps for a standard project IAJR process. A standard project is any project that is not complex or high risk complex (see definitions below).

[Attachment 1.6](#) shows the remaining steps for a complex project IAJR PEOR process. A complex project is a project where it is critical to ensure that the preferred alternative would be acceptable from an engineering and operational standpoint prior to final environmental approval (i.e. the risk is not being able to obtain IAJR approval of the preferred alternative, or the need to make adjustments after completion of the NEPA would adversely impact the development of the project). These projects usually involve any combination of the following: complex or controversial environmental issues, an accelerated project schedule, or relatively complex interchange design issues. A Preliminary Engineering & Operational Review (PEOR) is required on complex projects.

[Attachment 1.7](#) shows the remaining steps for a high risk complex project IAJR PEOR process. A high risk

complex project is a project where it is crucial to ensure that each of the proposed alternatives to be carried forward for detailed study in the environmental document would be acceptable from an engineering and operational standpoint. The risk of not being able to obtain IAJR approval of any of the proposed alternatives would adversely impact the development and delivery of the project. These projects usually involve any combination of the following: extensive or controversial environmental issues, a critical or politically sensitive projects schedule, or complex or unique interchange design issues. A PEOR is required for these projects.

Consult the "Interstate System Access Informational Guide" by the FHWA Office of Infrastructure, August 2010 and subsequent revisions, for detailed guidance on preparing an IAJR.

<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf>

Also, consult the "FHWA Prompt List for Reviewing Interstate Access Requests" in [Attachment 1.2](#). All IAJR proposals should include a conceptual signing plan.

All studies and analyses should be complete so the proposal can be properly evaluated. The request is required to be a standalone document. Referencing information that is needed to support decision making in other documents (Feasibility Study, Preliminary Engineering Report or similar document) is not acceptable. Relevant information from these documents should be provided in the appropriate section of the access request. Excerpts may be included as appendices. The document needs to be clearly written for someone who is not familiar with the project, the area, or the State.

If the Region believes the proposal is sufficiently justified and supported, submit the documentation, along with a formal request and recommendation, to the Bureau of Project Development for concurrence by the Chief of the Project Services Section. The Bureau of Project Development will circulate the IAJR for comment to the Bureau of Traffic Operations, the Bureau of Structures, the Bureau of Technical Services Acquisition and Services Section, and the Division of Transportation Investment Management Bureau of Planning and Economic Development. When any Central Office concerns have been sufficiently addressed, the Chief of the Project Services Section will submit the request to FHWA.

Coordinate new or revised access proposals within urbanized areas with the appropriate Metropolitan Planning Organization.

All new or revised access proposals will be processed through the FHWA Division Office. The responsible FHWA Field Operations Engineer should be brought into the process when the Region determines a viable proposal is being pursued.

FHWA Headquarters retains approval as found on page 8 of [Attachment 1.2](#).

Access modifications that can be approved at the FHWA Division Office include:

- New Freeway-to-crossroad interchange outside a Transportation Management Area as defined in 23 USC 134(i) ramps;
- Major modification of existing freeway-to-crossroad interchange;
- Adding new ramp(s) to an existing interchange;
- Removing ramp(s) from an existing interchange;
- Changing the interchange configuration;
- Completion of basic movements at partial interchange;
- Abandonment of ramps or interchanges;
- Locked gate access;
- Temporary access.

There is a detailed process in WisDOT's Highway Maintenance Manual Chapter 9, section 10 State Trunk Highway Connections, that outlines how non-interchange gated access is handled. Note that this chapter is currently under construction. Contact Bob Fasick at 608-266-3438 or email [Robert.Fasick@dot.wi.gov](mailto:Robert.Fasick@dot.wi.gov) for current information. Locked gates for WisDOT use do not need to be permitted, but there is an approval process that involves FHWA. A permit is required for locked gates for non-WisDOT use. For gated interchanges, the regular process, with completion of an IAJR, would be required.

For temporary access, FHWA formal documented approval is needed, even for temporary access in, or to, construction zones. Exceptions can be made when there is a very short-term emergency/incident response need.

## 1.2 Content

Interstate System Access Change Requests need to discuss the appropriate issues and provide the information necessary to allow FHWA to make an informed decision considering the potential consequences of a change in

access. The type of analysis necessary will vary on a request-by-request basis. At a minimum, the system analysis will include upstream and downstream interchanges, as well as the local road system feeding into the affected interchanges.

The FHWA policy specifies eight (8) criteria for the evaluation of new or revised access to the Interstate. Proposals must comply with all that are pertinent (refer to [Attachment 1.2](#) for additional discussion on the criteria and [Attachment 1.3](#) for a simplified typical interstate access change request and approval process flowchart). Refer to [Attachment 1.4](#) (Interstate Access Justification Report Process), [Attachment 1.5](#) (Standard Interstate Access Justification Report Process), [Attachment 1.6](#) (IAJR PEOR Process for Complex Projects), and [Attachment 1.7](#) (IAJR PEOR Process for High Risk Complex Projects) for detailed Interstate Access change request and approval process flowcharts. These criteria, which must be documented in the IAJR, are:

1. *The need being addressed by the request cannot be adequately satisfied by existing interchanges to the Interstate, and/or local roads and streets in the corridor can neither provide the desired access, nor can they be reasonably improved (such as access control along surface streets, improving traffic control, modifying ramp terminals and intersections, adding turn bays or lengthening storage) to satisfactorily accommodate the design-year traffic demands (23 CFR 625.2(a)).*

The intent of this requirement is to demonstrate that an access point is needed for regional traffic needs and not to solve the needs associated with local traffic. While the Interstate facility should not be allowed to become part of the local circulation system, it should be maintained as the main regional facility. Consider improvements to parallel facilities in lieu of new access wherever feasible.

2. *The need being addressed by the request cannot be adequately satisfied by reasonable transportation system management (such as ramp metering, mass transit, and HOV facilities), geometric design, and alternative improvements to the Interstate without the proposed change(s) in access (23 CFR 625.2(a)).*

Consider improvements within an existing interchange prior to new access. This point does not mean that only ramp metering, mass transit, and HOV facilities are the only TSM alternatives that should be considered. Analysis needs to be provided that addresses the design, safety, and operational considerations of these alternatives.

The proposed change in access also needs to document the consistency of any proposed change with regional, corridor, or system-wide assumptions of special use lanes, transit, or other alternatives to ensure the change in access does not preclude implementation of these TSM alternatives in the future.

3. *An operational and safety analysis has concluded that the proposed change in access does not have a significant adverse impact on the safety and operation of the Interstate facility (which includes mainline lanes, existing, new, or modified ramps, ramp intersections with crossroad) or on the local street network based on both the current and the planned future traffic projections. The analysis shall, particularly in urbanized areas, include at least the first adjacent existing or proposed interchange on either side of the proposed change in access (23 CFR 625.2(a), 655.603(d) and 771.111(f)). The crossroads and the local street network, to at least the first major intersection on either side of the proposed change in access, shall be included in this analysis to the extent necessary to fully evaluate the safety and operational impacts that the proposed change in access and other transportation improvements may have on the local street network (23 CFR 625.2(a) and 655.603(d)). Requests for a proposed change in access must include a description and assessment of the impacts and ability of the proposed changes to safely and efficiently collect, distribute and accommodate traffic on the Interstate facility, ramps, intersection of ramps with crossroad, and local street network (23 CFR 625.2(a) and 655.603(d)). Each request must also include a conceptual plan of the type and location of the signs proposed to support each design alternative (23 U.S.C. 109(d) and 23 CFR 655.603(d)).*

The operational and safety analysis performed needs to include all elements of the Interstate System, including collector-distributor roads, and provide a comparison of the no-build and build conditions anticipated to occur through the design years of the project. The analysis may be extended beyond the minimum requirements outlined above to establish the potential extent and scope of the impacts. Extending the limits of the analysis in urbanized areas where there are closely spaced interchanges may be required. The analysis should demonstrate the engineering and operational acceptability of the proposed change in access. When considering the impacts of various alternatives, give priority to the performance of the Interstate System within the context of the local planning, environmental, design, safety, and operational conditions.

4. *The proposed access connects to a public road only and will provide for all traffic movements. Less than "full interchanges" may be considered on a case-by-case basis for applications requiring special*

access for managed lanes (e.g., transit, HOVs, HOT lanes) or park and ride lots. The proposed access will be designed to meet or exceed current standards (23 CFR 625.2(a), 625.4(a)(2), and 655.603(d)).

All interchanges need to provide for each of the eight basic movements (or four basic movements in the case of a three-legged interchange), except in the most extreme circumstances. Partial interchanges usually have undesirable operational characteristics. If circumstances exist where a partial interchange is considered appropriate as an interim improvement, then commitments need to be included in the request to accommodate the ultimate design. These commitments may include purchasing the right-of-way required during the interim improvements.

Access to special use lanes, transit stations, or park and ride lots that are part of the Interstate System are special cases, and the movements requiring access should be determined on a case-by-case basis.

5. *The proposal considers and is consistent with local and regional land use and transportation plans. Prior to receiving final approval, all requests for new or revised access must be included in an adopted Metropolitan Transportation Plan, in the adopted Statewide or Metropolitan Transportation Improvement Program (STIP or TIP), and the Congestion Management Process within transportation management areas, as appropriate, and as specified in 23 CFR part 450, and the transportation conformity requirements of 40 CFR parts 51 and 93.*

The Interstate System Access Change Request needs to include a discussion as to how the proposal is consistent with the transportation planning activities for the area. If the project will be added to the planning process in the future, a discussion needs to be provided that indicates how the project will affect the current plan.

Although FHWA may review a proposed change in access prior to its inclusion in the transportation plans, final approval cannot be given until the project is adopted in the MPO's long-range transportation plan or MPO's TIP within metropolitan areas and the STIP in rural areas. This would include funding from any sponsor, including a State, local agency, or private developer. Additionally, if approval of the access hinges upon improvements to the local street network, those local improvements must also be included in the TIP and STIP.

6. *In corridors where the potential exists for future multiple interchange additions, a comprehensive corridor or network study must accompany all requests for new or revised access with recommendations that address all of the proposed and desired access changes within the context of a longer-range system or network plan (23 U.S.C. 109(d), 23 CFR 625.2(a), 655.603(d), and 771.111).*

Sufficient review and coordination needs to be performed to avoid conflicts with other proposed changes in access or corridor improvements. If two or more changes in access are being considered in the same vicinity, then these changes should be analyzed together. The combined effect of the proposed change in access is especially important when several new interchanges are proposed.

The intent of this requirement is to avoid isolated, piecemeal analysis for access change decisions. Where multiple access changes are anticipated in the vicinity, analysis must consider the possible, cumulative effects if all were to be implemented.

7. *When a new or revised access point is due to a new, expanded, or substantial change in current or planned future development or land use, requests must demonstrate appropriate coordination has occurred between the development and any proposed transportation system improvements (23 CFR 625.2(a) and 655.603(d)). The request must describe the commitments agreed upon to assure adequate collection and dispersion of the traffic resulting from the development with the adjoining local street network and Interstate access point (23 CFR 625.2(a) and 655.603(d)).*

Highways should be developed in an orderly and coordinated manner to serve the public. When new development is the driving force behind the need for access, it is expected that the appropriate coordination and analysis is performed to achieve mutual benefits with minimal adverse impact on Interstate travelers. As a condition of approval, certain parts of the local circulation system may require construction or improvement before the new or change in access is opened to traffic. Coordination and cooperation is essential to ensure that when several projects are linked to the approval of a change in access that they are constructed according to an appropriate phasing plan. A commitment of funding or inclusion of projects as part of the planning process prior to final approval of the change in access may be required.

8. *The proposal can be expected to be included as an alternative in the required environmental evaluation, review and processing. The proposal should include supporting information and current status of the environmental processing (23 CFR 771.111).*

The Policy allows for a two-step approval process. The first step is the determination of engineering and operational acceptability. The final approval can be granted only after the National Environmental Policy Act (NEPA) process is completed. The NEPA process must be followed regardless of the source of funding (including private funding) for the project, since approval of the proposed change in access constitutes a Federal Action. The development of final plans, specifications and engineering, and right-of-way acquisition and construction may be performed only after this final approval is granted.

Provision of a change in access, particularly new access, should be considered in the context of statewide and local transportation and land use planning. The Interstate System typically serves as the backbone of the transportation network, and access to this facility can have significant impact on local and regional traffic circulation. The existing transportation planning activities provide a venue for coordination of stakeholders with divergent interests and concerns. Understanding the stakeholder interests and concern is an important aspect of developing an informed decision about the merits of a change in access.

Chapter 4 of the Interstate System Access Informational Guide discusses the various transportation planning activities that may be significant in considering proposed changes in Interstate access. The various factors and considerations of the relationship between the transportation planning process and the policy are discussed. The documentation requirements for ensuring the information needed to support informed decision making is also discussed in chapter four.

<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=33>

The FHWA approval of Interstate System Access Requests constitutes a Federal Action, and as such, requires that the National Environmental Policy Act (NEPA) is followed. NEPA codified the national commitment to the environment quality, established a national environmental policy, and provided a framework for environmental planning and decision-making by Federal agencies. NEPA directs Federal agencies, when developing projects or issuing permits, to conduct environmental reviews to consider the potential impacts on the environment by their proposed actions. NEPA also established the Council on Environmental Quality (CEQ), which is charged with the administration of NEPA. The NEPA process consists of a set of fundamental objectives that include interagency coordination and cooperation and public participation in planning and project development decision making.

With the two-step process for approval of Interstate System Access Change Requests, compliance with the NEPA procedures need not precede the determination of engineering and operational acceptability. However, final approval of access cannot precede the completion of NEPA, even if no Federal funds are used. Once NEPA has been completed, approval of access is granted as long as there are no changes to the location or design of the accepted concept. Typically, NEPA requirements are met through the normal project development process of each State. See Chapter 5 of the Interstate System Access Information Guide for more detailed information on the environmental considerations of changes to interstate access.

<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=43>

Geometric design relates to the visible dimensions of a highway and includes horizontal and vertical alignments, cross-sectional elements (lanes, shoulders, roadside, etc.), lateral and vertical clearances, sight lines, and so forth for the mainline, ramps, and crossroad. These features of a design define the form of a facility and are directly influenced by variables such as modal types, volumes, speeds, desired operational quality of service, safety performance, available right-of-way, environmental impacts, and cost constraints. Consequently, geometric design is specifically addressed in an Interstate System Access Change Request. While detailed geometric design will be reviewed prior to approval of the plans, specifications, and estimate; information conveyed in the request should be of sufficient detail to allow full evaluation of the eight policy requirements and to determine overall adequacy in terms of design standards and criteria and any anticipated design exceptions. It should be noted that compliance with standards and criteria does not guarantee engineering and operational acceptability of an access request. Other aspects of designs, such as structures, pavement, geotechnical, etc., need to be addressed in a request, but only to the conceptual level necessary to define potential impacts.

The proposal of a change in access that complies with design standards does not guarantee engineering, safety, and operational acceptability, nor does the use of design exceptions indicate that a proposed design will not function well. In general, design exceptions should be avoided, however designers are often required to make trade-offs in balancing competing project needs and limited resources. Appropriate evaluation of design standards, design exceptions, and safety and operational characteristics of the facility will all be considered in the determination of engineering and operational acceptability. See Chapter 6 of the Interstate System Access Information Guide for more detailed information on the design considerations of changes to interstate access.

<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=47>

It is in the national interest to maintain as high a degree of mobility and safety performance on the Interstate

System as possible, while at the same time balancing the need to provide connectivity to the local road network. Therefore, quantifying the impacts of a change of access to each of these key factors is an important aspect of protecting the integrity of the Interstate System. For safety performance, this involves the need to examine both qualitatively and quantitatively, the effects of the proposed change in access. See Chapter 7 of the Interstate System Access Information Guide for more detailed information on the safety considerations of changes to Interstate access.

<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=55>

The operational analysis of new or modified access is integral to understanding the benefits and potential impacts to the Interstate System and local roadway network. In accordance with FHWA's Policy, a detailed traffic operational analysis must accompany all requests for change in interstate access. Chapter 8 of the Interstate System Access Information Guide discusses an approach to address the operational aspects of the policy, including defining an analysis study area, establishing operational performance measures, and selecting and interpreting the results of traffic analysis tools. The chapter draws heavily upon the guidance of the FHWA Traffic Analysis Toolbox.

<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=65>

Chapter 9 of the Interstate System Access Information Guide provides additional technical resources that contain guidance on the technical analysis of changes in interstate access.

<http://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf#page=83>

### **LIST OF ATTACHMENTS**

<a href="#">Attachment 1.1</a>	Information Required for New or Revised Interstate Access
<a href="#">Attachment 1.2</a>	FHWA Prompt List for Reviewing Interstate Access Requests
<a href="#">Attachment 1.3</a>	Simplified Flowchart for Typical Interstate System Access Change Request and Approval Process
<a href="#">Attachment 1.4</a>	Interstate Access Justification Report (IAJR) Process - Common Beginning Steps
<a href="#">Attachment 1.5</a>	Standard Project IAJR Process
<a href="#">Attachment 1.6</a>	Complex Project IAJR PEOR Process
<a href="#">Attachment 1.7</a>	High Risk Complex Project IAJR PEOR Process