

Project Readiness

Environmental Risk

Figure 1 shows the remaining project development and construction schedule for the US-75/W. 81st Street Interchange. As described in the Project Description, ODOT completed an Environmental Assessment (EA) for the US-75 corridor in 2002. A NEPA Reevaluation of the 2002 US-75 EA was completed in 2018 (see below and project website at [US-75/81st BUILD](#)). ODOT will complete additional public involvement and an updated NEPA Reevaluation to confirm that the project is still consistent with the original NEPA approval. 90% plans will be completed in February 2025. Right-of-way acquisition and utility relocations are underway and are anticipated to be completed by March 2025 and PS&E plans by June 2025. BUILD funds will be obligated in summer of 2025, as shown in **Figure 1**, concurrent with letting, so that the project may begin construction upon obligation of grant funds. Construction is anticipated to begin in September 2025 and be completed by March 2027.

US-75/W. 81st Street Interchange Project				
Task	2024	2025	2026	2027
Public Involvement				
90% Plans				
R/W Acquisition/Utility Relocation				
PS&E				
BUILD Grant Funding Obligation				
Authorization and Letting				
Contracting/Flex Time				
Construction				

Figure 1: Schedule for the US-75/W. 81st Street Interchange Project

The project is sufficiently advanced to begin construction in a timely manner and well within the funding deadlines for the 2025 BUILD program. Even with a significant unanticipated delay, the BUILD funds are in little danger of expiring prior to the obligation deadline (September 30, 2029), and construction will be completed well in advance of the expenditure deadline (September 30, 2034).

Required Approvals

Environmental Permits and Reviews

Construction of the US-75/W. 81st Street Interchange was authorized by the NEPA EA completed by ODOT in 2022. A reevaluation of this EA was completed and approved by FHWA in 2018. At that time, the project included only replacement of the US-75 bridges over W. 81st Street to correct the horizontal and vertical clearances. However, given the anticipated growth in the area and the expected congestion with the existing diamond configuration, ODOT redesigned the project to incorporate the diverging diamond interchange (DDI) configuration. In addition, ODOT partnered with the City of Tulsa to include the W. 81st Street improvements with the interchange. Combining

these projects will improve the operation of the interchange and will mean only one construction project instead of two for the traveling public.

ODOT intends to verify NEPA prior to letting to ensure the project is still consistent with the original approval. This update consists of a short checklist at the 90% plan submittal. No environmental impacts were identified in the 2018 Reevaluation. Environmental notes are limited to minimizing tree removal to the limits of construction and avoiding bridge removal during the migratory bird nesting season¹. All lighting will be designed to be downward facing to avoid impacts to listed bat species. An updated noise study was completed in June 2023.² No noise impacts were identified. This noise study and the original EA and 2018 Reevaluation are available at [US-75/81st BUILD](#).

Permitting

The project may require a Section 404 Clean Water Act permit from the US Army Corps of Engineers (USACE). Permitting for these projects is expected to fall under Nationwide Permit 14. Coordination with the USACE was completed with the original EA, and ODOT received a Section 404 permit from the USACE in June of 2018, associated with the bridge replacement project. This permit will be updated for the DDI project if necessary; however, impacts to jurisdictional waters and wetlands are not anticipated. ODOT has agency liaisons in place at the USACE, which greatly accelerates and improves the consistency of permitting reviews. The project may also require notifying the Federal Aviation Administration (FAA) of proposed construction via FAA Form 7460-1 prior to construction, in accordance with 14 CFR 77.13– 7.17 due to the location of Riverside Airport within 4 miles of the project location. Finally, the contractor will be required to obtain authorization under the Oklahoma Department of Environmental Quality (ODEQ) OKR10 general construction permit for stormwater. This permit is obtained after letting and before construction begins.

Right-of-Way Acquisition

Relocations will not be required for the US-75/W. 81st Street Interchange Project. A small amount of right-of-way (approximately ¼ acre) is needed for the widening and multiuse trail improvements on W. 81st Street. The City of Tulsa has initiated the acquisition of this property and will coordinate the required utility relocation by March 2025. The City of Tulsa will perform all right-of-way acquisition according to the Uniform Relocation Act and applicable regulations.

Public Engagement

Public engagement on the US-75 corridor originally occurred as part of the Major Investment Study and EA in 2002, including a formal public hearing. ODOT requested input from tribes, and local, city, state, and federal agencies. Many changes to regulations, policies, and best practices for public involvement have occurred since that time, and ODOT intends to perform additional public outreach specific to the US-75/W. 81st Street interchange. ODOT recently completed a successful virtual public open house for another proposed DDI in Tulsa and intends to hold both an in-person and virtual public open house for the current project.

State and Local Approvals

The US-75/W. 81st Street Interchange Project is currently included in the [INCOG FY 2024-2027 Transportation Improvement Program \(TIP\)](#) and the [ODOT Statewide Transportation](#)

¹ Notes related to the American Burying Beetle are no longer applicable. The ABB was downlisted 2020.

² Per 23 CFR 772 and ODOT Noise Policy (2011)

[Improvement Program \(STIP\)](#), as well as the [ODOT 8-Year Construction Work Plan](#). The City of Tulsa has reviewed the project design at all phases to verify it meets local requirements for city streets, drainage, and lighting.

Federal Transportation Requirements Affecting State and Local Planning

ODOT Statewide Freight Transportation Plan: US-75 is listed as a critical freight corridor in ODOT's [Freight Transportation Plan, 2023-2030](#) and is included in ODOT's Freight Investment Plan.

INCOG Regional Transportation Plan (RTP): The INCOG RTP, [Connected 2050](#), includes the widening of US-75 from SH-167 north to I-244 to 6 lanes, and the widening of W. 81st Street to 4 lanes. The US-75/W. 81st Street Interchange project is consistent with this plan, as the new US-75 bridges will be 70 feet wide in each direction, sufficient to accommodate the future lanes. The project is consistent with the Connected 2050 goals of safety, infrastructure condition, congestion, freight movement and economic vitality, and environmental viability and resilience.

INCOG GO Plan: The INCOG [GO Plan](#) is the pedestrian/bicycle master plan for the Tulsa area. The US-75/W. 81st Street Interchange Project is consistent with this plan and provides additional improvements. The Go Plan identifies W. 81st Street from west of Union Avenue to US-75 as a signed bicycle route. The Project will provide a multiuse paved trail.

Statewide Transportation Improvement Program (STIP): The [ODOT STIP](#) incorporates the first four years of the ODOT 8 Year CWP. Construction of the Project is included in the STIP.

Long Range Transportation Plan (LRTP): The [ODOT LRTP 2020-2045](#) is a policy document that provides a strategic direction for the development of the Oklahoma multimodal transportation system. The US-75/W. 81st Street Interchange Project aligns with ODOT's long range strategic direction.

Transportation Asset Management Plan (TAMP): The project is consistent with the goals set out in ODOT's [2022-2031 Transportation Asset Management Plan](#) with the goal of maintaining and preserving Oklahoma's transportation network.

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**. References to other sections of this application are included. Environmental and right-of-way related risks are minimal given that NEPA approval has been obtained and right-of-way acquisition by the City of Tulsa is underway. Meaningful public involvement has occurred that engaged communities affected by the project and additional outreach will be completed. ODOT has sufficient capacity to implement the proposed activities according to the schedule presented. The agency has committed state matching funds ensuring ODOT is able to begin construction in a timely manner until grant funds are reimbursed.

Table 1: Project Risk and Mitigation Strategies

Project Risk (Probability of Occurrence)	Mitigation Strategies
Cost Increases (Moderate)	<ul style="list-style-type: none"> - Cost increases have become more common with rising inflation. Project estimates were completed in March of 2023 and have been adjusted accordingly. - ODOT has included the project in its 8 Year Work Plan and remains committed to adjusting as needed to meet all BUILD and statutory deadlines for funding obligation and expenditure. See Budget Narrative. - Construction estimates are complete to a 65% level and contain 15% contingency, allowing for a margin of increase. - Any cost overruns will be covered by shifting funds from other projects programmed in later years in ODOT's 8-Year Work Plan. Funding imbalances are addressed yearly during the 8-Year Plan updates. - Historically, ODOT has had less than a 3% overrun on construction projects.
Delays Securing Right-of-Way (Moderate)	<ul style="list-style-type: none"> - NEPA will need to be updated to account for the needed right-of-way acquisition. This is a small area (1/4 acre) and contains no structures. See Project Readiness.
Section 404 Permitting Delays (Low)	<ul style="list-style-type: none"> - The Project is anticipated to fall under Nationwide Permit 14 and is unlikely to require mitigation. - ODOT has a liaison in place at the USACE to accelerate and streamline approvals if needed. See Project Readiness.
Weather Related Construction Delays (Moderate)	<ul style="list-style-type: none"> - ODOT works closely with contractors to renegotiate project time while still meeting project commitments.
Public Opposition (Moderate)	<ul style="list-style-type: none"> - The US-75/W. 81st Street project will provide additional connectivity and mobility which will directly benefit the local community. However, the DDI may cause concern due to its unfamiliarity and innovative design. - The Public Involvement Plan is included in the Partnership and Collaboration Merit Criterion.
Issues with City of Tulsa Construction and Maintenance Agreement (Low)	<ul style="list-style-type: none"> - ODOT and City of Tulsa have negotiated numerous maintenance agreements on

previous projects and have standard language and terms. See Partnership and Collaboration Merit Criterion and attached Letter of Funding Commitment.

Technical Capacity

ODOT has the technical capacity to successfully complete the US-75/W. 81st Street Interchange Project. ODOT has a close partnership with the FHWA Oklahoma Division through which it receives its Federal aid allocation and discretionary grant funding. ODOT has been awarded several discretionary grants from various programs, including BUILD, and is familiar with developing grant agreements, administering the funding, and providing the necessary reporting. 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 requirements³, and keep the public informed of the project's progress. ODOT's Contract Compliance Division ensures that ODOT and all its consultants and contractors comply with applicable Civil Rights requirements.

ODOT has extensive experience completing projects with a similar scope, having improved interchanges across the state, including DDIs in Elk City, Oklahoma (**Figure 2**) and in Tulsa.



Figure 2: Diverging Diamond at SH-6 over I-40, Elk City, OK

³ Including, but not limited to, Buy America, ADA, Civil Rights, Federal Motor Vehicle Safety Standards, and Federal Motor Carrier Safety Regulations.