

Alaska Tribal Transportation Workgroup

Board of Directors

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P.O. Box 792
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Bureau of Indian Affairs
Department of Transportation

Federal Highway Administration
Federal Lands Highway - IRR

IRR Program Coordinating Committee

Ref: Recommendation for Changes in the IRR High Priority Project

To: BIA, FHWA, and IRRPCC Representatives

The Board of Directors of the Alaska Tribal Transportation Work Group (ATTWG), a non-profit corporation organized for the purpose of providing technical support and advocacy for transportation issues that impact Alaska Native Villages, met to discuss needed changes to the IRR Program's IRRHPP \$1 million cap.

The IRR Program Regulations went into effect in November of 2004. We know there has been significant inflationary impact to the cost of implementing IRR Construction projects. The cost increase for fuel in Alaska alone has caused a significant rise in the cost of construction. We urge raising the IRRHPP cap for funding to at least \$3,000,000 per project so that construction of critical projects may continue across the country.

The IRR Regulations were written with the expectation that the IRRHPP cap would need to be adjusted. Below is the specific Regulation where this is noted (underlined).

§ 170.157 What is the IRR Program Coordinating Committee's role in the funding process?

The Committee's role is to provide input and recommendations to BIA and FHWA regarding:

- (a) New IRR Inventory Data Format and Form;
- (b) Simplified Cost to Construct (CTC) Methodology (including formula calculations, formula program and design, and bid tab methodology);
- (c) Cost Elements;
- (d) Over-Design Issues;
- (e) Inflation Impacts on \$1 Million Cap for IRRHPP and Emergency Projects (including the IRRHPP Ranking System and emergency/disaster expenditures report); and
- (f) The impact of including funded but non-constructed projects in the CTC calculation.

We urge you to take swift action to increase the IRRHPP funding cap. Please do not hesitate to contact us for additional information at chair@attwg.org . Thank you for the opportunity to provide our comment.

Sincerely,

A handwritten signature in blue ink that reads "Julianne E. Baltar". The signature is written in a cursive style.

Julianne E. Baltar, Chairperson