IRR Inventory Issues
Thursday September 11, 2008

1. Clearly define “purpose and intent” of strip maps and location maps based on the current language as described in the regulations.

If additions, changes or modifications to the “purpose and intent” of the strip & location maps are desired by the reviewing agency, then an update to the language should be made and a formal process of sending the updates out to all regions and Tribes should be performed. Any updates to the strip map format and or content should be communicated to the tribes on an annual basis and should go into effect by April 15th of each calendar year. This would give the tribes enough time to make any adjustment to their strip map procedures and begin the inventory submission process in a timely manner. If strip map updates are not officially received by the tribes by the April 15th date, then the previous years language will apply.

This past year, certain changes were made to the coding guide. The process by which the Navajo DOT learned and was informed of the changes was not done in professional and prudent manner – but rather quite nonchalantly. Furthermore the Navajo DOT was made aware of the new “draft” coding guide towards the end of the submission season, this resulting in a reworking of some of the inventory data that was already prepared.

In any and all cases where updates are made to the coding guide, strip maps or any other relevant items that impact the IRR inventory deliverables, the BIADOT should exercise due diligence in communicating these important changes in an officious, consistent and timely manner.

2. Clearly define criteria for “eligible public roads”. A criterion that defines RIFDS eligible public routes should utilize generally accepted transportation engineering based methods as a foundation basis for objectively defining public routes – based on objective engineering principals. This methodology however should be careful to not include the acquisition of ROW as a criterion for determining public eligibility. The labor intensive and time consuming process of navigating through the political and bureaucratic red tape typically associated with acquire ROW access – particularly within Indian Lands - would be counter productive and would cause significant delays in getting the National IRR inventory to approach 100% mark.

It should be noted that the Navajo DOT will be establishing a set of public route criteria as part of our existing contract for use in this years submission. I would suggest that after the Navajo DOT has completed the methodology that it be shared with the PCC and considered as a standard for use be other regions and tribes.

More to follow....

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On Behalf of the Navajo Nation DOT