

Project Readiness: Supplemental Information

Project Schedule

The project schedule below outlines the dates by which the City of Pendleton and ODOT plan to complete each aspect of the project. As shown, obligation can occur before the September 30, 2026 obligation deadline due to the advancement of significant pre-construction activities. Construction should be completed by the end of 2028. The City of Pendleton and ODOT will work to acquire all rights-of-way expeditiously once the RCN grant is awarded, capitalizing on previous work already completed as part of the [Interchange Area Management Plan](#). This will all be completed pursuant to the Uniform Relocation Act, 49 CFR part 24, 23 CFR part 710, and other applicable legal requirements.

Year	2024				2025				2026				2027				2028				2029			
Quarter	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4																
Permitting / NEPA																								
Final Design																								
ROW Acquisition																								
Procurement																								
Construction																								
Start of Operations																					★ Start of Operations			

The City of Pendleton and the State of Oregon have already committed \$1 million in funds for surveying, preliminary right of way, environmental work, and design work that is currently underway for these improvements. As a result, the design is about 75% complete, allowing for the prompt delivery of the project. Preliminary designs, probable construction methods, and cost estimates have already been completed, confirming the project is technically and financially feasible. Estimates were developed as a product of collaborative work between ODOT and the City of Pendleton as part of the [Interchange Area Management Plan in 2010](#), and most recently, refined as survey and preliminary engineering have developed with the \$1 million, design only, current ODOT STIP project. These estimates have been carefully crafted to avoid cost overruns.

Required Approvals

Environmental Permits and Reviews

National Environmental Policy Act (NEPA)

The project is located within previously developed land and no environmentally sensitive areas are within the project area, and no significant impacts will result from the construction and operation of the project. ODOT has been working closely with Federal Highway Administration’s (FHWA) environmental staff regarding the classification, and FHWA has made the preliminary

determination that the project will fall into the Categorical Exclusion (CE) classification per CFR 771.117(d)(13). See attached “[Environmental Prospectus](#).”

Reviews, Approvals, and Permits by Other Agencies

No wetlands or waterways will be directly impacted by the project and, as such, permits will not be required by the Oregon Department of State Lands or the U.S. Army Corps of Engineers. However, Endangered Species Act (ESA) consultation with the National Marine Fisheries Service will be required to address stormwater impacts. The Oregon State Historic Preservation Office must be engaged in compliance with Section 106 of the National Historic Preservation Act. Tribal consultation with the Confederated Tribes of the Umatilla Reservation is also needed.

The project has been strategically designed to meet transportation needs with input from local stakeholders and partnering municipalities (see attached support resolution from Umatilla County in “[letters of support](#)”). As such, ODOT and the City have ensured that no environmental or other public resources will be negatively affected by the completion and operation of the project.

Environmental Studies

Construction will take place only within the City’s developed and zoned land, so environmental mitigation measures are not anticipated. Additional environmental investigations will be completed to support the preliminary NEPA CE determination including, but not limited to Endangered Species Act consultation to address stormwater; National Historic Preservation Act Section 160 investigations for archaeological and built environment resources and tribal consultation; noise impact and abatement analysis; and a Hazardous Materials Corridor Assessment.

Federal Agency Collaboration

While there are no final environmental documents to provide at this point, the City of Pendleton and ODOT have coordinated with the Division Office of FHWA on this project to ensure that its implementation fully adheres to all environmental and other federal laws and regulations. FHWA assured that the project would not require an Access Modification Request (AMR) to FHWA, and appeared to be fully acceptable with all other relevant regulations. With a project prospectus now complete between ODOT and FHWA, FHWA has made the preliminary determination that the project will classify as Categorical Exclusion (CE).

Right-of-Way Acquisition Plans

This project has been designed to minimize right-of-way (ROW) acquisition and impacts on residential and business displacements, including consideration of Environmental Justice populations through EJ Screen. For the necessary acquisition, ODOT and Pendleton have coordinated with those property owners and affected individuals. Owners will be offered just compensation for the required ROW. Just Compensation includes the estimated value of all the land and improvements within the needed area. In addition, if only a part of a property is to be acquired, just compensation would also include any measurable loss in value to the remaining property due to the partial acquisition. Project planning and ROW acquisition are anticipated to be completed by mid to late 2025. See the attached “[Environmental Prospectus](#)” for more detail.

Public Engagement

ODOT and the City of Pendleton have strived to design this project with input from residents and stakeholders to ensure it meets the needs of all users of the transportation system while taking appropriate measures to avoid adverse impacts to any neighboring properties. In 2010, the City of Pendleton completed a comprehensive [Interchange Area Management Plan](#) that relied heavily on a public process to solicit input from community members. The city sought to involve the local community, so residents would be aware of potential designs and why certain designs may be preferred over others. As part of this process, the city held multiple open houses in addition to public hearings before the Planning Commission and City Council before the plan was adopted. Moreover, the attached financial commitment resolution for \$2 million in local matching funds went before Pendleton City Council in a public forum where it was unanimously approved (“[Pendleton Financial Commitment](#)”).

As stated earlier, FHWA has completed an environmental prospectus that utilized EJ Screen and found that “there is no indication that EJ populations would be adversely affected by this project.” Moreover, the prospectus stated that while EJ populations may not occur in or proximal to the project area, ODOT will ensure that all populations potentially impacted by the project will be engaged in meaningful involvement above that already completed during the development of the IAMP. As stated in the prospectus, “Outreach and engagement would focus on relaying the project’s effects to and getting input from the community about project impacts, particularly regarding mobility and access impacts during construction...to implement a robust public engagement effort.”

State and Local Approvals

The project includes broad public support demonstrated by the letters of support submitted with this application from the Oregon Transportation Commission, Oregon Freight Advisory Committee, Umatilla County, Umatilla County Chamber of Commerce, and several public and private entities in Pendleton.

Planning and design have already been included in the [Oregon STIP](#) (page 727). The project is a top priority for ODOT Region 5 (eastern Oregon), which will contribute \$2 million in project funding upon receiving federal RCN funds. The project will be quickly incorporated into the STIP with the awarding of the requested RCN grant. The City of Pendleton has adopted the [I-84/US395 Interchange Area Management Plan](#) for this interchange project. As such, this project was amended into the City’s adopted Transportation System Plan. The project is outside of the jurisdiction of Umatilla County so no action is required to incorporate the project in the County’s planning documents. Nevertheless, Umatilla County is a strong supporter of this project and a support resolution approved by the County Board has been included as part of this application (attached within “[letters of support](#)”).

Federal Transportation Requirements Affecting State and Local Planning

In recognition of the regional importance of the I-84/US 395 Southgate Interchange Improvements Project, it was included as an identified need in the most recent [Oregon Freight Plan](#), which states on page H-43 that “the U.S. 395/I-84 Interchange ramps no longer meet intersection function criteria. Traffic backs up the ramps to the freeway regularly. This affects the primary entrance to Pendleton's commercial district.” Furthermore, the project is supported by Umatilla County, as

well as the Oregon Transportation Commission and Oregon Freight Advisory Commission. No further legislative approvals are needed for completion.

The anticipated schedule of this project is fully compliant with all relevant state and local plans. ODOT and the Oregon Transportation Commission have already incorporated planning and design for this project into the [Oregon STIP](#) (page 727), and its construction will be easily added.

Assessment of Project Risks and Mitigation Strategies

Both the City of Pendleton and ODOT believe the I-84/US 395 Southgate Interchange Improvements Project is low-risk. Analysis shows little need for mitigation due to its strategic design to avoid any obstacles that would prevent prompt completion. The project is a result of extensive public engagement with preliminary design work already completed. The project has been strategically planned to avoid any issues with permitting, technical feasibility, funding, or any other risks that may create obstacles to the timely delivery of the project. The City and ODOT's analysis and planning process has not shown any serious obstacles that pose a threat to the completion of this project once RCN funds are awarded.

Risk Mitigation Table

Risk Description	Assessment	Level	Mitigation Plan
Environmental: potential for additional permitting if work is required in environmentally sensitive areas	Project is located within previously developed land and transportation corridors. Potential widening of Southgate is within proximity with Tutuilla Creek but should be avoided.	Low	Final planning and engineering will ensure the project design follows a route that does not negatively impact Tutuilla Creek and create the need for additional unnecessary permitting.
Cultural or Historic Resources: potential for increased permitting if project impacts cultural or historic resources	Project is located on previously developed land where no issues were raised previously. Project does not impact nearby cemetery owned and operated by City.	Low	Project implementation will follow designs to stay within previously disturbed ground and avoid any areas of concern.
Agency Approvals: potential for delay with complex projects involving multiple jurisdictions	Pendleton and ODOT have coordinated closely to develop this project. The project does not cross land on any additional jurisdictions.	Low	N/A
Right of Ways	Right of ways will be required. These have been previously identified in the completed IAMP.	Low	Pendleton and ODOT will have ODOT ROW negotiate real market value for ROW purposes.
Cost Overruns	ODOT has completed extensive budget analysis and projection during the application period to account for recent cost escalations. A higher than normal 24% contingency risk factor was included to safeguard against price escalations.	Low	Budget includes a contingency level to account for rising costs. Escalations beyond the budget will be addressed by project modifications or pursuing other funding sources.

The project will also be completed according to plans, specifications, and estimates, that are Build America Buy America compliant. ODOT intends to use only iron, steel, manufactured products, and construction materials that are produced in the United States. ODOT does not intend to use any product with foreign content or of foreign origin, nor do we anticipate any potential foreign-content issues with our proposed project.

Technical Capacity

Both ODOT and the City of Pendleton have proven themselves responsible stewards of federal funding. This project will be administered by ODOT, which has successfully delivered countless federal aid projects of similar scope and scale, including those using RAISE/BUILD/TIGER grant funding. As previously described, ODOT and Pendleton have coordinated closely throughout the development and planning of this project. Attached to this application is a letter of commitment from ODOT, which is the facility owner for much of the project area (“[ODOT Commitment](#)”).