

# I-40 CLINTON

## Mobility and Freight Improvement Project

### Project Narrative



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## I. BASIC PROJECT INFORMATION

### Project Description

The Oklahoma Department of Transportation (ODOT) is requesting a \$27.1 million Bridge Investment Program (BIP) Grant to construct the Interstate 40 (I-40) Clinton Mobility and Freight Improvement Project that will replace four structures at two locations (Red Wheat Drive and Neptune Drive Bridges). The Project, located in rural Oklahoma, will replace three structures that are at-risk of becoming structurally deficient due to current substructure conditions and one structure that is at-risk of becoming structurally deficient due to current deck, superstructure, and substructure condition. Additionally, all four structures are rated as functionally obsolete.

**Figure 1** presents the Red Wheat Drive Bridges (National Bridge Inventory (NBI) #14478 and #14477) that carry I-40 Eastbound and Westbound, respectively, over the Farmrail Corporation Railroad right-of-way (FMRC RR) and Red Wheat Drive. These structures were originally constructed in 1959 and rehabilitated in 1985.



**Figure 1: Red Wheat Drive Bridges**

**Figure 2** shows the Neptune Drive Bridges (NBI #17581 and #17582) that carry I-40 Eastbound and Westbound, respectively, over the Grainbelt Corporation Railroad right-of-way (GNBC RR) and Neptune Drive. These structures were originally constructed in 1969 and have not been rehabilitated.

### Critical Element of Larger Interchange Project

The \$39.8 million replacement of the Red Wheat Drive and Neptune Drive Bridges are critical components of a larger ODOT project that will enhance the I-40 infrastructure in Clinton, Oklahoma (population 8,521). At a total cost of \$59.0 million, the I-40 at Exit 65 Interchange Project (I-40 at Exit 65 Project) will modify the existing interchanges on I-40 at Gary Boulevard (Exit 65) and Neptune Drive (Exit 65A). The existing interchanges directly serve southwestern Clinton with connections to Clinton High School, Southwest Elementary School, Acme Brick Park, McLain Rogers Park, residential neighborhoods, and commercial/retail properties.



**Figure 2: Neptune Drive Bridges**

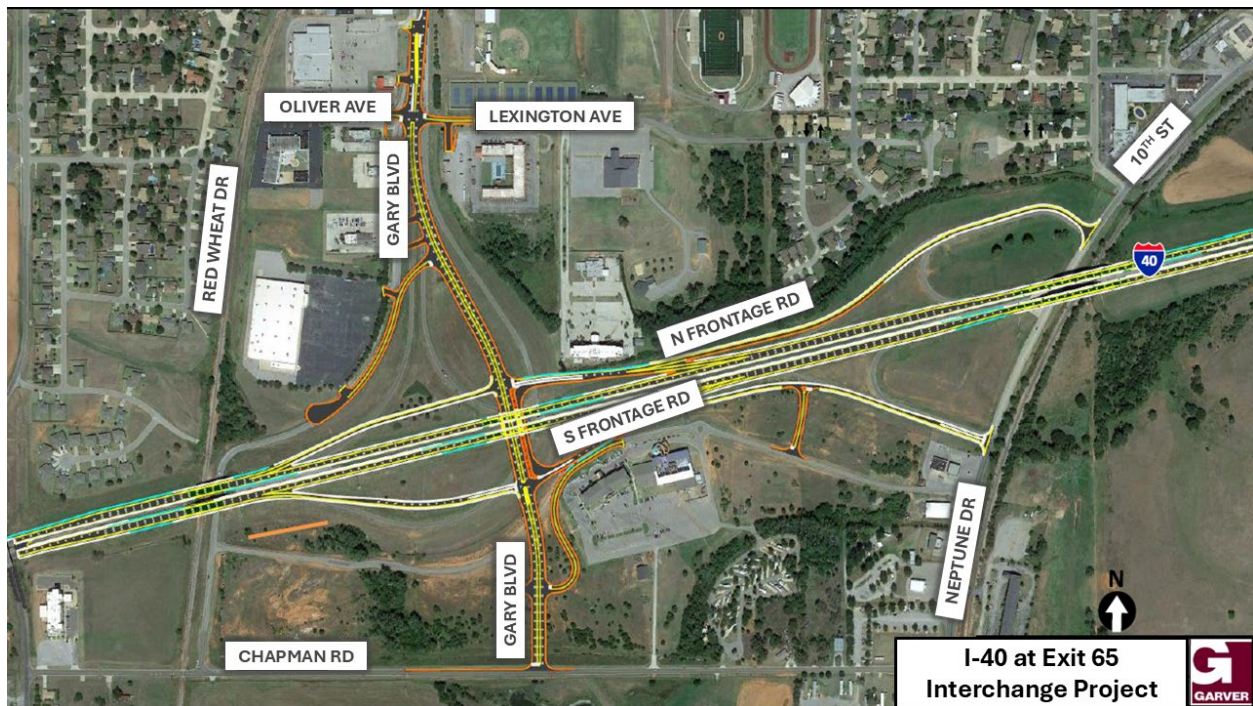
The current interchange configuration provides full access at Neptune Drive but lacks direct access from southbound Gary Boulevard to eastbound I-40.

The spacing of the interchanges results in approximately 1,000' weaving distance in the westbound direction. In addition to the ramp access and spacing issues, a six-legged intersection at the intersection of Gary Boulevard/I-40 Ramps at Red Wheat Drive/Oliver Avenue/Lexington

Avenue forces drivers to make complex decisions/judgments from multiple legs, including nearby driveway access. The unconventional geometrics create congestion, safety, and connectivity issues throughout the study area.

The I-40 at Exit 65 Project will consolidate ramp access at the interchanges, eliminate weaving, improve roadway geometry to meet modern design standards, provide connectivity via a one-way frontage roads/U-turn system, connect Gary Boulevard to Chapman Road and I-40 eastbound, and simplify the complex and congested 6-legged intersection referenced above. Freeway operation and ramp access will maintain conditions at a level of service (LOS) B or better through the 2050 design year. The revised freeway and interchange configuration is expected to reduce crashes by 17% according to HSM predictive safety results using the ISATe tool. This total does not capture the expected safety benefit from the conversion of the six-leg intersection to the more conventional 4-leg intersection.

Figure 3: Larger I-40 at Exit 65 Project



### Specific Improvements

Consistent with the BIP Program's goals, the objectives of the Project are to improve the safety, efficiency, and reliability of the movement of people and freight over bridges and to reduce the number of bridges that do not meet current geometric design standards of the regional transportation network. This will be accomplished by implementing the Project's scope of work which will address state of good repair and safety challenges by replacing the existing structures with new structures that have been engineered to meet current geometric design standards.

As noted earlier, the Red Wheat Drive Bridges were built 65 years ago and rehabilitated 40 years ago, while the Neptune Drive Bridges were built 55 years ago and have not gone through a major rehabilitation.

In terms of state of good repair challenges, all four structures have exceeded their anticipated useful life and as shown in the Inspection Reports ([Attachment A](#)), are experiencing structural deficiencies. Similarly, existing safety challenges, as reflected below, demonstrate that the original geometry for all four structures does not provide adequate shoulder width, sufficient lighting, or standard safety barrier designs. To address these transportation challenges, the Project's scope of work reflects the following:

- ▶ **Red Wheat Drive Bridges:** The two existing structures will be removed and replaced with two conventional three-span prestressed beam bridges. The existing cross section of three 12-foot travel lanes, and 5-foot inside and outside shoulders will be replaced with three 12-foot-wide travel lanes with a 4-foot inside shoulder and a 12-foot outside shoulder. Vertically, the I-40 profile will be raised to meet the current geometric highway standards for a design speed of 70 mph.

The existing vertical clearance over the railroad along Red Wheat Drive is inadequate by 9-feet. The new bridges have been designed to accommodate the 23'-6" clearance over the railroad right-of-way per the Union Pacific Railroad-BNSF Railway Guidelines for Railroad Grade Separation Projects as well as the 16'-9" vertical clearance over roadways per current ODOT Bridge Directives.

The proposed Red Wheat Drive Bridges over the FMRC will be 227-feet long (approximately the same length as the existing bridges) and composed of three prestressed concrete beam spans. This approach reflects ODOT's desire to use 3:1 slopes on new bridges which can be accomplished with the removal of Red Wheat Drive. Additionally, by maintaining a 30-foot horizontal clearance, the railroad can be crossed using a Type III prestressed concrete beam span while maintaining the required vertical clearance. Proposed bridge piers will be located within the FMRC right-of-way.

- ▶ **Neptune Drive Bridges:** The two existing structures will be removed and replaced with two conventional three-span prestressed beam bridges. The existing cross section of two 12-foot travel lanes and a 4-foot shoulder on the inside and outside lane will be replaced with two 12-foot travel lanes as well as a 4-foot-wide inside shoulder and a 12-foot-wide outside shoulder.

The two bridges over Neptune Drive & the GNBC will consist of a 40-foot clear roadway with a 12-foot outside shoulder, two 12-foot travel lanes, and a 4-foot insider shoulder. Both bridges will be 470-feet long and composed of four steel plate girder spans to minimize structural depth and maintain sufficient vertical clearance.

In addition to the increase in shoulder width on all four structures, additional safety investments include the introduction of LED lighting and enhancements to the safety barriers to meet current design standards. Finally, all structures have been engineered to a 75-year design life.

## Project History

In May 2015, ODOT initiated Preliminary Engineering (PE) for the I-40 and Exit 65/65A Interchange, including the four structures in this application. The initial PE effort reviewed the existing functionality of the interchange as well as traffic at nearby intersections with a goal of improving safety, mobility, and access along the corridor and within Clinton. Six alternatives to improve the interchange were developed and presented at a public meeting held in May 2016 within Clinton. In response to feedback received at this meeting, two additional alternatives were developed and added to the PE effort. The two new alternatives were presented to the public in

February 2019. Based on this feedback, the two new alternatives were further refined and documented in the June 2020 I-40 Exit 65 Interchange at Gary Boulevard Preliminary Engineering (Addendum #2) Report ([Attachment B](#)). Finally, the two new alternatives were presented via a virtual public open house that was held between December 2 and December 21, 2020. Utilizing the PE study area, the National Environmental Policy Act (NEPA) process started in August 2021 and a Documented Categorical Exclusion for the preferred alternative was executed with the Federal Highway Administration (FHWA) in November 2022 ([Attachment C](#)). Final design activities started in August 2021 and are scheduled to be completed in February 2025.

To date, ODOT has spent \$3.7 million on design activities, \$6.9 million for utilities and right-of-way \$0.11 million to complete NEPA requirements for the larger I-40 at Exit 65 project. The estimated share of these costs allocated to the Red Wheat Drive and Neptune Drive Bridges is \$2.0 million for design, \$64,000 for NEPA activities, and \$3.8 million for utilities.

Finally, as a component of the larger I-40 at Exit 65 Project, replacement of the Red Wheat Drive and Neptune Drives Bridges was incorporated into the [ODOT 2024-2027 Statewide Transportation Improvement Program](#) in April 2024 and into the [ODOT 8-Year Construction Workplan \(CWP\)](#) starting in 2017 and more specifically into the 2025-2032 CWP in October 2024.

### Regional Context

Combined, the Red Wheat Drive and Neptune Drive Bridges and the larger I-40 at Exit 65 Project are the largest construction projects for ODOT District 5 in the current CWP.

The CWP includes 183 projects within District 5 which range in costs from \$100,000 to \$61.5 million. **Table 1** provides a small sample of other ODOT District 5 construction projects programmed in the CWP. Without a BIP grant award, the Project will use a significant portion of the District 5 budget, which could result in other, also critical, projects being pushed out of the 8-year programming period due to lack of funds.

**Table 1: Sample of Other Programmed District 5 Investments in CWP**

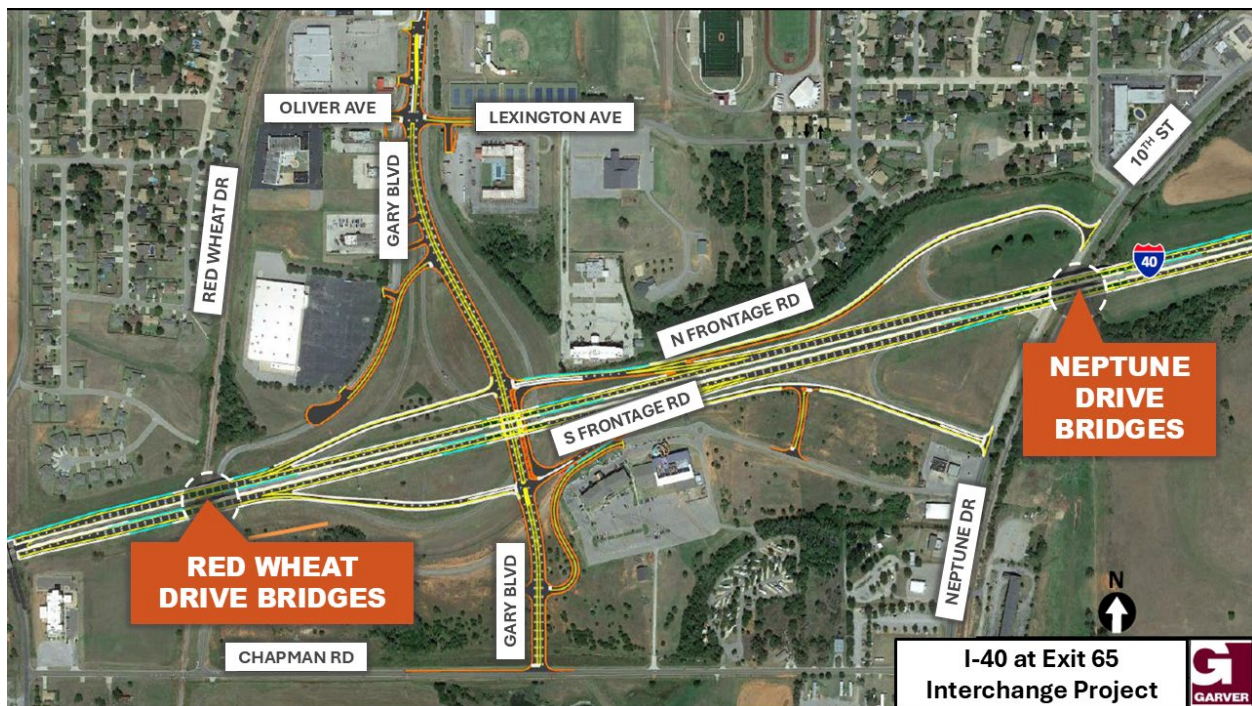
Project	County	Cost
▶ I-40 grading, drainage, bridge, and surfacing – I-40 Exits 40 and 41 east and westbound lane	Beckham	\$61.5 M
▶ I-40 resurfacing – MP 86.27 to MP 89.72	Caddo	\$11.3 M
▶ SH-54 widening and resurfacing – 6 miles north of SH-152 junction	Washita	\$12.5 M
▶ SH-33 widening, resurfacing and bridge – 7.2 mile east side of Thomas to the Dewey County Line	Custer	\$11.5 M
▶ US-183 widening and resurfacing – 7.8 miles south of SH-270	Dewey	\$13.0 M
▶ SH-152 widening, resurfacing and bridge – 6.0 miles east of SH-6	Beckham	\$12.5 M
▶ US-270 grading, drainage, and surfacing – 3.9 miles southeast of SH-58 junction	Blaine	\$28.1 M
▶ I-40 resurfacing – MP 95.76 to MP 102.20	Caddo	\$13.9 M
▶ US-283 widening and resurfacing – 5.8 miles north of SH-9 South junction	Greer	\$12.4 M
▶ SH-6 widening, resurfacing and bridge– 5.4 miles east of SH-152 junction	Beckham	\$14.9 M
▶ I-40 resurfacing – MP 25.1 to MP 32.66	Beckham	\$16.0 M

## Project Location

As shown in **Figure 4**, the Project is located in Custer County near the interchange of I-40 and Gary Boulevard/I-40 Business, in Clinton, Oklahoma. The four structures carry east-bound and west-bound I-40 over local roads and the right-of-way of two Class III common-carrier railroads.

The Project is located in Census Tract 40039950800 which is identified as an urbanized area and a historically disadvantaged area, as ranked by the USDOT Equitable Transportation Community (ETC) Explorer and the Climate and Economic Justice Screening Tool (CEJST). The Project location, however, is not considered an Area of Persistent Poverty for the purpose of BIP program funding.

**Figure 4: BIP Grant Application Project Location Map**



## Lead Applicant and Other/Private Parties

The Project is led by ODOT. As a state transportation agency, ODOT plans, constructs, and maintains the highway system in Oklahoma and manages a large portfolio of Federally funded projects that are programmed within its CWP. Annually, ODOT receives and expends Federal-aid highway program funds under 23 U.S.C. Additionally, since the start of the Bipartisan Infrastructure Law (BIL), ODOT has been awarded several discretionary grants including an \$85.0 million Mega grant to help fund projects related to the I-44 and US-75 interchange and a \$123.8 million Large BIP grant award for the Roosevelt Memorial Bridge Investment Project. ODOT's grant management team has extensive experience in addressing grant obligation, monitoring, compliance, and grant close out requirements. ODOT's Contract Compliance Division oversees the Department's Disadvantaged Business Enterprise (DBE) program and ensures that ODOT and all its consultants and contractors comply with applicable Civil Rights requirements. No other parties will be involved in delivering the Red Wheat Drive and Neptune Drive Bridges.



Finally, no private or non-private entity will receive a direct and predictable financial benefit if the Project is selected for an award.

### Additional Eligibility Requirements

**Maintenance:** ODOT will use dedicated maintenance funds to maintain the four new structures. These funds are committed and will be available for this Project in the future. As documented in ODOT's [2022- 2031 Transportation Asset Management Plan](#) (TAMP), maintenance and preservation funds come from State and federal sources. ODOT forecasts future funding based on historical data and allocates this revenue to its eight districts. Maintenance funds are allocated annually based on a lifecycle analysis of existing assets to determine the most cost-effective uses of these funds for maintenance, preservation, rehabilitation, and reconstruction. ODOT currently has \$43.7 million in the TAMP for bridge maintenance and preservation.

***While ODOT's TAMP does not list specific projects, the Red Wheat Drive and Neptune Drive Bridges are consistent with goals of the TAMP; replacing the bridges will result in a lower lifecycle cost (over 30 years) than continuing the on-going maintenance and preservation activities.***

**Accommodation for Bicyclists and Pedestrians:** Bicyclists and pedestrians are not currently allowed to operate on I-40 throughout Oklahoma and as a result, sidewalks will not be included on the Neptune Drive or Red Wheat Drive Bridges. However, there are future plans to construct two 8'-8" sidewalks on each side of the realigned Gary Boulevard which is part of the greater I-40 at Exit 65 Project. This sidewalk will provide a new north-south connection under I-40 for the community. While the Project will not directly provide accommodation for bicyclists or pedestrians, it will support those improvements on future elements of the larger I-40 at Exit 65 Project.

## II. NATIONAL BRIDGE INVENTORY DATA

NBI data is provided in the Project Application Form. All NBI data is accurate except for Detour Length, which was shown as 0-miles in the report. As described in the benefit-cost analysis (BCA) the detour length for the Neptune Drive bridges is 7-miles and the detour length for the Red Wheat Bridges is 2-miles.

## III. PROJECT BUDGET –SOURCES AND USES

The Project's budget is based on 90% design and a 20% contingency allowance has been applied to conservatively budget for cost increases which may occur due to industry cost escalations or other unknowns.

As shown in the tables below and reflective of the project's scope of work in the **Specific Improvements** section, the requested \$27.1 million BIP grant will fund 80% of the Project's total construction costs. All pre-construction costs have been or will be funded using State funds; no other federal funds are included in the budget.

**Table 2: Project Budget**

Use of Funds (costs in \$millions)	ODOT State Funds	Other Federal Funds	BIP Eligible Costs	Future Eligible Costs	Total Project Costs
<b>Previously Incurred Costs</b>					
▶ Design	\$2.00				\$2.00
▶ Environmental	\$0.06				\$0.06
▶ <b>Utilities</b>	\$3.84				\$3.84
<b>Future Eligible Costs</b>					
▶ Earthwork	\$0.12		\$0.49	\$0.61	\$0.61
▶ Traffic Control	\$0.07		\$0.28	\$0.35	\$0.35
▶ Lighting	\$0.38		\$1.50	\$1.88	\$1.88
▶ Staking	\$0.07		\$0.28	\$0.35	\$0.35
▶ Mobilization	\$0.23		\$0.91	\$1.14	\$1.14
▶ Construction	\$4.51		\$18.05	\$22.56	\$22.56
▶ Contingency	\$1.08		\$4.30	\$5.38	\$5.38
▶ Construction Inspection	\$0.32		\$1.29	\$1.61	\$1.61
<b>Total</b>	<b>\$6.78</b>		<b>\$27.10</b>	<b>\$33.88</b>	<b>\$39.78</b>
<b>Percent of Eligible Costs</b>	<b>20%</b>		<b>80%</b>		

The following table outlines the scope of work activity by funding source responsibility.

**Table 3: BIP Share of Funding by Scope Activity**

Scope of Work Activity	ODOT State Funds	BIP Grant Funds	Other Federal Funds
▶ Earthwork	20%	80%	0%
▶ Traffic Control	20%	80%	0%
▶ Lighting	20%	80%	0%
▶ Staking	20%	80%	0%
▶ Mobilization	20%	80%	0%
▶ Construction	20%	80%	0%
▶ Contingency	20%	80%	0%
▶ Construction Inspection	20%	80%	0%
<b>Total Future Project Cost</b>	<b>20%</b>	<b>80%</b>	<b>0%</b>

## Funding Commitment

As shown in the STIP, ODOT has programmed \$27.6 million in State funds for the larger I-40 at Exit 65 Interchange Project. As documented in the Funding Commitment Letter ([Attachment D](#)), the Department will utilize \$6.8 million from the following two programs to provide the 20% local match for this BIP application.

### Rural Economic Transportation Reliability and Optimization (RETRO) Program

ODOT has committed \$9.0 million in Rural Economic Transportation Reliability and Optimization (RETRO) Program funding for the larger I-40 at Exit 65 Project ([Attachment E](#)). In 2023 the Oklahoma Legislature appropriated \$200 million in RETRO funds to ODOT, which is the largest single appropriation to the Department in history. The funds focus on ensuring rural infrastructure supports and promotes robust economic development by addressing traffic safety and circulation difficulties attributed to increases in traffic volumes. The \$200 million was included as part of ODOT's annual rebalancing of the CWP. By combining the RETRO funds into the CWP, ODOT is able to advance expected project timeframes or fund additional infrastructure investments - more than the CWP originally planned for prior to the \$200 million in RETRO funds. This additional investment is intended to help better accommodate the needs of the system. Within the CWP, the RETRO funds are partnered with formula Federal funds and Oklahoma State Rebuilding Oklahoma Access and Driver Safety (ROADS) funds to ensure that RETRO funds make up no more than 50% of the total project cost, as specified in HB 1025X.

### Rebuilding Oklahoma Access and Driver Safety (ROADS) Fund

The ROADS fund was created by the Oklahoma State Legislature in 2005 to provide a dedicated revenue source to maintain and repair the Oklahoma's state highways and bridges. Since its inception in 2006, the ROADS fund have steadily increased to the legislatively defined maximum annual cap of \$590 million. Originally ROADS was funded from annual appropriations of income tax revenue in the General Fund. Beginning in 2020, funding sources for ROADS was expanded to include motor fuel and motor vehicle taxes.

### STIP Update

Finally, upon announcement that the Project has received a BIP Grant Award, ODOT will initiate the process to update the Project's programmed funding in the 2024 - 2027 STIP.

## Cost Overrun Plan

The potential for cost overruns is known and has been built into the 20% contingency included in the project budget, which is appropriate by Federal and State best practices for this level of design. The Project is included in ODOT's Eight Year CWP and the Department is committed to adjusting future CWP's as needed to meet all BIP and statutory deadlines for funding obligation and expenditure. Finally, ODOT's history has consistently shown a contract growth of less than 3%, which is covered by other formula federal funds or ROADS state funds.

## IV. MERIT CRITERIA

### Criterion #1: State of Good Repair

The project will improve the condition of bridges in in fair condition and at risk of falling into poor condition within the next three years.

Although rigorously maintained, the Red Wheat Drive and Neptune Drive Bridges are vulnerable to accelerated deterioration due to their advanced age and original design details. While the current NBI ratings for these structures (deck, superstructure, and substructure) range from “Fair” to “Satisfactory,” they are at risk of falling into poor condition within the next 3 years. **Figure 5** and **Figure 6** illustrate the constant maintenance needs associated with the bridges that require regular repairs and routine maintenance efforts.

ODOT routinely performs inspections to obtain a comprehensive and intensively detailed examination for an entire bridge structure. All four structures were most recently inspected in March 2023 and the results are included in [Attachment A](#).

**Table 4** summarizes the highest priority improvements identified in the most recent inspection. These items reflect conditions that, while not in need of immediate repair should probably be addressed within the next several weeks or months to prevent the issues from becoming a severe problem to a major structural component. Replacement of the Red Wheat Drive and Neptune Drive Bridges will eliminate these issues.



**Figure 5: Red Wheat Drive Bridge**



**Figure 6: Neptune Drive Bridge**

**The project will reduce maintenance costs.**

As demonstrated in the BIP BCA Tool ([Attachment F](#)), maintenance cost savings is projected to be over \$1.6 million for the Red Wheat Bridges and over \$2.2 million for the Neptune Bridges over the 30-year analysis period. Further, the Project will be incorporated into the annual Asset Management Plan evaluation process which will fund needed state of good repairs on an annual basis.

**The project will improve seismic protection to improve long-term resiliency.**

The Project will also improve the resiliency of at-risk infrastructure. The State of Oklahoma experiences damaging earthquakes and a significant increase in seismic activity has been observed since 2009 with the most significant increase between 2014 and 2015. In 2015, 887 magnitude three or higher earthquakes were recorded, which was an almost 52 percent increase from 2014. The Bridges are in an area with recent seismic activity. The Project will enhance the resiliency by replacing the currently structurally deficient bridges, thereby improving the emergency preparedness of the region. Replacing and implementing design principals to fortify the bridges is an additional step the community can take to increase their disaster preparedness. By providing more resilient infrastructure, the Project will address the potential disproportionate negative environmental impacts of an earthquake on the local disadvantaged community.

**Table 4: Red Wheat Drive and Neptune Drive Bridges Inspection Report: Summary of Significant Issues**

NBI #	Red Wheat Drive Bridges		Neptune Drive Bridges	
	14477	14478	17581	17582
	I-40 WB	I-40 EB	I-40 EB	I-40 WB
▶ Steel Open Girder/Beam			Beams need to be drilled again. S3, Beam 2 Diaphragm 3 has a cracked stiffener 13 1/2" long. S3 Beam 2 Diaphragm 4 has a crack 15 1/2" long	Holes have been drilled, two cracks. Cracks need to be arrested asap. No change to cracks this cycle.
▶ Reinforced Concrete Column	Severe cracking and spalling with exposed rebar at Piers 1, 2 and 3 north column	Moderate and severe spalling with exposed rebar. Moderate cracking		
▶ Compression Joint Seal	All joints are worn and leaking. Joints are failing			
▶ Pourable Joint Seal		Joints have minor failures throughout.	Joints have failed.	Joints have failed
▶ Elastomeric Bearing	A few pads are bulging with minor splits.			
▶ Steel (rail) Protective Coating				Paint system is failing. Surface rust throughout.
▶ Steel Open Gird End				Both flanges bent at west abutment.
▶ Steel Gird Under Construction Joint			Beams need to be drilled again. S3, Beam 2 Diaphragm 3 has a cracked stiffener 13 1/2" long. S3 Beam 2 Diaphragm 4 has a crack 15 1/2" long .	
▶ Steel Cracking/Fatigue				Holes have been drilled, two cracks. Cracks need to be arrested asap. No change to cracks this cycle.
▶ Pourable Fix Joint Seal		Joint is failing.		
▶ Steel Bearing Assembly		Two sheard anchor bolts		
▶ Concrete Cracking		Moderate cracking in deck, columns, caps, and approach slab.		

## Criterion #2: Safety and Mobility

### Safety

**Table 5** summarizes the most recent five years of accident data for the four structures included in the Project. As documented in the BCA, it is expected that replacing the Red Wheat Drive and Neptune Drive Bridges will improve safety on the bridges and bridge approaches due to implementing modern geometry, wider shoulders, enhanced barriers, and improved lighting. An engineering safety analysis was conducted for the larger I-40 at Exit 65 Project that incorporates the bridges and uses similar design features throughout. This analysis used methodologies described in the Highway Safety Manual (HSM) based on safety performance functions along with crash modification factors. This analysis estimated the overall reduction in crashes of about 17 percent, including 20-30 percent reduction in injury crashes and a 14 percent reduction in no injury/property damage only (PDO) crashes. Over the course of the 30-year analysis period, it is estimated that implementing modern geometry, wider shoulders, enhanced barriers, and improved lighting will generate approximately \$0.6 million in benefits.

**Table 5: Red Wheat Drive and Neptune Drive Bridges Accident Data: 2017 to 2021**

Bridge		Direction	PDO Crashes	Injury Crashes	Total Crashes
Red Wheat Drive Bridges	14477	WB	2		2
	14478	EB	1		1
Neptune Drive Bridges	17581	EB	4		4
	17582	WB	3	2	5
<b>Total</b>			<b>10</b>	<b>2</b>	<b>12</b>

The BCA also estimated the potential safety benefits that would be generated as a result of avoiding a detour route that would be required if the Red Wheat Drive or Neptune Bridges were closed to traffic due to safety concerns. As shown in **Figure 7** and **Figure 8**, the detour route for the Red Wheat Drive Bridges is nearly five miles longer and could take up to 10 minutes longer; for the Neptune Drive Bridges, the detour route is an additional 2 miles and takes up to 7 minutes longer. The BCA model evaluated the potential impact of the additional travel distance on accident rates along the two detour routes. The estimated annual benefits of avoiding these detour routes is \$2.9 million for each of the Red Wheat Drive Bridges and \$1.7 million for each of the Neptune Drive Bridges for a total benefit across all four bridges of about \$18.7 million.

Total safety benefits of the Project due to modernized bridge design and avoidance of detours are estimated at \$19.2 million over the 30-year analysis period.

Figure 7: Red Wheat Drive Bridges Detour Route

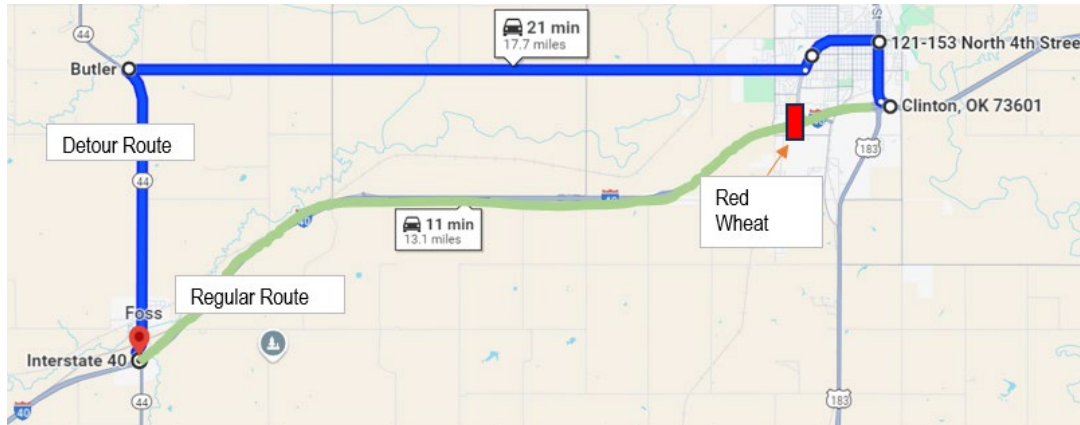
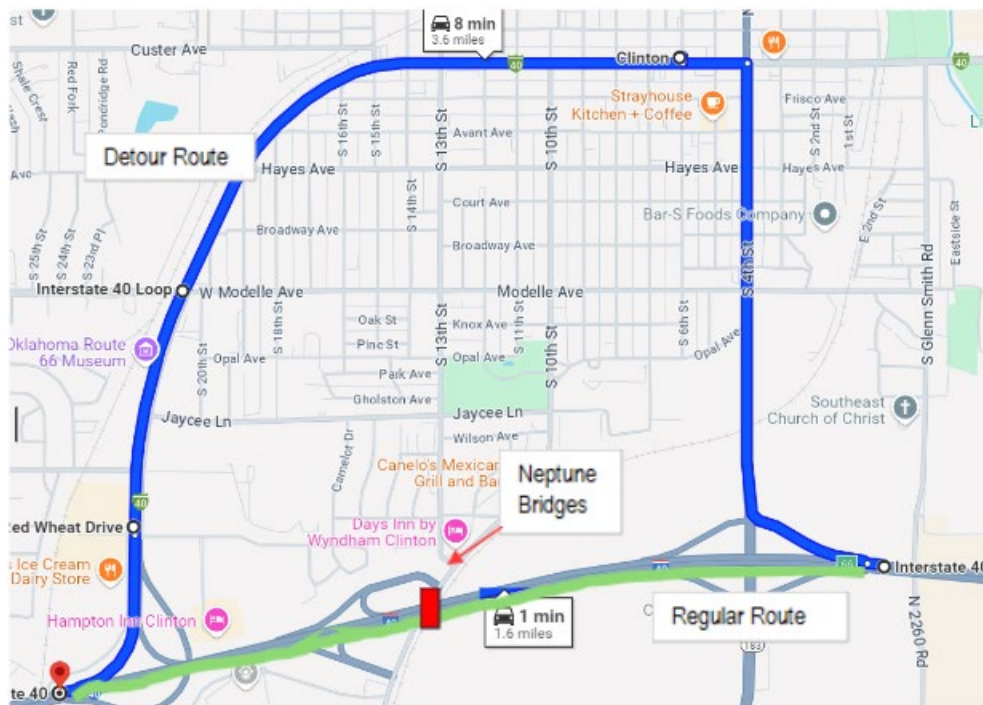


Figure 8: Neptune Drive Bridges Detour Route



### Person Miles Traveled Expected to be Impacted by the Project

For the forecasted opening year 2029, on an average day the Red Wheat Bridges are expected to impact an average of 609,000 person-miles and the Neptune Drive Bridges will impact 867,000 person miles. In 2040, the impacted person miles are projected to increase to 1.2 million miles and 1.7 million miles, respectively. The calculations for these estimates are provided in [Attachment G](#).



### Criterion #3: Economic Competitiveness and Opportunity

The project supports the creation of good-paying jobs directly related to the project and equitable access to those jobs.

The delivery of the Red Wheat Drive and Neptune Drive Bridges itself will directly create high-quality employment opportunities. The Project is located within a rural community designated as a Historically Disadvantaged Community. Residents in the Clinton area will benefit from the employment and economic opportunities created by the Red Wheat Drive and Neptune Drive Bridges and the larger I-40 at Exit 65 Project, including indirect benefits to local business providing goods and services to construction personnel. A 2021 study prepared for the American Road and Transportation Builders Association found that, for highways and bridges, the average direct spending of additional IJJA funds on infrastructure produces economic output (sales) with an overall multiplier of 3.4 nationally.<sup>1</sup> While this multiplier is subject to variation based on work scope, geography, and other contextual factors, it is a strong indicator that there will be tangible economic benefits at a local level from investment in interstate infrastructure.

Additionally, it is ODOT's policy to ensure equal opportunity and to prevent and eliminate discrimination in all of its activities, including the areas of construction, consultants, commodities, and professional services. ODOT carefully ensures its compliance responsibility in meeting the requirements for federal Civil Rights law on its Federal Aid-funded transportation projects, including requirements for the participation of Disadvantaged Business Enterprises (DBEs). ODOT is also fully committed to actively promoting Minority and Women-Owned Business Enterprises (MWBE) and Service-Disabled Veteran-Owned Business (SDVOB) opportunities. Participation goals will be set, results reported, and contracts monitored for this project. Further, ODOT incorporates targeted training provisions within its contracts to provide a mechanism which allows for underrepresented groups to become skilled in the various construction trades.

Annually, ODOT sponsors a free job fair where job seekers and job recruiters from all areas of the transportation industry (civil engineering, trucking, highway construction, and heavy equipment operations) are able to interact. There is a heavy emphasis during this fair to recruit women and minorities; a study published by the Today's Homeowner found that Oklahoma ranks in the top 25% of states with the highest rates of females with construction jobs. ODOT has a DBE goal of 16% and attained over 17% in 2023. In support of this, ODOT required contractors to follow the EEO program requirements. These efforts have increased the amount of money distributed to DBE's to nearly 40% from 2022 to 2023. ODOT is committed to ensuring that minorities and women are recruited and conducts contractor compliance reviews on projects to ensure compliance.

#### Freight Efficiency Improvements and Improves Supply Chain.

I-40 connects nine states from California to North Carolina. It is on the Primary Highway Freight System (PHFS) and carries high volumes of truck traffic throughout the country. Currently, the four bridges carry over 9,250 vehicles each day, with 12% of the traffic consisting of truck traffic. According to the [FHWA Freight Analysis Framework](#), by 2050 I-40 will carry the highest volume of trucks in the state with projected total daily traffic estimated to be **30,700 with 45%** of that traffic being trucks. Furthermore, the larger I-40 and Exit 65 Project is named in the [ODOT 2023-2030](#)

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<sup>1</sup> IHS Markit. "Economic impacts of Transportation Infrastructure- Macroeconomic, Industry and State-level Impact Analysis of the Additional Highway, Bridge, and Public Transit Spending in the Infrastructure Investment and Jobs Act." September 2021.

[Freight Transportation Plan](#) as an Eight-Year Financially Constrained Freight Investment Plan Project.

Freight is an integral part of the economy both nationally and locally. As reported in Oklahoma's Freight Transportation Plan, approximately 435.5 million tons of freight, worth over \$300 billion were transported within, from, or to the state in 2017. This freight consisted of critical goods which the people and business of Oklahoma rely on. By 2045 these numbers are expected to increase to 558.5 million tons and \$497.6 billion, an increase of nearly 28% and 60%, respectively. Building and improving infrastructure to accommodate this increase in freight is critical to the economy of the state and the local community. Ensuring that these bridges can accommodate the expected growth is imperative.

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*“Oklahoma is expected to add \$197.5 billion in value of freight moving into, out of, and within the state between 2017 and 2045 (a 66 percent increase). Trucking is forecast to increase by \$141.6 billion, accounting for 72 percent of the growth”<sup>2</sup>*

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The Project will help improve freight efficiency and supply chain flow both within the community of Clinton but also across the State. If repairs require lane closures more often due to the degrading infrastructure, regular freight traffic will be re-routed. As noted earlier, the detour route for the Red Wheat Drive Bridges is nearly five miles longer and could take 10 minutes longer; for the Neptune Drive Bridges, the detour route is an additional 2 miles and takes up to 7 minutes longer. Avoiding these potential detours will ensure efficient freight movement to and from manufacturers and distribution centers within Clinton, including a Pepsi bottling center, ready mix concrete supplier, semi-truck manufacturer, and meat wholesaler. From the BCA, the detour avoidance generated the largest Project benefit with \$99.0 million in benefits related to travel time savings.

Finally, the Project will also benefit future freight rail goods movements. The vertical clearance over the railroad along Red Wheat Drive is inadequate by 9-feet (**Figure 9**). The new bridges have been designed to accommodate the 23'-6" clearance over the railroad right-of-way per the Union Pacific Railroad-BNSF Railway Guidelines for Railroad Grade Separation Projects. This increase will provide the FMRC RR an opportunity to move freight in larger cars in the future.

**Figure 9: Red Wheat Drive Bridges Vertical Clearance**



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<sup>2</sup> [ODOT 2023-2030 Freight Transportation Plan](#)

### Criterion #4: Climate Change, Sustainability, Resiliency, and the Environment

#### Reduction in air pollution and greenhouse gas emissions

Reducing the minutes of delay due to frequent repairs on the bridge will reduce the amount of idling time vehicles spend stuck in traffic and thus the level of emissions produced from delays. Implementing the Project will eliminate the need to close the bridges due to safety concerns. Based on the detour avoidance analysis that is included in the BCA, implementation of the Project will generate the following annual CO2 and non-CO2 emission reduction benefits in **Table 6**.

**Table 6: Detour Avoidance Benefit: Emission Reduction Benefits (2022\$ in millions)**

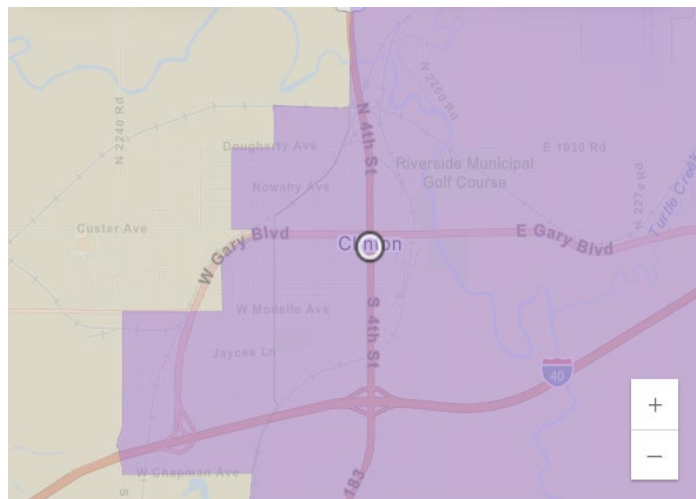
Bridge		Direction	CO2	Non-CO2 Emissions
Red Wheat Drive Bridges	14477	WB	\$4.1	\$0.5
	14478	EB	\$4.1	\$0.5
Neptune Drive Bridges	17581	EB	\$2.1	\$0.3
	17582	WB	\$2.1	\$0.3
<b>Total</b>			<b>\$12.5</b>	<b>\$1.5</b>

### Criterion #5: Equity and Quality of Life

The Project, in the context of being a critical element of the I-40 at Exit 65 Project, will directly benefit historically disadvantaged populations located directly north and south of I-40 (**Figure 10**).

As noted earlier, the replacement of the Red Wheat Drive and Neptune Drive bridges is a critical part of the larger I-40 at Exit 65 project which will include the reconstruction and reconfiguration of interchanges and intersections that will enhance access to the locations north and south of I-40. The proposed actions of the larger project include relocating the existing ramps at the I-40/Neptune interchange due to their proximity to the Gary Boulevard and reconstructing the existing partial interchange on I-40/Gary Boulevard to a full Diamond. Currently, there is no east bound access to I-40 at the I-40/I-40B interchange, and the northbound exit ramps end at the intersection of Gary Boulevard and Lexington/Oliver Avenue creating traffic flow issues. The intersection of Gary Boulevard and Lexington/Oliver Avenue was targeted due to crash history, intersection layout, and proximity to the I-40/I-40B interchange. The benefits resulting from improvements to these changes include consolidating ramp access at the interchanges, eliminating weaving resulting from the tightly spaced ramps, improving roadway geometry to meet modern design standards, and providing connectivity via the one-way frontage road/protected turnaround system. Additionally, two 8'-8" sidewalks on each side of the realigned Gary Boulevard will be implemented to provide a new north-south pedestrian connection under I-40.

**Figure 10: Historically Disadvantaged Community**



These future improvements not only speak to needed investment to improve mobility, access, and quality of life for the people living within Clinton as well as those visiting and traveling through, but also to the importance of first investing in the bridges which carry traffic along I-40. The bridges will support the future investment of this area, enhancing people's access to essential amenities and daily destinations as well as ensuring their safety during that travel.

**The Red Wheat Drive and Neptune Drive Bridges, as part of the larger I-40 at Exit 65 Project will ensure that future investment in the area is effective and long-lasting, and that the community's transportation, safety, and access needs are sufficiently met.**

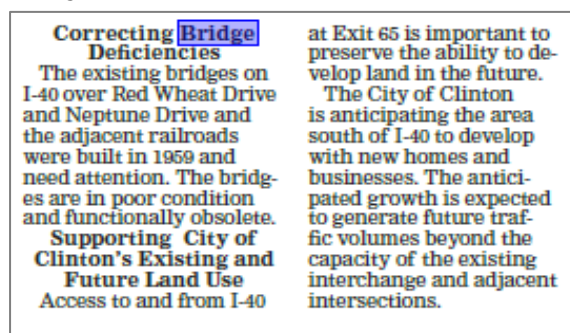
**Proactively addresses equity and barriers to opportunities.**

The project area is considered to be disadvantaged as ranked by the USDOT ETC Explorer. The area is disadvantaged in all Health Vulnerability areas including 90<sup>th</sup> percentile or higher for asthma prevalence, high blood pressure, diabetes, and low mental health and in the 74<sup>th</sup> percentile for cancer prevalence. The area is also disadvantaged in Social Vulnerability and is above the disadvantaged threshold in the number of people living at or below the 200% poverty line, unemployment, no high school diploma, uninsured, lack of internet access, the number of residents who are 17 or younger, limited English proficiency, and those living in mobile homes. According to the CEJST, the project area is also considered disadvantaged in workforce development, with low levels of English proficiency and high school graduation rates, low income, and low life expectancy. Improving reliable access to essential amenities is critical to these populations.

**Improved access to critical community services (jobs, healthcare, grocery, schools, places of worship, recreation)**

The existing interchanges and planned new interchange accessed via the Red Wheat Drive and Neptune Bridges provide access to critical community services for residents and visitors. The larger I-40 at Exit 65 Project will improve reliable access to the area south of I-40 which includes the primary industrial and manufacturing centers of the Clinton area and is one of the top employment centers for city residents. Single family home development is also anticipated in this area (**Figure 11**). A church is planned in the northwest of the project area. Additionally future development is expected to include a grocery store. Currently, critical grocery centers are located off of both Neptune Drive and West Gary Boulevard. Other major grocery, goods, and essential services such as hospitals are all primarily located north of I-40. Residents of the anticipated housing south of I-40 will need reliable and efficient access to essential destinations and services including grocery stores, schools, and parks. This access will be enhanced with the implementation of the larger I-40 at Exit 65 project and the sidewalks along Gary Boulevard. Furthermore, should the bridges fail, emergency vehicles would be required to reroute to access the Clinton Regional Hospital at the northwest side of the city or the Clinton Indian Health center in the East.

**Figure 11: Newspaper Clip: The Clinton Daily News, 2020**



## Public Engagement

ODOT has engaged diverse people and stakeholders as part of the project development process and will continue to do so throughout the implementation of the Red Wheat Drive and Neptune Drive Bridges. [Attachment H](#) provides a summary of the public engagement activities completed to date and reflect the wide range of stakeholders and methods of outreach, including in-person and internet-based communication that have been used to share information about the project, encourage discussion, and gather input from affected or interested groups and individuals, including individuals in the historically disadvantaged community.

Public engagement activities have been on-going since PE started in May 2015. A key element of the public engagement plan was reaching non-English speaking communities in the study area. Within Clinton, approximately 8% of the population has limited English proficiency. To connect with this segment of the population, public engagement materials were translated to Spanish as this is the largest spoken language among this population.

ODOT held public meetings in May 2016 and February 2019 during the PE and NEPA process which resulted in refinements to the alternatives under consideration. Additionally, a virtual public open house was held between December 2 and 21, 2020 to provide the public an opportunity to comment on the PE Study results. All meetings were well advertised with comprehensive notifications and delivery of materials to all addresses within the study area. The meetings included translated materials to give limited English proficiency individuals more equitable involvement in the meetings. The public will continue to be given the opportunity to contribute meaningful involvement as the I-40 at Exit 65 project moves into construction.

Stakeholder outreach included the Governor's office, elected officials (federal and state), FHWA, Oklahoma Transportation Commissioner, Custer County Commissioners, the City of Clinton, Clinton Chamber of Commerce, Route 66 Museum, local school districts, emergency service providers, post offices, medical facilities, and airports in the project area. [Attachment I](#) provides stakeholder letters of support.

## Criterion #6: Innovation

### Innovative Finance:

The committed local matching funds reflect a non-traditional transportation revenue source within the State of Oklahoma. More specifically, in 2021 the State Legislature passed House Bill 1025X which established the RETRO funding program. The RETRO program is administered by ODOT, is not subject to fiscal year limitations and consists of general revenues. The objective of the RETRO funding program is to assist ODOT in equitably prioritizing the construction, repair, and maintenance of state highways in rural areas where robust economic development has resulted in traffic safety and circulation difficulties attributed to significant and unanticipated increases in traffic volumes. Eligible projects are to be implemented in counties with a population of less than seventy-five thousand (75,000) where traffic volumes have increased to become so impaired or hazardous as to constitute a threat to the safety of persons or property traveling over or upon such highways.

## V. BENEFIT-COST ANALYSIS

The Project generates benefits that exceed its costs, and therefore results in a quantified net benefit to society. The BIP BCA Tool identified in the NOFO was used to generate the benefit cost ratio (BCR) and is included in [Attachment F](#). The monetization of the main benefits resulting from the proposed improvements are summarized in **Table 7**. As shown in the table, the Project’s most significant benefits are related to the detour avoidance and include travel time savings, vehicle operating cost (VOC) reductions, and carbon dioxide (CO2) emission reductions. Additional safety benefits reflect applying the crash modification factors for adding the inside shoulder and enhancing the safety barrier, and annual maintenance savings based on the elimination of intermittent O&M costs and major repairs with the implementation of the scope of work.

**Table 7: BIP BCA Tool Benefit Estimates, 2022 Dollars (in millions)**

Category	Red Wheat Drive / FMRC Railroad Bridges		Neptune Drive / GNBC Railroad Bridges		Total	% of Total Benefits
	14478 (I-40 EB)	14477 (I-40 WB)	17581 (I-40 EB)	17582 (I-40 WB)		
▶ Safety	\$5.9	\$5.9	\$3.5	\$3.9	<b>\$19.2</b>	10.6%
▶ Travel Time	\$31.8	\$23.4	\$21.0	\$22.7	<b>\$98.9</b>	54.7%
▶ VOC	\$12.9	\$13.1	\$5.6	\$5.5	<b>\$37.1</b>	20.5%
▶ CO2 Emissions	\$4.1	\$4.1	\$2.1	\$2.1	<b>\$12.5</b>	6.9%
▶ Non-CO2 Emissions	\$0.5	\$0.5	\$0.3	\$0.3	<b>\$1.5</b>	0.8%
▶ Other Environmental	\$0.0	\$0.0	\$0.1	\$0.1	<b>\$0.1</b>	0.1%
▶ Maintenance	\$1.1	\$1.1	\$1.4	\$1.4	<b>\$5.1</b>	2.8%
▶ Residual Value	\$1.3	\$1.2	\$2.0	\$2.0	<b>\$6.4</b>	3.6%
<b>Total Benefits</b>	<b>\$57.5</b>	<b>\$49.4</b>	<b>\$35.9</b>	<b>\$37.9</b>	<b>\$180.8</b>	100.0%
<b>Total Discounted Costs</b>	<b>\$6.8</b>	<b>\$6.3</b>	<b>\$10.3</b>	<b>\$10.4</b>	<b>\$33.9</b>	
▶ <b>BCR</b>	<b>8.5</b>	<b>7.8</b>	<b>3.5</b>	<b>3.6</b>	<b>5.3</b>	
▶ <b>Net Present Value (NPV)</b>	<b>\$50.7</b>	<b>\$43.1</b>	<b>\$25.6</b>	<b>\$27.5</b>	<b>\$146.9</b>	

## VI. PROJECT READINESS AND ENVIRONMENTAL RISK

### Technical Feasibility and Technical Competency

ODOT has the technical capacity and competency to successfully complete this Project. ODOT has a close partnership with the FHWA Oklahoma Division, through which it receives federal aid allocation and discretionary grant funding. ODOT has also been awarded discretionary grants from a variety of programs and is familiar with developing grant agreements, administering funding, and conducting necessary reporting as required. Furthermore, ODOT has the technical expertise and resources dedicated to the Project to provide quality control over all aspects of design and construction, ensure the Project meets all federal requirements, and keep the public informed of the Project's progress.

The Project has been developed based on information gathered from bridge inspections and in conjunction with the larger I-40 at Exit 65 Project. Details on the proposed work can be found in the **Specific Improvements section**. The cost estimate included in the **Project Budget section** is based on 90% design assumptions, and notably includes a 20% contingency which is appropriate for the level of design completed to date.

### Federal Requirements

ODOT adheres to the FHWA-approved guidance and standards contained in ODOT's *Project Development Manual*, *Highway Design Manual*, and the *Structures Design Manual*. Other FHWA- and State-approved guidance manuals, such as the *Manual of Uniform Traffic Control Devices*, will be applied, as appropriate, to the Project.

Additionally, the Project will comply with applicable Federal requirements including, but not limited to, Buy America provisions, ADA regulations, Civil Rights requirements, Federal Motor Vehicle Safety Standards (FMVSS), and/or the Federal Motor Carrier Safety Regulations (FMCSR).

ODOT's Contract Compliance Division oversees the Department's (DBE program and ensures that ODOT, as well as all its consultants and contractors, comply with applicable Civil Rights requirements. Additionally, ODOT ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation, or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by ODOT, its recipients, sub-recipients, and contractors. ODOT complies with Title VI by developing a [Title VI Implementation Plan](#), conducting internal and external compliance reviews, providing training for staff, suppliers, vendors, contractors, local governments, and other ODOT sub-recipients of federal funds, and developing Title VI compliance information for internal and external dissemination.

### Project Schedule

Major project milestones and anticipated completion dates are identified in the table below. All necessary activities will be completed to allow FY 2025 BIP grant funds to be obligated sufficiently in advance of the statutory deadline of September 30, 2028, and expended significantly earlier than the statutory deadline of September 30, 2033. With receipt of BIP grant funding, ODOT will start construction in August 2025 and complete construction in August 2028.

While there will be right-of-way acquisitions and the need for utility agreements for the larger I-40 at Exit 65 Project, to implement the Red Wheat Drive and Neptune Drive Bridges, no real property

or right-of-way acquisitions are needed as all work will be completed within the existing right-of-way and no railroad or utility agreements are needed.

Public involvement outreach to stakeholders started over eight years ago and will continue to be conducted for the duration of the Project.

**Table 8: Project Schedule**

Project Milestone	Start Date	End Date
▶ Preliminary Engineering	May 2015	November 2022
▶ NEPA	August 2021	November 2022
▶ State Environmental Review	N/A	
▶ Public Engagement Process	March 2016	March 2021
▶ Incorporated into ODOT’s 2024-2027 Statewide Transportation Improvement Program <sup>(1)</sup>	April 2024	
▶ Incorporated into ODOT’s 2025-2032 Eight-Year Workplan	October 2024	
▶ Final Design: Plans, Specifications, and Estimates	August 2021	February 2025
▶ Complete Consultations with Regulatory Authorities	Captured during NEPA	
▶ Environmental Permitting – 404 Permit		October 2023
▶ Utility Agreements	N/A	
▶ Agreements with Railroad	N/A	
▶ Real Property / Right-Of-Way Acquisitions Completed (None Required)	N/A	
▶ BIP Grant Funds Obligated <sup>(2, 3)</sup>	January 2025	April 2025
▶ Project Letting	May 2025	
▶ Construction	August 2025	August 2028

**Notes:**

1. Refer to application *Project Budget* section.
2. All necessary activities will be completed to allow FY 2025 BIP grant funds to be obligated substantially in advance of the programmatic administrative deadline (September 30, 2028).
3. BIP funds will be spent expeditiously once construction starts, with all funds expended approximately five years earlier than the programmatic September 30, 2033 deadline.



## Required Approvals

### Environmental Permits and Reviews

- ▶ **National Environmental Policy Act:** ODOT and FHWA executed a Documented Categorical Exclusion (DCE) in November 2022 ([Attachment C](#)).
- ▶ **Section 404 Permit:** A Section 404 permit was obtained in October 2023 ([Attachment J](#)).

As documented within the 2022 DCE, there is no need for additional environmental permits based on consultations with the following:

- ▶ State Historic Preservation Office (SHPO)
- ▶ State Archaeologist
- ▶ US Fish and Wildlife Service (USFWS)
- ▶ Natural Resources Conservation Services (NRCS)

However, prior to the selected contractor starting construction, they will be required to a construction stormwater permit (OKR10) from the Oklahoma Department of Environmental Quality.

## Federal Transportation Requirements Affecting State and Local Planning

The four NBI structures identified for replacement within the Project's scope of work, as part of the larger I-40 at Exit 65 Project, are incorporated into or are consistent with the following plans:

- ▶ [ODOT Long Range Transportation Plan](#)<sup>3</sup>
- ▶ [ODOT 2023-2030 Freight Transportation Plan](#)
- ▶ [ODOT 2024-2027 Statewide Transportation Improvement Program](#)
- ▶ [ODOT 2025-2032 Construction Work Plan](#)
- ▶ [ODOT Transportation Asset Management Plan](#)<sup>1</sup>

## Assessment of Project Risks and Mitigation Strategies

ODOT uses a systematic approach to risk management throughout the project development process to minimize costs and avoid potential contract complications or disputes. An assessment of risks that are known at this time has been developed and is shown in the table below. This risk assessment will be regularly monitored and updated as the Project moves forward.

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<sup>3</sup> Policy documents that that provides a strategic direction for the development and maintenance of the Oklahoma multimodal transportation system. The Project aligns with ODOT's strategic direction in this plan.

**Table 9: Risk Assessment Synopsis**

Identified Risk (Probability of Occurrence)	Mitigation Strategies
<p><b>Cost Increases (Moderate)</b></p>	<ul style="list-style-type: none"> <li>▶ Cost increases have become more common with rising inflation. Project estimates were completed in October 2024 and are based on 90% design. All estimates include a 20% contingency.</li> <li>▶ ODOT has included the project in its 8 Year CWP and remains committed to adjusting the CWP as needed to meet all BIP and statutory deadlines for funding obligation. ODOT has consistently seen a contract growth of less than 3%, which could be covered by other federal formula funds or Oklahoma State ROADS funds.</li> </ul>
<p><b>Weather Related Construction Delay (Moderate)</b></p>	<ul style="list-style-type: none"> <li>▶ The Project schedule includes a time allowance for weather variations that may impact construction activities.</li> </ul>
<p><b>Community Concerns (Low)</b></p>	<ul style="list-style-type: none"> <li>▶ Extensive public engagement has already occurred to date; the public is in support of the Project. ODOT will continue to communicate openly with the public and other key Project stakeholders throughout the construction process. See Criterion 5 of the Merit Criteria for more public engagement details.</li> </ul>

## VII. ADMINISTRATION PRIORITIES AND DEPARTMENTAL STRATEGIC PLAN GOALS

### Safety

The Project will enhance safety for motorized users. The implementation of increased shoulder width, LED lighting and safety barriers are expected to result in a reduction of property damage, fatalities, and/or serious injuries and to bring the accident rates below the statewide average. Further, the proposed solutions are consistent with the goal of “taking substantial, comprehensive action to significantly reduce serious and fatal injuries on the Nation’s roadways,” outlined in USDOT’s 2022 National Roadway Safety Strategy (NRSS).

### Climate Change and Sustainability

The Project supports regional efforts to combat climate change by reducing vehicle emissions attributed to detour avoidance and lane closures. Based on the BIP BCA Tool, reducing the minutes of delay due to frequent repairs on the bridge will reduce the amount of idling time vehicles spend stuck in traffic and thus the level of emissions produced from delays. Implementing the Project will eliminate the need to close the bridges due to safety concerns. Based on the detour avoidance analysis that is included in the BCA, implementation of the Project will generate CO2 and non-CO2 benefits of \$12.3 million and \$1.5 million, respectively, over the analysis period of 30 years.

### Equity

The Project, in the context of being a critical element of the larger I-40 at Exit 65 Project, will directly benefit Clinton’s designated Historically Disadvantaged Community. The benefits resulting from these improvements not only speak to needed investment in this infrastructure to improve mobility, access, and quality of life for the people living within Clinton as well as those visiting and traveling through, but also to the importance of first investing in the bridges which carry traffic along I-40. The bridges will support the future investment of this area, enhancing people’s access to essential amenities and daily destinations as well as ensuring their safety during that travel.

## Workforce Development, Job Quality, and Wealth Creation

ODOT is committed to supporting good-paying jobs and strong labor standards while complying with both Federal and Oklahoma laws.

### Oklahoma Unified Certification Program for Disadvantaged Business Enterprises

ODOT serves as the Unified Certification Program (UCP) for the State of Oklahoma, providing a one-stop-shop where disadvantaged businesses that meet the DBE certification requirements and become certified are eligible to be used to meet the DBE goal requirements on any project with funding from the USDOT. ODOT's 2023-2025 Triennial DBE goal is 16.0 percent and the FFY 2023 goal attainment was 17.33 percent. Total dollars to DBEs increased almost 40 percent from 2022 to 2023. Oklahoma's project-level goal setting is data-driven utilizing current DBE certification information and historical DBE pay item performance to identify the project goal achievement possibility. ODOT offers DBE Supportive Services to help certified DBE firms in Oklahoma develop into self-sufficient businesses, capable of competing on federally funded highway projects. These services, provided under FHWA guidelines, aim to increase the number of active minority businesses in the highway program and contribute to their growth and self-sufficiency. ODOT's commitment includes offering various forms of training and technical assistance, all free of charge.

ODOT strives to ensure equal opportunities and to level the playing field for Disadvantaged Business Enterprises by providing full and meaningful participation opportunities on our federally funded projects. ODOT conducted a [Disparity Study](#) in 2021 to evaluate DBE opportunities and the Department is using the input to develop innovative solutions to strengthen the DBE program.

### Transportation Assistance Program

The ODOT Contract Compliance Division recently hosted a Transportation Assistance Program (TAP) at the Eastern Oklahoma County Technology Center during late October/early November of 2023. TAP is a free, week-long, job training program that specifically prepares women and people of color seeking jobs for their entry into the transportation and construction job market. TAP also provides valuable certification training opportunities that businesses look for when hiring individuals in the transportation and construction trades. The program includes direct experience and free certification in forklift operation/safety, work zone flagging, CPR/First Aid/Bloodborne Pathogen training, OSHA 10-Hour Construction, and workforce skills.

## VIII. DOT PRIORITY SELECTION CONSIDERATIONS

### Plans to improve the condition of bridges in poor condition or in fair condition and at risk of falling into poor condition within the next 3 years.

The Project's four bridges were built in 1959 and 1969 and are currently rated in fair condition due to industry leading means and methods and constant maintenance actions that the ODOT has performed. However, even with ODOT's robust maintenance actions, the structures are at an elevated risk of falling into poor condition within the next three years. As shown in [Attachment A](#), the most recent inspection in March 2023 highlights that such critical issues will result in accelerated deterioration.

## **Demonstrates but for a BIP grant the project sponsor(s) will be unable to complete the Bridge Project**

The receipt of a BIP grant award will allow ODOT to reallocate Federal-aid formula funds that will accelerate construction of other needed improvement projects within District 5 that would not be eligible or competitive for federal discretionary grant programs.

**The applicants are a Federal Land Management Agency (FLMA) that owns the bridge and a State, and Bridge Project application provides evidence that upon completion of the project, the bridge will be divested.**

N/A

**The project is or will be ready to proceed to the next stage of project delivery within 12 months of a CE Determination, FONSI, or ROD.**

ODOT and FHWA executed a Documented Categorical Exclusion in November 2022 ([Attachment C](#)). The Project will move to construction within 12 months of receipt of BIP funding.

**The project includes accommodation for transit and/or multi-modal transportation such as the inclusion of bus rapid lanes on the bridge and pedestrian/bicycle facilities.**

As noted earlier, within Oklahoma, pedestrians and bicyclists are not allowed to operate within the I-40 right-of-way. However, there are future plans to construct two 8'-8" sidewalks on each side of the realigned Gary Boulevard which is part of the greater I-40 at Exit 65 Interchange Project. These sidewalks will provide a new north-south connection under I-40 for the community. While the Project will not directly provide accommodation for bicyclists or pedestrians, it will support those improvements on future elements of the larger project. While no dedicated transit facilities will be implemented as part of the Project, passengers that utilize intercity bus services provided by Greyhound and local demand response transit services provided by Clinton Transit will benefit from the new structures and incur travel time saving benefits from future detour avoidance.

**The Project considers Workforce Development, Job Quality, and Wealth Creation.**

Every ODOT-awarded construction contract is subject to the strong and well-established provisions of State Labor Law. On contracts financed with Federal Aid, any provisions of the State Labor Law that conflict with mandatory Federal-Aid construction contract compliance requirements, as contained in 23 CFR 635.11, are superseded. To the benefit of workers, State Labor Law provisions that are more restrictive than the Federal-Aid construction contract compliance requirements, or the Davis-Bacon Act, and are not in conflict with them, continue to apply.

Additionally, Prevailing Wage Schedules, defined for each project based upon County of work, are issued by the Oklahoma State Department of Labor for all general construction public works projects. These wage rates are monitored for conformance during construction and strictly enforced.

**Without the BIP grant, construction of the project is unlikely to commence before September 30, 2031.**

BIP Grant funding will supplement the ODOT's existing funding to ensure that the time-sensitive and necessary improvements can begin in August 2025 and are completed by August 2028. As noted earlier, the BIP grant award will also allow ODOT to reallocate Federal-aid formula funds and accelerate construction of other needed improvement projects within District 5 that would not be eligible or competitive for federal discretionary grant programs.