



## Multimodal Project Discretionary Grant Application

# CROSSROADS-OF-AMERICA:

## Replacing Bridges on I-35/I-240 in Oklahoma City

### Project Readiness

Grant Request:  
**\$61,250,000**

Total Project Cost:  
**\$122,500,000**

Daniel Nguyen, P.E., MBA  
Director of Project Delivery  
[dnguyen@odot.org](mailto:dnguyen@odot.org)



**OKLAHOMA**  
Transportation

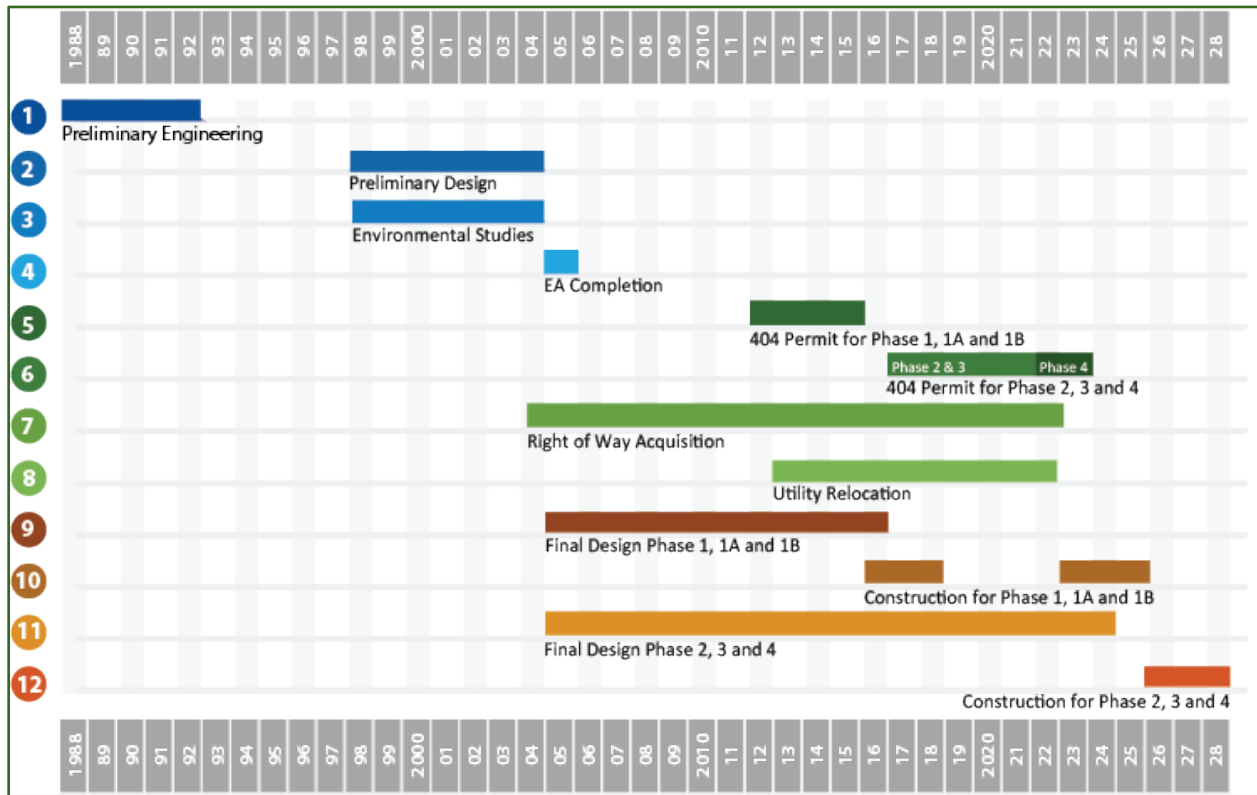
# 1. Project Readiness

## 1.1 Environmental Risk

### DETAILED PROJECT SCHEDULE

Oklahoma Department of Transportation (ODOT) is on track to obligate funds well in advance of the U.S. Department of Transportation (USDOT) deadline of September 30, 2028, for FY25/FY26 Multimodal Project Discretionary Grant (MPDG) funds. ODOT will begin construction quickly after obligation of grant funds, with construction completion well in advance of the FY25/FY26 MPDG expenditure deadline of September 30, 2033. Figure 1 shows the Project schedule and outlines major milestones.

**Figure 1. Project Schedule**



Project letting will be in September 2025. Project construction will begin in January 2026 and will be complete in spring 2028. ODOT is committed to improving safety and operational performance by establishing a project schedule that maximizes efficiency to give disadvantaged communities in Oklahoma City immediate relief from the congestion and mobility issues they are currently experiencing, as well as reducing supply-chain bottlenecks to support the local and national economy.

### REQUIRED APPROVALS

#### Environmental Permits and Reviews

All environmental work for the Project has been completed, with an environmental assessment (EA) completed in September 2005 and reevaluations completed in 2013 and 2015. The EA was developed to show not only the environmental impacts of reconstructing the interchange but also the social and economic impacts. The document complies with the National Environmental Policy Act of 1969 (NEPA).

A noise study was also conducted as part of the EA. The main purpose of the noise study was to determine the noise impacts from the proposed interchange improvements and the possible mitigations to these impacts. Environmental impacts considered in this assessment were as follows: water quality, wetland impacts, threatened or endangered species, and others. The most recent reevaluation was completed December 1, 2015. U.S. Environmental Protection Agency (EPA) Clean Water Act (CWA) 404 Permits have been acquired for Phases 2 and 3 of the Project as of September 15, 2023, and are expected to be obtained for Phase 4 of the Project in June 2024. No delays are anticipated.

### Permitting

Permitting will be completed by June 2024, when the EPA CWA 404 Permits for the final phase (Phase 4) of the Project are expected to be obtained. Permits for previous Project phases have been obtained already, and no delays are expected.

### Right-of-Way Acquisition

The right-of-way (ROW) has been acquired for the Project, with most ROW acquisition taking place between 2004 and 2006 and final ROW acquisition completed in 2017. No additional ROW is required for the Project.

### Public Engagement

ODOT is committed to employing meaningful community engagement strategies that involve and incorporate diverse input for Project planning and decision making. ODOT also understands that, because of this Project's magnitude, successful community engagement will require an understanding of the surrounding community demographics, strong relationships with affected communities, an understanding of the communities' wants and needs, broad community representation, tailored engagement techniques for each community, and accessible documentation of the communities' impacts on decisions.

ODOT has completed a variety of public outreach efforts for this Project dating back to the early 2000s. More recent outreach has included the following:

- Public meeting where 70 people attended; asked questions; and provided comment on traffic congestion, safety, Project schedule, funding, noise, and health concerns from construction activities
  - Public meeting announcement included date, time, and location, as well as background information providing Project detail and context for attendees.
- Written comment from community members
- Agency comment from Oklahoma Conservation Commission, Oklahoma Water Resources Board, and the Oklahoma Tourism and Recreation Department
- South Oklahoma City Chamber of Commerce and local business written comment and feedback

Outreach is ongoing, and because the Project area is within both an Area of Persistent Poverty and a Historically Disadvantaged Community (refer to Project Description, attached), ODOT will be especially attentive to the needs of these communities and has a robust plan for continuing to engage the surrounding communities and responding with appropriate mitigation solutions.

In addition to following public involvement requirements within Title 23 of the *Code of Federal Regulations*, ODOT's engagement and outreach efforts align with USDOT's six key features of public involvement outlined in the USDOT *Promising Practices for Meaningful Public Involvement in Transportation Decision-Making Guide*.

### State and Local Approvals

The Project is included on page 18 of the FFY-2024 through FFY-2031 Construction Work Plan as I-35 @ the I-240 Junction Phase 2: 09032(06), Phase 3: 09032(07), and Phase 4 09032(08) Reconstruct Interchange. No additional state or local approvals are anticipated for the Project.

The project is also included in the Oklahoma Statewide Transportation Improvement Program (STIP) and the [Association of Central Oklahoma Governments \(ACOG\) Transportation Improvement Program \(TIP\) \(09032\(06\)\)](#).

### Federal Transportation Requirements Affecting State and Local Planning

The Project is included in relevant state and local transportation plans, including the ODOT FFY-2024 through FFY-2031 Construction Work Plan, as described in the State and Local Approvals section. In addition, the Project is listed in the FFY 2022–2025 Statewide Transportation Improvement Program (JP [#0903206](#), JP [#0903207](#), and JP [#0903208](#)). ODOT completed an [Access Justification Report](#) for the Project in 2015.

The Project is also included on page 6-14 of the Oklahoma Freight Transportation Plan, 2023–2030, which identifies I-35 as the roadway with the highest volume of truck traffic in Oklahoma.

### ASSESSMENT OF PROJECT RISKS AND MITIGATION STRATEGIES

Potential risks and mitigation strategies to minimize the potential impact of those risks are summarized in Table 1. ODOT will continue to evaluate the potential Project risks and adjust the mitigation strategies as coordination and design advance.

**Table 1. Project Risk and Mitigation Strategies**

<b>Project Risk (Probability of Occurrence)</b>	<b>Mitigation Strategies</b>
Cost Increases (Moderate Risk)	<ul style="list-style-type: none"> <li>▪ Construction prices, including costs of materials and labor, have been trending upward in recent years with inflation. Cost estimates include the most recent escalation factors to accommodate the foreseeable increases.</li> <li>▪ ODOT’s construction estimates contain a 20% contingency allowing for a margin of increase.</li> <li>▪ ROW has been acquired already, limiting the impacts of inflation and risk of cost overruns for this Project.</li> <li>▪ ODOT has included the Project in its 8-year Construction Work Plan and remains committed to adjusting as needed to meet all MPDG and statutory deadlines for funding obligation and expenditure.</li> </ul>
Procurement (Low Risk)	<ul style="list-style-type: none"> <li>▪ The risk of procurement delays will be reduced by bundling the remaining phases into a single Project, allowing ODOT to streamline the procurement process and potentially issue a single construction contract.</li> </ul>
Public Consensus (Low Risk)	<ul style="list-style-type: none"> <li>▪ ODOT will continue its close coordination with the community as design advances.</li> <li>▪ ODOT will acknowledge the public’s support of the purpose and need for the Project to improve safety and provide additional connectivity and mobility, which will benefit the local community.</li> </ul>

Project Risk (Probability of Occurrence)	Mitigation Strategies
	<ul style="list-style-type: none"> <li>▪ ODOT will address stakeholder and community concerns and incorporate public comments as the Project continues.</li> </ul>
Utility Relocation and Right-of-Way—Acquisition (Low Risk)	<ul style="list-style-type: none"> <li>▪ ODOT has acquired all ROW necessary for Project completion. The ROW has been acquired for the Project, with most of the ROW acquisition taking place between 2004 and 2006 and final ROW acquisition completed in 2017. No additional ROW is required for the Project.</li> <li>▪ Utility coordination has also been completed for the Project as of February 2023, including coordination with all affected utilities.</li> <li>▪ ODOT will continue to collaborate with the community to develop creative, community-driven solutions to meet the needs of roadway users.</li> </ul>
Environmental Risk (Low)	<ul style="list-style-type: none"> <li>▪ NEPA has been completed for the Project; an EA was conducted in 2003, and a reevaluation was completed in December 2015.</li> </ul>

## 1.2 Technical Capacity

As the Project sponsor, ODOT has the technical capacity to successfully deliver the Project, along with decades of experience with receipt and expenditure of federal transportation funds. ODOT has a successful track record collaborating with various entities, including local governments and tribal nations, to execute projects to construct, improve, and maintain Oklahoma’s transportation infrastructure. ODOT aims to create a secure, cost-efficient, and reliable transportation system that serves the needs of Oklahoma’s residents, businesses, and communities. ODOT is committed to improving transportation throughout Oklahoma in various areas, including roadway and bridge maintenance and preservation, construction management, and planning.

ODOT has received hundreds of millions of dollars in federal discretionary funding and has experience managing large and complex projects funded in part by USDOT, including projects funded through INFRA, Better Utilizing Investments to Leverage Development, Competitive Highway Bridge Program, Rebuilding American Infrastructure with Sustainability and Equity, and Transportation Investment Generating Economic Recovery grants.

ODOT is committed to improving traffic conditions and safety on Oklahoma bridges and roads. ODOT obligates all required construction funding before advertising a project for construction and again before awarding a contract for construction. In addition, ODOT has consistently seen a contract growth of less than 3%, which is covered by other formula federal funds or Oklahoma State Rebuilding Oklahoma Access and Driver Safety funds. Additionally, this Project will align with ODOT’s progress to date of addressing safety and capacity improvements.

In 2024, ODOT will be rolling out the most recently updated 8-year Construction Work Plan, which goes beyond the federally required 4-year plan. The plan contains 1,738 projects with a total value of nearly \$8.8 billion. ODOT has a commitment to improving its bridge conditions. From 2004 to 2021, Oklahoma improved from 49th to 5th in the nation for highway bridge condition. This 8-year plan marks the continuation of ODOT’s commitment to improving bridges at risk of becoming structurally deficient. The plan addresses 290 bridges currently at risk of becoming structurally deficient.

Furthermore, ODOT manages a large portfolio of federal funds programmed within the [FFY2024 through FFY-2031 Construction Work Plan](#). This \$8.8 billion program, the largest construction workplan in state history, annually reprioritizes projects based on available state and federal appropriations and is currently 60% federally funded. ODOT has the technical expertise and resources dedicated to the Project to provide quality control throughout implementation, keep the public informed of the Project's progress, and confirm the Project meets all federal requirements.