

Appendix F: Agency and Tribal Coordination Letters



AGENCY COORDINATION PLAN

Kansas City South Loop Project

January 23, 2024

Introduction

To comply with the National Environmental Policy Act (NEPA) requirements and the Council on Environmental Quality (CEQ) regulations (40 CFR 1500 et seq.), the Port Authority of Kansas City (Port KC), the Downtown Council of Kansas City (DTC), and the City of Kansas City, Missouri (KCMO), in coordination with the Missouri Department of Transportation (MoDOT) and the Federal Highway Administration (FHWA), have initiated an Environmental Assessment (EA) to construct a structural deck over a four-block portion of Interstate 670 (I-670) in Downtown Kansas City, Missouri. This coordination plan has been developed to establish the anticipated schedule, process, and planned coordination and key milestones for agency participation for the project.

Project Background

The South Loop Project is located in Kansas City, Missouri, between the southern edge of the CBD and the northern edge of the Crossroads Arts District. The project location and boundaries, shown in Figure 1 and Figure 2, are the westbound and eastbound traffic lanes of Truman Road (15th Street) on the north and south, respectively, Broadway Boulevard to the west and Grand Boulevard to the east. The project area is a rough rectangle approximately 2,300 feet in length (from east to west) and 260 feet wide (north to south), although the project area width varies due to the variable configuration and location of Truman Road and its right-of-way. I-670 within the project area is constructed below-grade, approximately 20 feet below Truman Road, although the depth of I-670 below grade varies throughout the corridor. I-670 connects with I-35 in the southwestern portion of the downtown loop and connects with I-70 and U.S. 71 in the southeast portion of the downtown loop. Truman Road functions as an urban arterial allowing freeway and local traffic to access downtown. Bridging the interstate in the project area are (in the order of west to east) Broadway Boulevard, Central Street, Wyandotte Street, Baltimore Avenue, Main Street, Walnut Street, and Grand Boulevard.

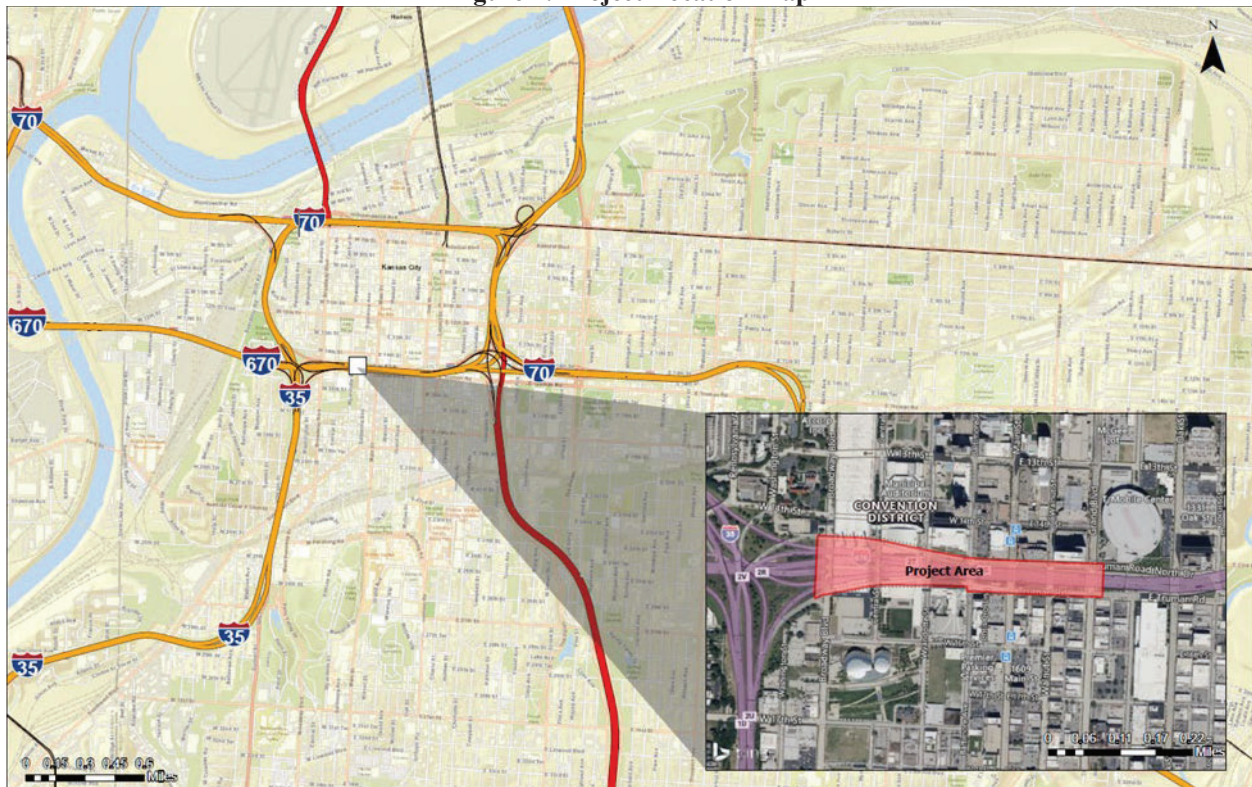
Port KC, in coordination with KCMO and the DTC, are project sponsors and are providing planning, conceptual design, and public engagement and outreach activities for the South Loop Project. The NEPA and conceptual design planning stages of the project are being coordinated with the FHWA and MoDOT to meet all applicable NEPA processes and state and federal technical design requirements related to interstate highways.

FHWA has determined that the NEPA class of action for this project is an EA. An EA is a document that is required by NEPA for certain federal actions. Under NEPA, an EA is required to determine whether a federal action has the potential to cause significant environmental effects. If the FHWA determines that the proposed action will not have a significant environmental impact, a Finding of No Significant Impact (FONSI) will be issued. If the EA determines that the environmental impacts of a proposed federal action will have significant impacts, an Environmental Impact Statement (EIS) must then be prepared. The EA and the NEPA process for the South Loop Project was initiated on March 1, 2023.

Environmental analyses and NEPA documentation for environmental topics and resources will be prepared to gain required MoDOT and FHWA environmental approvals to proceed with further project development. Preparation of the NEPA environmental analyses will be based on meeting current

MoDOT, CEQ, U.S. Environmental Protection Agency (USEPA), NEPA, and USDOT/FHWA requirements.

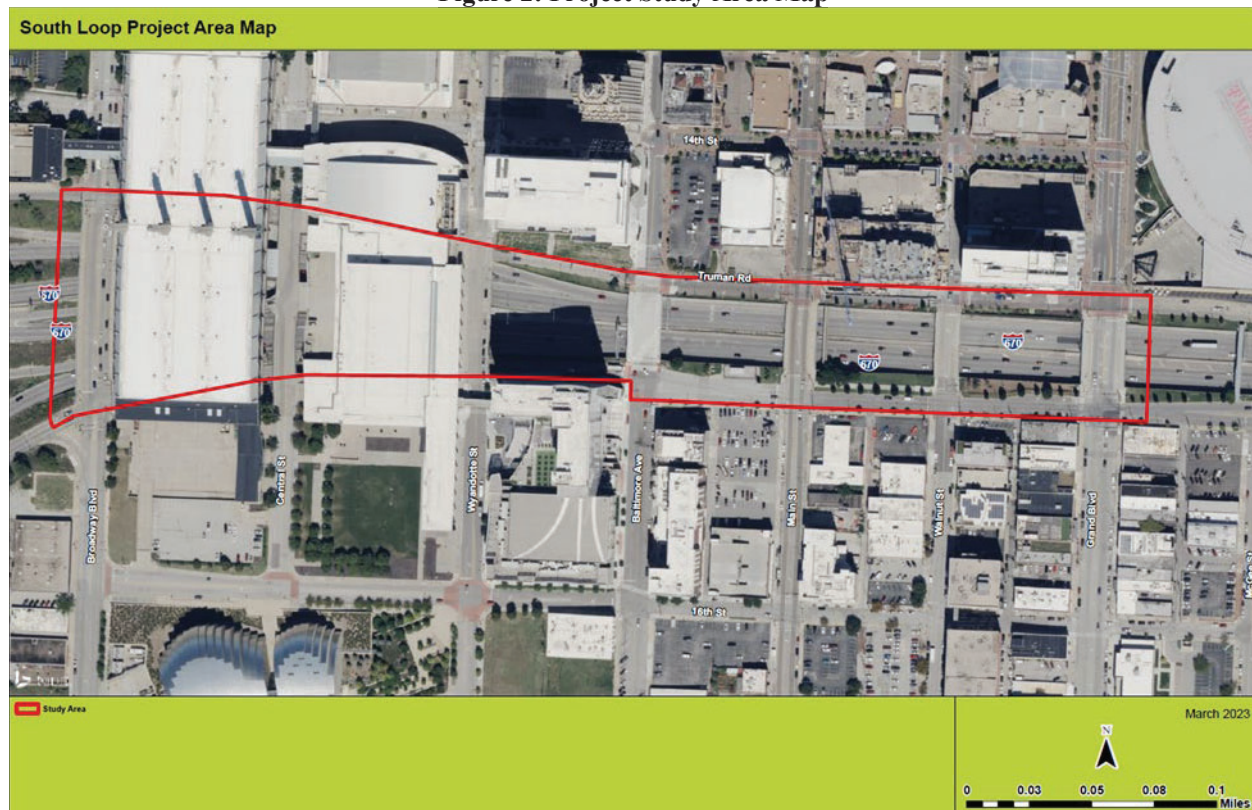
Figure 1: Project Location Map



The general purpose of the project is to address several community-specific transportation-related challenges created when this segment of I-670 was constructed in the late 1960's. To address these transportation issues, proposed improvements are expected to:

- **Repair the physical separation of economic, cultural, and residential districts that occurred when I-670 was constructed.** The construction of the below-grade I-670 physically separated the CBD and the adjacent Crossroads Arts District. Proposed improvements should reconnect those districts.
- **Enhance multimodal connections for residents of adjacent neighborhoods and broader community.** The current design of I-670 and the connecting surrounding transportation infrastructure in the project area prioritizes vehicles over any other mode of transportation. Proposed improvements should enhance existing and create new multimodal connections.

Figure 2: Project Study Area Map



Initial Agency Coordination

Notice of Intent

There will not be a Notice of Intent (NOI) published in the Federal Register for this NEPA EA project. Should FHWA determine an EIS is required to continue with project development activities, an NOI will be filed in the Federal Register at that time.

Initial Coordination Package

Port KC, DTC, KCMO will prepare an initial coordination packet for distribution to local, state, and federal agencies, tribes, officials, and organizations identified in **Table 1**. This packet will be sent to agencies in May 2023. This packet will include a letter inviting the agency to coordinate on the EA, a project description detailing the project and its process, a project study area map, the draft Purpose and Need Statement, and a copy of this Agency Coordination Plan.

The initial coordination packet is meant to fulfill the scoping activities point of collaboration. **Appendix C** will contain copies of response letters received from the agencies during the initial coordination process.



Lead, Cooperating, and Participating Agencies

Port KC, with support from DTC and KCMO will be the lead local agency for the NEPA EA. MoDOT will serve as the lead state agency and the FHWA will serve as the lead federal agency. For this project, all agencies will be considered participating agencies. Should the FHWA determine an EIS is required for this project, invitations for cooperating and participating agencies will be revisited at that time.

The NEPA evaluation process, environmental review, consultation, and other actions as required by Federal law for this project will be carried out by the project partners in coordination with MoDOT and FHWA. Those actions include:

- Identifying agencies to participate in the environmental review process;
- Developing an Agency Coordination Plan;
- Developing a Public Involvement Plan;
- Providing the public and agencies opportunities to provide input on alternatives and findings of the evaluation process;
- Preparing and approving NEPA evaluation documentation; and
- Providing the public and agencies opportunities to review and provide input on the NEPA evaluation documentation and findings.

Table 1: List of Lead and Participating Agencies

Agency	Role	Response Received	Responsibility
Port Authority of Kansas City, Missouri (Port KC)	Local Lead Agency	NA	Prepare EA evaluation; provide opportunities for public and agency involvement.
Downtown Council of Kansas City, Missouri (DTC)	Local Lead Agency	NA	Prepare EA evaluation; provide opportunities for public and agency involvement.
City of Kansas City, Missouri (KCMO)	Local Lead Agency	NA	Prepare EA evaluation; provide opportunities for public and agency involvement.
Missouri Dept. of Transportation (MoDOT)	State Lead Agency	NA	Manage environmental review process; review and approve EA.
Federal Highway Administration (FHWA)	Federal Lead Agency	NA	Manage environmental review process; review and approve EA.
U.S. Army Corp of Engineers (USACE), Kansas City District	Participating Agency		Consultation
U.S. Fish and Wildlife Service (USFWS)	Participating Agency		Consultation
U.S. Environmental Protection Agency (USEPA)	Participating Agency		Consultation

Agency	Role	Response Received	Responsibility
U.S. Department of Agriculture (USDA)	Participating Agency		Consultation
Federal Emergency Management Agency (FEMA)	Participating Agency		Consultation
U.S. Department of the Interior, National Park Service, Midwest Region (NPS)	Participating Agency		Consultation
Federal Transit Administration (FTA), Region 7	Participating Agency		Consultation
Missouri Department of Natural Resources (MDNR)	Participating Agency		Consultation
Missouri Department of Natural Resources (MDNR) - SHPO	Participating Agency		Consultation
State Emergency Management Agency Missouri (SEMA)	Participating Agency		Consultation
Missouri Department of Conservation (MDC)	Participating Agency		Consultation
Iowa Tribe of Kansas and Nebraska	Participating Agency		Consultation
Iowa Tribe of Oklahoma	Participating Agency		Consultation
Kaw Indian Tribe of Oklahoma	Participating Agency		Consultation
Miami Tribe of Oklahoma	Participating Agency		Consultation
Osage Nation	Participating Agency		Consultation
Ponca Tribe of Nebraska	Participating Agency		Consultation
Ponca Tribe of Oklahoma	Participating Agency		Consultation
Sac and Fox Tribe of the Missouri in Kansas and Nebraska	Participating Agency		Consultation
Sac and Fox Tribe of the Mississippi in Iowa	Participating Agency		Consultation
Sac and Fox Nation of Oklahoma	Participating Agency		Consultation
Shawnee Nation	Participating Agency		Consultation
Wyandotte Nation	Participating Agency		Consultation
Economic Development Corporation of Kansas City (EDCKC)	Participating Agency		Consultation
Kansas City Chamber of Commerce (KC Chamber)	Participating Agency		Consultation
City of Kansas City Planning and Development Department	Participating Agency		Consultation
City of Kansas City Public Works Department	Participating Agency		Consultation
Crossroads Community Association of Kansas City	Participating Agency		Consultation
Kansas City Downtown Neighborhood Association	Participating Agency		Consultation
Kansas City Streetcar Authority	Participating Agency		Consultation



Agency	Role	Response Received	Responsibility
Mid-America Regional Council (MARC)	Participating Agency		Consultation
Kansas City Area Transportation Authority (KCATA)	Participating Agency		Consultation
Downtown Kansas City Community Improvement District	Participating Agency		Consultation
Jackson County, Missouri	Participating Agency		Consultation

Agency Coordination Points

Lead agencies (Port KC, DTC, KCMO, MoDOT, and FHWA) for the EA evaluation must agree that the project may move forward at key points including:

- Project initiation, scoping activities, and purpose and need;
- Identification of alternative(s);
- Results of the EA evaluation; and
- Completion of permits, licenses, or approvals (post NEPA).

Agencies may be asked to review deliverables and provide feedback at these collaboration points. The study team will address comments received from participating agencies before finalizing documents for official approval.

The lead agencies will ensure information is presented to participating agencies at key points throughout the project through coordination. An agreed upon amount of time will be provided for agencies to review and submit feedback; this will typically be 30 days from receipt of the materials. Key coordination points for this project and anticipated dates for coordination are shown in **Table 2**. Table 2 will be updated as new information becomes available.

Table 2: Agency Coordination Schedule & Tracking

Anticipated Time Frame	Coordination Topic	Completion Date
May 2023	Project Initiation, scoping, and purpose and need	May 2023
October 2023	Identification of alternatives	October 2023
June 2024	Results of the EA evaluation	
TBD - Post NEPA	Completion of permits, licenses, and approvals	

Project Schedule

The following key milestones are anticipated for this project:

- Green space design concepts – April 11, 2023
- Screening of alternatives– April 11-25, 2023
- Preferred design alternative – May 30, 2023
- Cultural Resources Documentation – June 20, 2023
- Noise and Air Studies – June 23, 2023



- Fire, Life, Safety, and Hazardous Materials Studies – May 9, 2023
- Draft NEPA Environmental Assessment Documentation – June 29, 2023
- Conceptual design & plans – June 29, 2023

Agency Coordination Plan Revision History

The following Revision Log will be used to identify changes and updates to the Agency Coordination Plan.

Version	Date	Document Name	Revision Description and why it is needed.
1	3/20/2023	Draft Agency Coordination Plan	Original review draft
2	5/10/2023	Updated Agency Coordination Plan	Updates to draft document
3	1/23/2024	Agency Coordination Plan	Updated dates in document

Michael Meyer

From: Peters, Taylor (FHWA) <taylor.peters@dot.gov>
Sent: Friday, April 14, 2023 1:09 PM
To: lfoster@iowas.org; akelley@iowas.org; CPershall@iowanation.org; srichardson@kawnation.com; THPO@MiamiNation.com; ssettje@poncatribe-ne.org; liana.hesler@ponca-nsn.gov; lisa.montgomery@sacfoxenviro.org; director.historic@meskwaki-nsn.gov; Carol.Butler@sacandfoxnation-nsn.gov; tonya@shawnee-tribe.com; sclemons@wyandottenation.org
Cc: Michael Meinkoth; Michael Meyer
Subject: FHWA-MoDOT S106 Undertaking and NEPA EA Development Notification, Jackson County, Route I-670
Attachments: KC South Loop Project Description.pdf; KC_South_Loop_study_area.kmz
Follow Up Flag: Follow up
Flag Status: Flagged

To Whom it May Concern:

To comply with the National Environmental Policy Act (NEPA) requirements and the Council on Environmental Quality (CEQ) regulations (40 CFR 1500 et seq.), the Port Authority of Kansas City (Port KC), the Downtown Council of Kansas City (DTC), and the City of Kansas City, Missouri (KCMO), in coordination with the Missouri Department of Transportation (MoDOT) and the Federal Highway Administration (FHWA), has initiated an Environmental Assessment (EA) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP). The attached Project Description should help you understand the nature of the project and the location of the proposed improvements.

Port KC, in coordination with the DTC, and KCMO are project sponsors and are providing planning, conceptual design, and public engagement and outreach activities for the proposed project. The NEPA and conceptual design planning stages of the project are being coordinated with FHWA and MoDOT to meet all applicable NEPA process and state and federal technical design requirements related to Interstate highways.

The proposed project will create a 5.5-acre site on the south side of Kansas City's Central Business District (CBD) on top of a below-grade portion of the I-670 freeway. The newly created space will transform the area into a multimodal connector and destination that spurs adjacent investment while also addressing community challenges created when I-670 was implemented over five decades ago.

As part of the NEPA coordination process and the Section 106 of the National Historic Preservation Act consultation process, we are notifying the tribal nations who have requested to consult on Section 106 undertakings in Jackson County regarding the proposed project. We are inviting the interested tribal nations to participate in the development of the NEPA EA and requesting information regarding any known or potential cultural resources that may be of historical or religious significance to your tribal nation in the project area. Comments and materials provided by the tribal nations will be incorporated into the environmental planning process and ultimately the EA document as appropriate; any locational information regarding cultural resources will be kept confidential.

If you have any comments or requests for additional information concerning this project, please contact Mike Meinkoth and Michael Meyer (with the MoDOT Historic Preservation Section who are included on this email) and copy me.

Sincerely,

Taylor Peters
Environmental Protection Specialist
Missouri Division Office
Federal Highway Administration
3220 W. Edgewood, Suite H
Jefferson City, Missouri 65109
573-638-2621



Michael L. Parson
Governor

State of Missouri
OFFICE OF ADMINISTRATION
Post Office Box 809
Jefferson City, Missouri 65102
Phone: (573) 751-1851
Fax: (573) 751-1212

Kenneth J. Zellers
Commissioner

May 30, 2023

Brian Rabineau
Berkley Pkwy
Kansas City, MO 64120

Subject: 2311041
Legal Name: Port Authority of Kansas City
Project Description: Kansas City South Loop Project NEPA
Environmental Assessment (EA), Kansas City, Jackson County,
Missouri

The Missouri Federal Assistance Clearinghouse, in cooperation with state and local agencies interested or possibly affected, has completed the review on the above project application.

None of the agencies involved in the review had comments or recommendations to offer at this time. This concludes the Clearinghouse's review.

A copy of this letter is to be attached to the application as evidence of compliance with the State Clearinghouse requirements.

Sincerely,

A handwritten signature in cursive script that reads "Sara VanderFeltz".

Sara VanderFeltz
Administrative Assistant

cc:

Subject: RE: EPA Comments - Kansas City South Loop Project

From: "Sedlacek, Michael" <Sedlacek.Michael@epa.gov>
Date: June 5, 2023 at 9:50:49 AM CDT
To: Brian Rabineau <brabineau@portkc.com>
Cc: kevin.ward@dot.gov, jill.bruss@modot.mo.gov
Subject: EPA Comments - Kansas City South Loop Project

Dear Mr. Rabineau:

The U.S. Environmental Protection Agency Region 7 has reviewed the project scoping document for the Kansas City South Loop Project. The Federal Highway Administration (FHWA), the Missouri Department of Transportation (MoDOT), and the Port Authority of Kansas City propose to construct a structural deck over a four-block portion of Interstate 670 in downtown Kansas City, Missouri. The following comments were prepared in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

Water Quality

The forthcoming NEPA document should describe how the proposed action may affect water bodies listed as impaired under Section 303(d) of the Clean Water Act and their listing status as impaired. We recommend this section of the document discuss current impairments, and how the proposed actions may affect, either positively or detrimentally, any impairments. NEPAassist (<https://www.epa.gov/nepa/nepassist>) may be used to identify nearby impaired waterbodies and other environmental and human health concerns.

Air Quality Strategies

Temporary fugitive dust and diesel exhaust emissions from construction activities, such as use of heavy machinery and material hauling, would occur. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Diesel exhaust can also lead to other serious health conditions and can worsen heart and lung disease. We recommend implementing air quality best management practices and mitigation measures for this project. Examples include:

- Use vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available.
- Establish an anti-idling policy for internal combustion vehicle.
- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.

Where appropriate, retrofit older-tier or Tier 0 nonroad engines with an exhaust filtration device before it enters the construction site to capture diesel particulate matter.

Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate.

Where appropriate, install wind fencing.

Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce operator exposure to diesel exhaust.

Climate Change Resiliency

The National Climate Assessment (<https://nca2018.globalchange.gov/>) finds that in the Midwest, extreme heat, heavy downpours, and flooding will affect infrastructure, health, air, and water quality, and more. Major storm events are occurring with increasing frequency and intensity. The forthcoming NEPA document should account for increased storm frequency and intensity in the design of any proposed mitigation to help ensure the health and safety of the public by installing stormwater management features, such as stormwater retention/detention basins, permeable pavement, rain gardens, and rainwater cisterns. See EPA's Adaptation Resource Center at <https://www.epa.gov/arc-x/planning-climate-change-adaptation> for information on climate change resiliency and adaptation measures.

Environmental Justice and Children's Health

EPA recommends that any affected communities living with environmental justice concerns be identified and given an opportunity to provide input into the remainder of the NEPA process, including proposed mitigation. The future NEPA document should include information describing what was or will be done to inform these communities about the project and the potential impacts it will have on their communities, what input has been received to date from the communities, and how that input was or will be used in decision-making. EPA encourages using EJScreen (<https://www.epa.gov/ejscreen>) as the first step to identify communities living with environmental justice concerns within and near the project area.

Energy Efficiency

Where applicable, EPA encourages the use of energy-efficient and/or sustainable building materials. We also recommend installation of renewable energy sources, such as solar panels. Section 438 of the Energy Independence and Security Act provides examples of how to integrate energy efficiency into Federal projects.

Pollinators and Native Plant Species

Pollinators are critical contributors to our nation's economy, food system, and environmental health. Vegetation within the project area can provide vital habitat for pollinators, providing food, shelter, and connections to other patches of habitat. Where feasible, we recommend planting native species and pollinator-friendly plants within the project footprint.

Consultation Records

EPA recommends attaching to the forthcoming NEPA document inter-agency consultation documents regarding historic resources (Missouri State Historic Preservation Office), wetlands and streams (U.S. Army Corps of Engineers), and Federal and state threatened and endangered species (U.S. Fish and Wildlife Service and Missouri Department of Natural Resources).

We appreciate your consideration of our recommendations. These comments are intended to help ensure a thorough assessment of the project's environmental impacts, adequate public disclosure, and an informed decision-making process. If you have any questions concerning our review, please contact Mike Sedlacek at (913) 551-7208 or sedlacek.michael@epa.gov.

Sincerely,

Mike Sedlacek
Environmental Scientist
Office of Intergovernmental Affairs
US Environmental Protection Agency, Region 7
11201 Renner Boulevard

Lenexa, Kansas 66219
(913) 551-7208
Sedlacek.michael@epa.gov

June 21, 2023

Ms. Toni Prawl
State Historic Preservation Officer
Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102



RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri

Dear Name:

To comply with the National Environmental Policy Act (NEPA) requirements and the Council on Environmental Quality (CEQ) regulations (40 CFR 1500 et seq.), the Port Authority of Kansas City (Port KC), the Downtown Council of Kansas City (DTC), and the City of Kansas City, Missouri (KCMO), in coordination with the Missouri Department of Transportation (MoDOT) and the Federal Highway Administration (FHWA), have initiated an Environmental Assessment (EA) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

Port KC, in coordination with the DTC, and KCMO, are project sponsors and are providing planning, conceptual design, and public engagement and outreach activities for the proposed project. The NEPA and conceptual design planning stages of the project are being coordinated with the FHWA and MoDOT to meet all applicable NEPA processes and state and federal technical design requirements related to Interstate highways.

The proposed project will create a 5.5-acre site on the south side of Kansas City's Central Business District (CBD) on top of a below-grade portion of the I-670 freeway. The newly created space will transform the area into a multimodal connector and destination that spurs adjacent investment while also addressing community challenges created when I-670 was implemented over five decades ago.

The enclosed draft Purpose and Need statement for the project provides details related to the need for the project. Please review the draft Purpose and Need statement and provide any comments you and your agency may have regarding the Purpose and Need. The first public information meeting (PIM) for the project was held March 7, 2023. The draft Purpose and Need was available to the public for review and comment during the PIM. No comments specifically related to the Purpose and Need were received.

FHWA has determined that the NEPA class of action for this project is an Environmental Assessment. Under NEPA, an EA is required to determine whether a federal action has the potential to cause significant environmental effects. If FHWA determines that the proposed action will not have a significant environmental impact, a Finding of No Significant Impact (FONSI) will be issued. If the EA determines that the environmental impacts of a proposed Federal action will have significant impacts, an Environmental Impact Statement (EIS) must then be prepared. The EA and formal NEPA process for the South Loop Project was initiated on March 1, 2023.

As part of the early coordination process for this EA, we are soliciting comments from your Agency regarding the proposed project as it relates to your Agency's area of expertise. Comments and materials you supply will be used to determine if the proposed improvements may have impacts that warrant further

consideration within the study area. Your comments will be incorporated into the environmental planning process and ultimately the EA document as appropriate.

The enclosed Agency Coordination Plan and Project Description should help you understand the nature of the project and help you determine the location of the proposed improvements. Please provide any comments you may have regarding these documents as well.

To remain on schedule, it is requested that your response and comments be sent to our office within 30 days of receipt of this letter. If you have any questions about the proposed project, please contact me at (816) 559-3750 or by email at brabineau@portkc.com.

Sincerely,

DocuSigned by:

F57667212EAA421...

Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Agency Coordination Plan
Project Description
Purpose and Need Statement



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Michael L. Parson
Governor

Dru Buntin
Director

June 26, 2023

Brian Rabineau
General Counsel
Port Authority of Kansas City
brabineau@portkc.com

Dear Brian;

The Missouri Department of Natural Resources appreciates the opportunity to review the materials for the South Loop Project. The Department offers the following general comments for consideration.

Project Location

The project is located in Kansas City between the southern edge of the CBD and the northern edge of the Crossroad Arts District. The project spans I-670. The boundaries are 50-feet west of Broadway Boulevard, 50-feet east of Grand Boulevard, and the westbound and eastbound traffic lanes of Truman Road (15th Street) for the north and south boundaries. The following geographic descriptions apply to the approximate location of the study area.

Geographic Coordinates:

363144 E, 4328618 N

Public Land Survey System:

T49N R33W S05

8-Digit Hydrologic Unit Code:

Lower Kansas, Kansas (10270104)

Ecological Drainage Unit:

Central Plains/Kansas

Geology and Geospatial Data

Local bore holes within one mile of the site indicate the subsurface is 30-35 feet of loess/alluvium on top of Pennsylvanian-age Kansas City Group bedrock. Due to limited documented bore holes within or near the project area, it is recommended that a more detailed investigation be performed should site-specific subsurface geologic information be needed.

This region of Missouri is not considered to have karst topography and typically is not prone to karst collapse. There is limited seismic activity regionally, however should a seismic event occur there is

sufficient bedrock at shallow depth to reduce the risk of liquefaction within the project area. There are no documented subsurface historic mine sites within close proximity to this section of I-35 and I-670.

The Missouri Geological Survey can be contacted directly at 800-361-4827. Other maps showing natural and cultural resources can be found at <https://dnr.mo.gov/land-geology/maps-data-research>.

Karst Topography

There are no springs or sinkholes near the project area. The project area is located in the "Kansas City" quadrangle, which has a cave density of 3. Springs, sinkholes, and caves are features on the landscape associated with karst topography that can act as direct conduits of surface water and pollutants to groundwater. As such, extra precaution should be taken to minimize disturbance of land in or around these features, and to avoid the introduction of pollutants to sensitive groundwater resources. Karst areas may also present the possibility of potential collapse.

Wells

There are 663 abandoned, soil, and other public wells near the project area. Wells can act as conduits of pollutants to groundwater resources. Abandoned wells should be plugged prior to any land disturbance, and care should be taken to utilize appropriate best management practices to protect any currently operating wells. For more information on locating and plugging wells, or on private domestic wells, please visit the link below for the Department's Wellhead Protection Section webpage or contact the Department's Geological Survey Program directly.
<https://dnr.mo.gov/water/business-industry-other-entities/permits-certification-engineering-fees/wells-drilling>.

Public Land:

There are no public lands located near the project area.

Conservation Opportunity Areas

There are no Conservation Opportunity Areas (COA's) near the project area. Both terrestrial and aquatic COAs are identified by the Missouri Department of Conservation (MDC) and its conservation partners as priority areas that support and conserve viable populations of wildlife and the ecological systems on which they depend. Designated COAs are located statewide and may consist of a combination of public and private resources. Please contact the MDC at 573-751-4115 for more information.

Water Protection

Best Management Practices

Best management practices should be utilized during project activities to limit the amount of sediment and other pollutants entering waters of the state, and to protect the water's chemical, physical, and biological characteristics. These practices include, but are not limited to, conducting work during low flow conditions whenever possible, keeping heavy equipment out of the water, and taking all necessary precautions to avoid the release of fuel or other waste products to streams and other waters. In addition, the Department encourages the preservation of existing riparian or buffer areas around each water resource to limit the amount of sediments or

other pollutants entering the water. Any stream banks, riparian corridors, lake shores, or wetlands denuded of vegetation should be stabilized and re-vegetated as soon as is practicable.

Watershed Conditions

Public Drinking Water

The project area is in or around the Kansas City Public Water System. There are 3 intakes, drinking water wells, or tanks near the project area. Proposed project personnel should be aware of nearby Public Drinking Water Districts. Work associated with any project should take into consideration the protection of surface and groundwater public drinking water supplies, implementing appropriate best management practices as necessary. For additional information regarding source water protection, please contact Ken Tomlin of the Department's Public Drinking Water Branch at 573-526-0269.

Designated Uses

Water Bodies with Specific Designated Uses

The proposed project area is located in the watershed of the Missouri River. Water bodies are assigned specific designated uses according to State of Missouri Water Quality regulations at 10 CSR 20-7.031(2). These waters are protected by numeric water quality criteria outlined in 10 CSR 20-7.031(5) and Table A, as well as general water quality criteria outlined at 10 CSR 20-7.031(4). Designated uses of the Missouri River include the following:

- Protection and propagation of fish, shellfish and wildlife – warm water habitat (WWH)
- Human health protection (HHP)
- Irrigation (IRR)
- Livestock and wildlife protection (LWP)
- Secondary contact recreation (SCR)
- Whole body contact recreation – Category B (WBC-B)
- Drinking water supply (DWS)
- Industrial water supply (IND)

Water Bodies without Specific Designated Uses

Water bodies that are not assigned specific designated uses are still protected by general water quality criteria outlined at 10 CSR 20-7.031(4), and are subject to the acute toxicity criteria of Tables A and B, as well as whole effluent toxicity conditions.

According to the National Wetlands Inventory <https://www.fws.gov/wetlands/>, there is the likelihood of freshwater wetlands and ponds within the riparian corridors of the Missouri River. This project has the potential to impact wetlands, ponds, and the aforementioned tributaries and headwater streams to be impacted, depending on their proximity to land disturbance activities. Project sponsors should avoid such impacts through alternatives analysis before compensatory mitigation is considered. If wetlands, ponds, headwaters, or tributaries are not directly impacted but are near any land disturbance, project sponsors should take care to protect water quality. While these water bodies are not assigned specific designated uses, they are protected by Missouri's general water quality criteria.

Sensitive Waters

There are no known sensitive waters in the project area for the following categories: Cold Water Habitat, Outstanding National Resource Waters, Outstanding State Resource Waters, biocriteria reference locations, and losing streams.

Table F, Metropolitan No-Discharge Streams

The Blue River near the project area is a metropolitan no-discharge stream. Project personnel should maintain compliance with 10 CSR 20-7.031(7) for any land disturbance activities that are within a Metropolitan No-Discharge stream's watershed. Discharge to metropolitan no-discharge streams is prohibited, except as specifically permitted at 10 CSR 20-7.031(7). These exceptions include uncontaminated cooling water, permitted stormwater discharges in compliance with permit conditions, and excess wet-weather bypasses not interfering with designated uses.

303(d) Impaired and 305(b) Threatened Waters

The Missouri River is an impaired 303(d) stream for *E. coli*. Waters assessed by the Department as threatened or impaired could potentially be impacted by projects. Project personnel should ensure that activities related to the project do not cause an increase in the pollutants impairing these waters nor re-suspend any pollutants that might be bound to sediment. Additional information can be found by contacting the Department's Water Protection Program at 573-526-1446 or by visiting the link below.

<https://dnr.mo.gov/water/what-were-doing/water-planning/quality-standards-impaired-waters-total-maximum-daily-loads/impaired-waters>

Waters with Approved Total Maximum Daily Loads

The Missouri River has a TMDL for Chlordane and PCBs. The Blue River also has a TMDL for chlordane. Impairments should not be made worse by this project's activities. The Department staff may require extra protections when developing permits or certifications in order to comply with total maximum daily load and wasteload allocations. Additional information can be found by contacting the Department's Water Protection Program at 573-526-1446 or by visiting the link below.

<https://dnr.mo.gov/water/what-were-doing/water-planning/quality-standards-impaired-waters-total-maximum-daily-loads/tmdls>

Permitting Obligations

Clean Water Act Sections 401 and 404

A Clean Water Act Section 404 Permit Authorization from the U.S. Army Corps of Engineers (USACE), and Section 401 Water Quality Certification from the Department may be required for projects that have the potential to discharge fill or dredged material into a jurisdictional water of the United States. More information about these permits can be found at the following links.

<https://www.epa.gov/cwa-404/section-404-permit-program>

<https://dnr.mo.gov/water/business-industry-other-entities/permits-certification-engineering-fees/section-401-water-quality>

If discharge into water has occurred, or will occur, project personnel should immediately contact the appropriate USACE District (link below) and the Department's Operating Permits Section at 573-522-4502 for more information.

<http://www.mvr.usace.army.mil/Portals/48/docs/regulatory/MORegBound.pdf>

Mitigation

An alternatives analysis would need to be submitted prior to any impacts to jurisdictional waters as part of the avoidance and minimization measures that precede mitigating unavoidable impacts. Mitigation for wetlands should be in conformance with the *Missouri Wetland Mitigation Method*, http://www.nwk.usace.army.mil/Portals/29/docs/regulatory/mitigation/2017-11-17_MWMM.pdf while mitigation for streams should be in conformance with *Missouri Stream Mitigation Method*, http://www.mvm.usace.army.mil/Portals/51/docs/regulatory/May_2013_Missouri_Stream_Mitigation_Method.pdf.

Any mitigation plans must be in conformance with the *Compensatory Mitigation for Losses of Aquatic Resources*, <https://www.epa.gov/cwa-404/compensatory-mitigation>.

This rule establishes a hierarchy for mitigation, with the purchase of credits from a mitigation bank at the top of that hierarchy. The rule also emphasizes in-kind and in-watershed mitigation; to go outside the watershed may result in a higher credit purchase calculation. The applicant should receive mitigation plan approval from the Department prior to certification.

Land Disturbance

Acquisition of a Section 401 Certification should not be interpreted to mean that the requirements for other permits are replaced or superseded, including Clean Water Act Section 402 National Pollutant Discharge Elimination System Permits. Work disturbing an area of one acre or more requires issuance of a land disturbance permit prior to any earth work. Disturbance to valuable resource waters, including springs, sinkholes and losing streams, could require additional conditions or a site-specific permit.

Information and application for online land disturbance permits are located at <https://dnr.mo.gov/water/business-industry-other-entities/permits-certification-engineering-fees/stormwater/construction-land-disturbance>.

Questions regarding permit requirements may be directed to the appropriate Department Regional Office <https://dnr.mo.gov/about-us/division-environmental-quality/regional-office>.

Demolition and Construction Waste Management

Additional information on managing construction and demolition waste can be found at the following link <https://dnr.mo.gov/print/document-search/pub2045>.

Hazardous Waste

Additional information on hazardous waste and petroleum tanks can be found at <https://dnr.mo.gov/waste-recycling/long-term-stewardship-lts/environmental-site-tracking-research-tool-e-start>.

During the project, if any underground tanks or contaminated soil is discovered, workers should withdraw to a safe distance and notify the Department's spill line at 573-634-2436.

It is the generator's responsibility to determine if materials generated during construction and demolition are hazardous wastes. Demolition-related waste categories typically include: paint residue (paint chips, paint scrapings, etc.); demolition debris (metal and boards that have been painted with lead-based or other heavy metal-based paint); and scrap metal (metal objects that contain lead or other heavy metals). A hazardous waste determination is not required for materials that will be reused or recycled without additional processing.

Asbestos

Prior to demolition activities, regulated structures must be thoroughly inspected by a Missouri-certified asbestos inspector to determine if any Asbestos Containing Materials are present and a notification made to the Department at least 10 working days prior to demolition. Regulated structures include any building which has been used as a commercial, institutional or industrial building (even if it was historic use), and projects involving two or more residential structures. In addition, this includes but is not limited to the following "non-building" structures: bridges, pipelines, cooling towers, chimneys, dams, and tunnels. Any asbestos found must be properly managed to prevent release of asbestos fibers.

Solid Waste

Information about solid waste uncovered during construction activities can be found at the following link.

<https://dnr.mo.gov/document-search/managing-solid-waste-encountered-during-excavation-activities-pub2192/pub2192>.

No waste may be buried on-site or at an alternate site, except for clean fill. Clean fill is defined by the Revised Statutes of Missouri as "uncontaminated soil, rock, sand, gravel, concrete, asphaltic concrete, cinder blocks, brick, minimal amounts of wood and metal and inert (non-reactive) solids...for fill, reclamation or other beneficial use." Clean fill must not contain protruding metals or demolition debris. Although not regulated as waste, placement of clean fill materials may be subject to requirements of the Department's Water Protection Program if it is placed in contact with surface or subsurface waters of the state, or would otherwise violate water quality standards.

Air Pollution

Dust

Ensure fugitive particulate matter emissions, such as dust, resulting from the project do not remain on surfaces or in the air beyond the property line of origin. 10 CSR 10-6.170 restricts the emission of particulate matter to the ambient air beyond the premises of origin. Additional information on general dust emissions may be found here <https://dnr.mo.gov/print/document-search/pub2200>.

Open Burning

The open burning of refuse and trade waste is restricted according to 10 CSR 10-6.045. Construction, demolition, and trade waste cannot be open burned, except for untreated wood. Brush from land clearing activities may be burned if the burning is conducted outside the city limits and greater than 200 yards from the nearest occupied structure. Additional information on open burning can be found at <https://dnr.mo.gov/print/document-search/pub2047>.

Historic Preservation

Project personnel should check with the Department's State Historic Preservation Office to determine if a Section 106 Review is needed. Information on the Section 106 Review can be found on the Department's website at <https://mostateparks.com/page/84371/state-historic-preservation-office>.

Additional Considerations

Floodplain

For information concerning flood plains in Missouri, contact the Missouri State Emergency Management Agency, Floodplain Management and Mitigation Branch, at 573-526-9100 or 2302 Militia Drive, Jefferson City, MO 65101.

Endangered Species

The MDC is responsible for collecting and managing information on the location and status of endangered species in the state. Contact MDC's Endangered Species Coordinator at 573-751-4115 or P.O. Box 180, Jefferson City, MO 65102 for general information.

We appreciate the opportunity to provide comments for the proposed project. If you have any questions or need clarification, please contact me at 573-522-6221. Thank you.

Sincerely,

A handwritten signature in dark ink that reads "Hannah Humphrey". The script is cursive and fluid, with the first name "Hannah" and last name "Humphrey" clearly distinguishable.

Hannah Humphrey
Deputy Director

HH/man



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Missouri Ecological Services Field Office
101 Park Deville Drive
Suite A
Columbia, MO 65203-0057
Phone: (573) 234-2132 Fax: (573) 234-2181

In Reply Refer To:

10/09/2024 14:56:35 UTC

Project Code: 2023-0098059

Project Name: I-670 South Loop Project

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

Threatened and Endangered Species

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and may be affected by your proposed project. The species list fulfills the requirement for obtaining a Technical Assistance Letter from the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. **Note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days.** The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

Consultation Technical Assistance

Refer to the Midwest Region [S7 Technical Assistance](#) website for step-by-step instructions for making species determinations and for specific guidance on the following types of projects:

projects in developed areas, HUD, pipelines, buried utilities, telecommunications, and requests for a Conditional Letter of Map Revision (CLOMR) from FEMA.

Federally Listed Bat Species

Indiana bats, gray bats, and northern long-eared bats occur throughout Missouri and the information below may help in determining if your project may affect these species.

Gray bats - Gray bats roost in caves or mines year-round and use water features and forested riparian corridors for foraging and travel. If your project will impact caves, mines, associated riparian areas, or will involve tree removal around these features – particularly within stream corridors, riparian areas, or associated upland woodlots –gray bats could be affected.

Indiana and northern long-eared bats - These species hibernate in caves or mines only during the winter. In Missouri the hibernation season is considered to be November 1 to March 31. During the active season in Missouri (April 1 to October 31) they roost in forest and woodland habitats. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥ 5 inches diameter at breast height (dbh) for Indiana bat, and ≥ 3 inches dbh for northern long-eared bat, that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Tree species often include, but are not limited to, shellbark or shagbark hickory, white oak, cottonwood, and maple. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat and evaluated for use by bats. If your project will impact caves or mines or will involve clearing forest or woodland habitat containing suitable roosting habitat, Indiana bats or northern long-eared bats could be affected.

Examples of unsuitable habitat include:

- Individual trees that are greater than 1,000 feet from forested or wooded areas;
- Trees found in highly-developed urban areas (e.g., street trees, downtown areas);
- A pure stand of less than 3-inch dbh trees that are not mixed with larger trees; and
- A stand of eastern red cedar shrubby vegetation with no potential roost trees.

Using the IPaC Official Species List to Make No Effect and May Affect Determinations for Listed Species

1. If IPaC returns a result of “There are no listed species found within the vicinity of the project,” then project proponents can conclude the proposed activities will have **no effect** on any federally listed species under Service jurisdiction. Concurrence from the Service is not required for **No Effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records. An example ["No Effect" document](#) also can be found on the S7 Technical Assistance website.

2. If IPaC returns one or more federally listed, proposed, or candidate species as potentially present in the action area of the proposed project – other than bats (see #3 below) – then project proponents can conclude the proposed activities **may affect** those species. For assistance in determining if suitable habitat for listed, candidate, or proposed species occurs within your project area or if species may be affected by project activities, you can obtain [Life History Information for Listed and Candidate Species](#) through the Species website.
3. If IPaC returns a result that one or more federally listed bat species (Indiana bat, northern long-eared bat, or gray bat) are potentially present in the action area of the proposed project, project proponents can conclude the proposed activities **may affect** these bat species **IF** one or more of the following activities are proposed:
 - a. Clearing or disturbing suitable roosting habitat, as defined above, at any time of year;
 - b. Any activity in or near the entrance to a cave or mine;
 - c. Mining, deep excavation, or underground work within 0.25 miles of a cave or mine;
 - d. Construction of one or more wind turbines; or
 - e. Demolition or reconstruction of human-made structures that are known to be used by bats based on observations of roosting bats, bats emerging at dusk, or guano deposits or stains.

If none of the above activities are proposed, project proponents can conclude the proposed activities will have **no effect** on listed bat species. Concurrence from the Service is not required for **No Effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records. An example ["No Effect" document](#) also can be found on the S7 Technical Assistance website.

If any of the above activities are proposed in areas where one or more bat species may be present, project proponents can conclude the proposed activities **may affect** one or more bat species. We recommend coordinating with the Service as early as possible during project planning. If your project will involve removal of over 5 acres of suitable forest or woodland habitat, we recommend you complete a Summer Habitat Assessment prior to contacting our office to expedite the consultation process. The Summer Habitat Assessment Form is available in Appendix A of the most recent version of the [Range-wide Indiana Bat Summer Survey Guidelines](#).

Other Trust Resources and Activities

Bald and Golden Eagles - Although the bald eagle has been removed from the endangered species list, this species and the golden eagle are protected by the Bald and Golden Eagle Act and the Migratory Bird Treaty Act. Should bald or golden eagles occur within or near the project area please contact our office for further coordination. For communication and wind energy projects, please refer to additional guidelines below.

Migratory Birds - The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Service. The Service has the responsibility under the MBTA

to proactively prevent the mortality of migratory birds whenever possible and we encourage implementation of recommendations that minimize potential impacts to migratory birds. Such measures include clearing forested habitat outside the nesting season (generally March 1 to August 31) or conducting nest surveys prior to clearing to avoid injury to eggs or nestlings.

Communication Towers - Construction of new communications towers (including radio, television, cellular, and microwave) creates a potentially significant impact on migratory birds, especially some 350 species of night-migrating birds. However, the Service has developed [voluntary guidelines for minimizing impacts](#).

Transmission Lines - Migratory birds, especially large species with long wingspans, heavy bodies, and poor maneuverability can also collide with power lines. In addition, mortality can occur when birds, particularly hawks, eagles, kites, falcons, and owls, attempt to perch on uninsulated or unguarded power poles. To minimize these risks, please refer to [guidelines](#) developed by the Avian Power Line Interaction Committee and the Service. Implementation of these measures is especially important along sections of lines adjacent to wetlands or other areas that support large numbers of raptors and migratory birds.

Wind Energy - To minimize impacts to migratory birds and bats, wind energy projects should follow the Service's [Wind Energy Guidelines](#). In addition, please refer to the Service's [Eagle Conservation Plan Guidance](#), which provides guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities.

Next Steps

Should you determine that project activities **may affect** any federally listed species or trust resources described herein, please contact our office for further coordination. Letters with requests for consultation or correspondence about your project should include the Consultation Tracking Number in the header. Electronic submission is preferred.

If you have not already done so, please contact the Missouri Department of Conservation (Policy Coordination, P. O. Box 180, Jefferson City, MO 65102) for information concerning Missouri Natural Communities and Species of Conservation Concern.

We appreciate your concern for threatened and endangered species. Please feel free to contact our office with questions or for additional information.

John Weber

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Missouri Ecological Services Field Office

101 Park Deville Drive

Suite A

Columbia, MO 65203-0057

(573) 234-2132

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Gray Bat <i>Myotis grisescens</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6329	Endangered
Indiana Bat <i>Myotis sodalis</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949 General project design guidelines: https://ipac.ecosphere.fws.gov/project/W2VXKS2APJB6NHDO324QU4ZP5U/documents/generated/7280.pdf	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: Kansas City city
Name: Jamie Gregory
Address: 601 E Locust Street
City: Des Moines
State: IA
Zip: 50317
Email: jalane@hntb.com
Phone: 5152598400

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Highway Administration



Missouri Department of Conservation

Missouri Department of Conservation's Mission is to protect and manage the forest, fish, and wildlife resources of the state and to facilitate and provide opportunities for all citizens to use, enjoy and learn about these resources.

Natural Heritage Review Level Three Report: Species Listed Under the Federal Endangered Species Act

There are records of species listed under the Federal Endangered Species Act, and possibly also records for species listed Endangered by the state, or Missouri Species and/or Natural Communities of Conservation Concern within or near the the defined Project Area. Please contact the U.S. Fish and Wildlife Service and the Missouri Department of Conservation for further coordination.

Foreword: Thank you for accessing the Missouri Natural Heritage Review Website developed by the Missouri Department of Conservation with assistance from the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, Missouri Department of Transportation and NatureServe. The purpose of this report is to provide information to federal, state and local agencies, organizations, municipalities, corporations, and consultants regarding sensitive fish, wildlife, plants, natural communities, and habitats to assist in planning, designing, and permitting stages of projects.

PROJECT INFORMATION

Project Name and ID Number: South Loop Project #13357

Project Description: Project to deck over a portion of I-670 from Wyandotte Street to Grand Boulevard in downtown Kansas City, MO

Project Type: Transportation, Structures and Bridges, Other

Contact Person: Jamie Lane

Contact Information: jalane@hntb.com or 5152598400

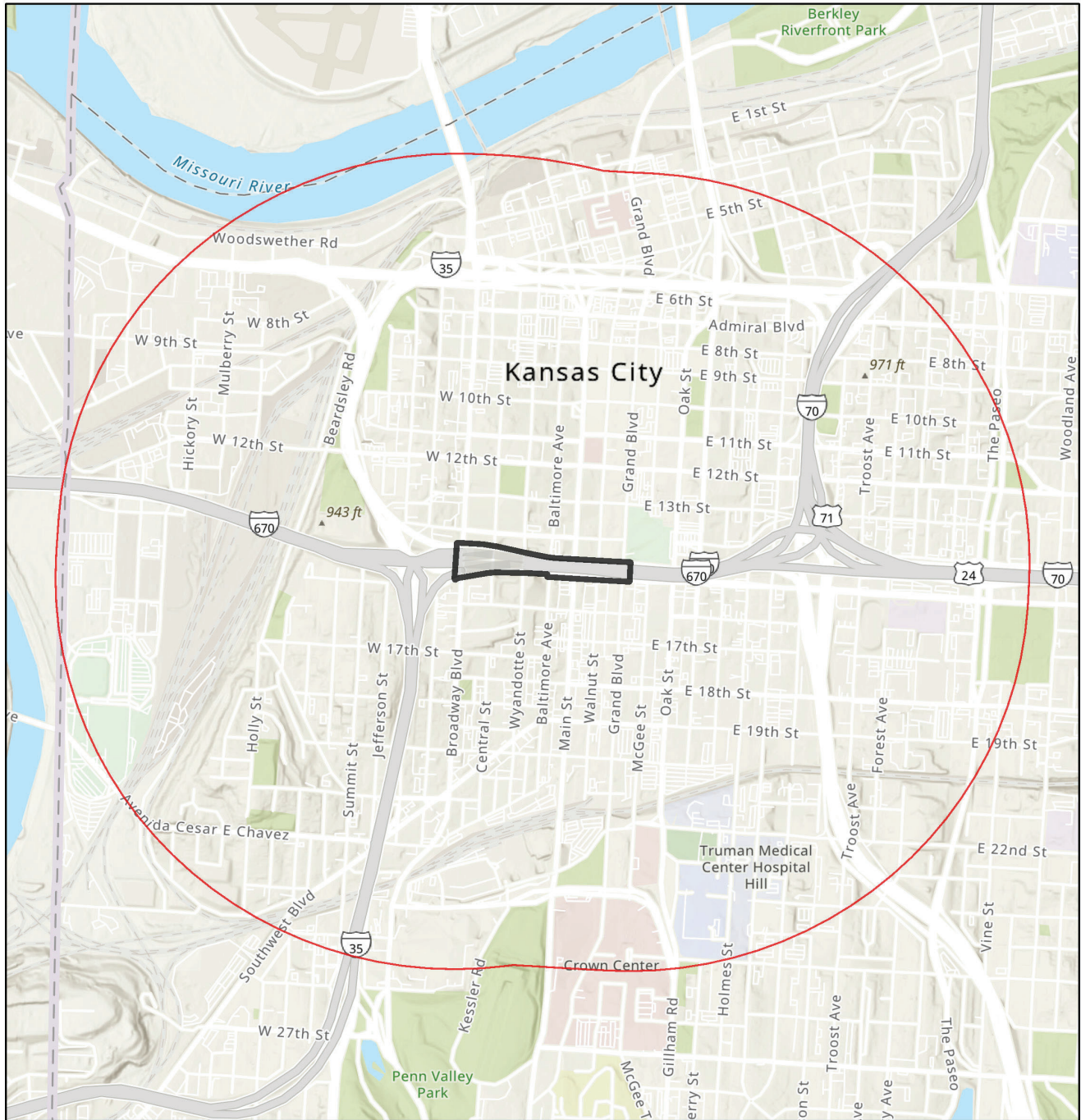
Disclaimer: This NATURAL HERITAGE REVIEW REPORT identifies if a species or natural community tracked by the Natural Heritage Program is known to occur within or near the project area submitted, and shares recommendations to avoid or minimize project impacts to sensitive species or natural habitats. Incorporating information from the Natural Heritage Program into project plans is an important step in reducing impacts to Missouri's sensitive natural resources. If an occurrence record is present, or the proposed project might affect federally listed species, the user must contact the Department of Conservation or U.S. Fish and Wildlife Service for more information.

This Natural Heritage Review Report is not a site clearance letter for the project. Rather, it identifies public lands and records of sensitive resources located close to and/or potentially affected by the proposed project. If project plans or location change, this report may no longer be valid. Because land use conditions change and animals move, the existence of an occurrence record does not mean the species/habitat is still present. Therefore, reports include information about records near but not necessarily on the project site. Lack of an occurrence record does not mean that a sensitive species or natural community is not present on or near the project area. On-site verification is the responsibility of the project. However, the Natural Heritage Program is only one reference that should be used to evaluate potential adverse project impacts and additional information (e.g. wetland or soils maps, on-site inspections or surveys) should be considered. Reviewing current landscape and habitat information, and species' biological characteristics would additionally ensure that Missouri Species of Conservation Concern are appropriately identified and addressed in planning efforts.

U.S. Fish and Wildlife Service – Endangered Species Act (ESA) Coordination: Lack of a Natural Heritage Program occurrence record for federally listed species in your project area does not mean the species is not present, as the area may never have been surveyed. Presence of a Natural Heritage Program occurrence record does not mean the project will result in negative impacts. This report does not fulfill Endangered Species Act consultation with the U.S. Fish and Wildlife Service (USFWS) for listed species. Direct contact with the USFWS may be necessary to complete consultation and it is required for actions with a federal connection, such as federal funding or a federal permit; direct contact is also required if ESA concurrence is necessary. Visit [IPaC: Home \(fws.gov\)](https://www.fws.gov/ipac) to initiate USFWS Information for Planning and Conservation (IPaC) consultation. Contact the Columbia Missouri Ecological Field Services Office (573-234-2132, or by mail at 101 Park Deville Drive, Suite A, Columbia, MO 65203) for more information.

Transportation Projects: If the project involves the use of Federal Highway Administration transportation funds, these recommendations may not fulfill all contract requirements. Please contact the Missouri Department of Transportation at 573-526-4778 or visit [Home Page | Missouri Department of Transportation \(modot.org\)](https://www.modot.org) for additional information on recommendations.

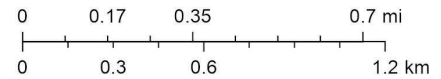
South Loop Project



September 18, 2023

1:22,723

- Buffered Project Boundary
- Project Boundary



Esri, NASA, NGA, USGS, FEMA, Missouri Dept. of Conservation, Missouri DNR, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA

Species or Communities of Conservation Concern within the Area:

There are records of species listed under the Federal Endangered Species Act, and possibly also records for species listed Endangered by the state, or Missouri Species and/or Natural Communities of Conservation Concern within or near the defined Project Area. Please contact the U.S. Fish and Wildlife Service and the Missouri Department of Conservation for further coordination.

Email (preferred): NaturalHeritageReview@mdc.mo.gov
MDC Natural Heritage Review
Science Branch
P.O. Box 180
Jefferson City, MO
65102-0180
Phone: 573-522-4115 ext. 3182

U.S. Fish and Wildlife Service
Ecological Service
101 Park Deville Drive
Suite A
Columbia, MO
65203-0007
Phone: 573-234-2132

Other Special Search Results:

No results have been identified for this project location.

Project Type Recommendations:

Transportation -Structures and Bridges: Other Streams in the area should be protected from soil erosion, water pollution and in-stream activities that modify or diminish aquatic habitats. Please see [Best Management Practices for Construction and Development Projects Affecting Missouri Rivers and Streams \(mo.gov\)](#).

- Avoid disturbance to stream banks and riparian areas. Channel modification, flow interruption or bank modification should occur only in compliance with conditions established in permits required under the federal Clean Water Act.
- Grade and seed disturbed areas as soon as possible to minimize erosion. Native grasses and wildflowers are recommended for plantings compatible with the local native landscape and wildlife needs. Annuals like ryegrass may be combined with native perennials for quicker green-up. Avoid aggressive exotic perennials such as crown vetch and sericea lespedeza.
- All temporary in-channel fills that could impound water should be culverted. Culverts should (a) maintain at least six inches of water and (b) not create water velocities in excess of two feet per second during average annual discharges. A drop between the downstream end of the culverts and the downstream water surface should not occur at any time. Conditions provided within the USACE Clean Water Act Section 404 permit, if required (<http://www.nwk.usace.army.mil/Portals/29/docs/regulatory/moregoffices.pdf>), should help minimize impacts to the aquatic organisms within the area.
- Avoid work in the channel from March 15 until June 15, a time when many fish are spawning and eggs need minimal disturbance.

Project Location and/or Species Recommendations:

Endangered Species Act Coordination - If this project has the potential to alter habitat (e.g. tree removal, projects in karst habitat) or cause direct mortality of bats, please coordinate directly with U.S. Fish and Wildlife Service (Ecological Services, 101 Park Deville Drive, Suite A, Columbia, Missouri 65203-0007; Phone 573-234-2132 Ext. 100 for Ecological Services) for further coordination under the Endangered Species Act. Indiana bats (*Myotis sodalis*, federal- and state-listed endangered) and Northern long-eared bats (*Myotis septentrionalis*, federal-listed threatened) may occur near the project area. Both of these species of bats hibernate during winter months in caves and mines. During the summer months, they roost and raise young under the bark of trees in wooded areas, often riparian forests and upland forests near perennial streams. During project activities, avoid degrading stream quality and where possible leave snags standing and preserve mature forest canopy. Do not enter caves known to harbor Indiana bats or Northern long-eared bats, especially from September to April.

Bald Eagle: The project location submitted and evaluated is within the geographic range of nesting Bald Eagles in Missouri. Bald Eagles (*Haliaeetus leucocephalus*) may nest near streams or water bodies in the project area. Nests are large and fairly easy to identify. Adults begin nesting activity in late December and January and young birds leave the nest in late spring to early summer. While no longer listed as endangered, eagles continue to be protected by the federal government under the Bald and Golden Eagle Protection Act. Work managers should be alert for nesting areas within 1500 meters of project activities, and follow federal guidelines at: [Do I need an eagle take permit? | U.S. Fish & Wildlife Service \(fws.gov\)](#) if eagle nests are seen.

Karst: This county has known karst geologic features (e.g., caves, springs, and sinkholes, all characterized by subterranean water movement). Few karst features are recorded in Natural Heritage records, and ones not noted here may be encountered at the project site or affected by the project. Cave fauna (many of which are Species of Conservation Concern) are influenced by changes to water quality; please check your project site for any karst features and make every effort to protect groundwater in the project area. Additional information and specific recommendations are available at [Management Recommendations for Construction and Development Projects Affecting Missouri Karst Habitat \(mo.gov\)](#).

Pallid Sturgeon: The project location submitted and evaluated is located within or adjacent to the Mississippi or Missouri rivers. Pallid Sturgeons (*Scaphirhynchus albus*, federal- and state-listed endangered) are big river fish that range widely in the Mississippi and Missouri River system (including parts of some major tributaries). Any project that modifies big river habitat or impacts water quality should consider the possible impact to pallid sturgeon populations. See [Pallid Sturgeon Best Management Practices \(mo.gov\)](#) for Best Management Practices. Additional coordination with the U.S. Fish and Wildlife Service under the Endangered Species Act may be necessary (U.S. Fish and Wildlife Service, Ecological Services, 101 Park DeVille Drive, Suite A, Columbia, Missouri 65203-0007; phone 573-234-2132.)

Invasive exotic species are a significant issue for fish, wildlife and agriculture in Missouri. Seeds, eggs, and larvae may be moved to new sites on boats or construction equipment. Please inspect and clean equipment thoroughly before moving between project sites. See [Managing Invasive Species in Your Community | Missouri Department of Conservation \(mo.gov\)](#) for more information.

- Remove any mud, soil, trash, plants or animals from equipment before leaving any water body or work area.
- Drain water from boats and machinery that have operated in water, checking motor cavities, live-well, bilge and transom wells, tracks, buckets, and any other water reservoirs.
- When possible, wash and rinse equipment thoroughly with hard spray or HOT water (>140° F, typically available at do-it-yourself car wash sites), and dry in the hot sun before using again.

Streams and Wetlands – Clean Water Act Permits: Streams and wetlands in the project area should be protected from activities that degrade habitat conditions. For example, soil erosion, water pollution, placement of fill, dredging, in-stream activities, and riparian corridor removal, can modify or diminish aquatic habitats. Streams and wetlands may be protected under the Clean Water Act and require a permit for any activities that result in fill or other modifications to the site. Conditions provided within the U.S. Army Corps of Engineers (USACE) Clean Water Act Section 404 permit ([Kansas City District Regulatory Branch \(army.mil\)](#)) and the Missouri Department of Natural Resources (DNR) issued Clean Water Act Section 401 Water Quality Certification ([Section 401 Water Quality Certification | Missouri Department of Natural Resources \(mo.gov\)](#)), if required, should help minimize impacts to the aquatic organisms and aquatic habitat within the area. Depending on your project type, additional permits may be required by the Missouri Department of Natural Resources, such as permits for stormwater, wastewater treatment facilities, and confined animal feeding operations. Visit [Wastewater Permits | Missouri Department of Natural Resources \(mo.gov\)](#) for more information on DNR permits. Visit both the USACE and DNR for more information on Clean Water Act permitting.

For further coordination with the Missouri Department of Conservation and the U.S. Fish and Wildlife Services, please see the contact information below:

Email (preferred): NaturalHeritageReview@mdc.mo.gov
MDC Natural Heritage Review
Science Branch
P.O. Box 180
Jefferson City, MO
65102-0180
Phone: 573-522-4115 ext. 3182

U.S. Fish and Wildlife Service
Ecological Service
101 Park Deville Drive
Suite A
Columbia, MO
65203-0007
Phone: 573-234-2132

Miscellaneous Information

FEDERAL Concerns are species/habitats protected under the Federal Endangered Species Act and that have been known near enough to the project site to warrant consideration. For these, project managers must contact the U.S. Fish and Wildlife Service Ecological Services (101 Park Deville Drive Suite A, Columbia, Missouri 65203-0007; Phone 573-234-2132; Fax 573-234-2181) for consultation.

STATE Concerns are species/habitats known to exist near enough to the project site to warrant concern and that are protected under the Wildlife Code of Missouri (RSMo 3 CSR 10). "State Endangered Status" is determined by the Missouri Conservation Commission under constitutional authority, with requirements expressed in the Missouri Wildlife Code, rule 3CSR 10-4.111. Species tracked by the Natural Heritage Program have a "State Rank" which is a numeric rank of relative rarity. Species tracked by this program and all native Missouri wildlife are protected under rule 3CSR 10-4.110 General Provisions of the Wildlife Code.

See [Missouri Species and Communities of Conservation Concern Checklist \(mo.gov\)](#) for a complete list of species and communities of conservation concern. Detailed information about the animals and some plants mentioned may be accessed at [Mofwis Search Results](#). Please contact the Missouri Department of Conservation to request printed copies of any materials linked in this document.

October 25, 2023



Mr. Josh Tap
NEPA Program Manager
U.S. Environmental Protection Agency
11201 Renner Boulevard
Lenexa, Kansas 66219

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Mr. Josh Tap:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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If you have any questions about the proposed project, please contact me at (816) 559-3750 or by email at brabineau@portkc.com.

Sincerely,

DocuSigned by:
A handwritten signature in black ink, appearing to read "Brian Rabineau".
F57667212EAA421...

Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Mr. John Weber
Field Supervisor
U.S. Fish and Wildlife Services
Columbia Ecological Services Field Office
101 Park DeVille Drive, Suite A
Columbia, MO 65203-0057

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Mr. John Weber:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Mr. Jorge Lugo-Camacho
State Soil Scientist
U.S. Department of Agriculture
Natural Resources Conservation Service Parkade Center, Suite 250
601 Business Loop 70 West
Columbia, MO 65203

**RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City,
Jackson County, Missouri – LPA 611200**

Dear Mr. Jorge Lugo-Camacho:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Mr. Neal Bedlan
Regional Program Office Team Leader
National Park Service
601 Riverfront Drive
Omaha, Nebraska 68102-4226

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Mr. Neal Bedlan:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Mr. Ken Sessa
Regional Environmental Officer
Federal Emergency Management Agency
11224 Holmes Road
Kansas City, MO 64131

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Mr. Ken Sessa:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Colonel Travis J. Rayfield
District Commander
U.S. Army Corps of Engineers, Kansas City District
Richard Bolling Federal Building
601 E. 12th St.
Kansas City, MO 64106

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Colonel Travis J. Rayfield:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



David Hibbs
Regulatory Branch
U.S. Army Corps of Engineers, Kansas City District
Richard Bolling Federal Building
601 E. 12th St.
Kansas City, MO 64106

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear David Hibbs:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Ms. Melissa "Missy" Newman
Executive Assistant
Missouri Department of Natural Resources
Director's Office
P.O. Box 176
Jefferson City, MO 65102

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Ms. Missy Newman:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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Sincerely,

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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Mr. James Remillard
Director
State Emergency Management Agency
2302 Militia Drive
P.O. Box 116
Jefferson City, MO 65102

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Mr. James Remillard:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Ms. Toni Prawl
State Historic Preservation Officer
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Ms. Toni Prawl:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Sarah Vanderfeltz
Office Administration
Federal Assistance Clearinghouse
State Capitol Building, Room 125
201 West Capitol Avenue, P.O. Box 809
Jefferson City, MO 65102

**RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City,
Jackson County, Missouri – LPA 611200**

Dear Sarah Vanderfeltz:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Mr. David Thorne
Policy Coordination
Missouri Department of Conservation
P.O. Box 180
Jefferson City, MO 651012

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Mr. David Thorne:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Mayor Quinton Lucas
City of Kansas City, Missouri
City Hall
414 E. 12th St.
Kansas City, MO 64106

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Mayor Quinton Lucas:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Cathy Monroe
Director, Planning & Program Development
Federal Transit Administration, Region 7
901 Locust St. Suite 404
Kansas City, MO 64106

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Cathy Monroe:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



T'Risa McCord
Interim President
Economic Development Corporation of Kansas City
1100 Walnut St.
Kansas City, MO 64106

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear T'Risa McCord:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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To remain on schedule, it is requested that your agency respond with any comments you may have on the Alternatives Memorandum within 30 days of receipt of this letter. Comments and information you provide during the EA will be used to determine if the proposed improvements may have impacts that warrant further consideration prior to design and construction of the project. Your comments will be incorporated into the environmental clearance process and ultimately the EA document, as appropriate. Additional project information can be found at kcsouthloopproject.org.

If you have any questions about the proposed project, please contact me at (816) 559-3750 or by email at brabineau@portkc.com.

Sincerely,

DocuSigned by:
A handwritten signature in black ink, appearing to read "Brian Rabineau".
F57667212EAA421...

Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Joe Reardon
President and Chief Executive Officer
Kansas City Chamber of Commerce
30 W. Pershing Rd. Suite 301
Kansas City, MO 64108

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Joe Reardon:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

As part of the NEPA Concurrence Process for the project, an Alternatives Memorandum has been prepared to document the range of alternatives for the project. The range of alternatives have been shared with the project advisory group and the public during public and stakeholder engagement in September 2023 to provide an opportunity for public review and comment.

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To remain on schedule, it is requested that your agency respond with any comments you may have on the Alternatives Memorandum within 30 days of receipt of this letter. Comments and information you provide during the EA will be used to determine if the proposed improvements may have impacts that warrant further consideration prior to design and construction of the project. Your comments will be incorporated into the environmental clearance process and ultimately the EA document, as appropriate. Additional project information can be found at kcsouthloopproject.org.

If you have any questions about the proposed project, please contact me at (816) 559-3750 or by email at brabineau@portkc.com.

Sincerely,

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F57667212EAA421...

Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Jeffrey Williams
City Planning Director
City of Kansas City Planning and Development Department
City Hall
414 E 12th St. Suite 12
Kansas City, MO 64106

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Jeffrey Williams:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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If you have any questions about the proposed project, please contact me at (816) 559-3750 or by email at brabineau@portkc.com.

Sincerely,

DocuSigned by:
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F57667212EAA421...

Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Michael Shaw
Public Works Director
City of Kansas City Public Works Department
City Hall
414 E 12th St. Suite 12
Kansas City, MO 64106

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Michael Shaw:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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If you have any questions about the proposed project, please contact me at (816) 559-3750 or by email at brabineau@portkc.com.

Sincerely,

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A handwritten signature in black ink, appearing to read "Brian Rabineau".
F57667212EAA421...

Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Robert Harris
President
Crossroads Community Association of Kansas City
P.O. Box 414806
Kansas City, MO 64141

**RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City,
Jackson County, Missouri – LPA 611200**

Dear Robert Harris:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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If you have any questions about the proposed project, please contact me at (816) 559-3750 or by email at brabineau@portkc.com.

Sincerely,

DocuSigned by:
A handwritten signature in black ink, appearing to read "Brian Rabineau".
F57667212EAA421...

Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Peter Carnesciali
President
Kansas City Downtown Neighborhood Association
P.O. Box 26053
Kansas City, MO 64196

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Peter Carnesciali:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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If you have any questions about the proposed project, please contact me at (816) 559-3750 or by email at brabineau@portkc.com.

Sincerely,

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A handwritten signature in black ink, appearing to read "Brian Rabineau".
F57667212EAA421...

Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Tom Gerend
Executive Director
Kansas City Streetcar Authority
600 E 3rd St.
Kansas City, MO 64106

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Tom Gerend:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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If you have any questions about the proposed project, please contact me at (816) 559-3750 or by email at brabineau@portkc.com.

Sincerely,

DocuSigned by:
A handwritten signature in black ink, appearing to read "Brian Rabineau".
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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



David Warm
Executive Director
Mid-America Regional Council
600 Broadway Blvd. Suite 200
Kansas City, MO 64105

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear David Warm:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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To remain on schedule, it is requested that your agency respond with any comments you may have on the Alternatives Memorandum within 30 days of receipt of this letter. Comments and information you provide during the EA will be used to determine if the proposed improvements may have impacts that warrant further consideration prior to design and construction of the project. Your comments will be incorporated into the environmental clearance process and ultimately the EA document, as appropriate. Additional project information can be found at kcsouthloopproject.org.

If you have any questions about the proposed project, please contact me at (816) 559-3750 or by email at brabineau@portkc.com.

Sincerely,

DocuSigned by:
A handwritten signature in black ink, appearing to read "Brian Rabineau".
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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Frank White, III
President and CEO
Kansas City Area Transportation Authority
1200 E 18th St.
Kansas City, MO 64108

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Frank White, III:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

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If you have any questions about the proposed project, please contact me at (816) 559-3750 or by email at brabineau@portkc.com.

Sincerely,

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A handwritten signature in black ink, appearing to read "Brian Rabineau".
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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Santos Ramirez
Director of Operations, Community Improvements District
Downtown Kansas City Community Improvement District
1000 Walnut St. Suite 200
Kansas City, MO 64106

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Santos Ramirez:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

As part of the NEPA Concurrence Process for the project, an Alternatives Memorandum has been prepared to document the range of alternatives for the project. The range of alternatives have been shared with the project advisory group and the public during public and stakeholder engagement in September 2023 to provide an opportunity for public review and comment.

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To remain on schedule, it is requested that your agency respond with any comments you may have on the Alternatives Memorandum within 30 days of receipt of this letter. Comments and information you provide during the EA will be used to determine if the proposed improvements may have impacts that warrant further consideration prior to design and construction of the project. Your comments will be incorporated into the environmental clearance process and ultimately the EA document, as appropriate. Additional project information can be found at kcsouthloopproject.org.

If you have any questions about the proposed project, please contact me at (816) 559-3750 or by email at brabineau@portkc.com.

Sincerely,

DocuSigned by:
A handwritten signature in black ink, appearing to read "Brian Rabineau".
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Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

October 25, 2023



Frank White, Jr.
County Executive
Jackson County, Missouri
Jackson County Courthouse
415 E 12th St.
Kansas City, MO 64106

RE: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Frank White, Jr.:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP).

As part of the NEPA Concurrence Process for the project, an Alternatives Memorandum has been prepared to document the range of alternatives for the project. The range of alternatives have been shared with the project advisory group and the public during public and stakeholder engagement in September 2023 to provide an opportunity for public review and comment.

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If you have any questions about the proposed project, please contact me at (816) 559-3750 or by email at brabineau@portkc.com.

Sincerely,

DocuSigned by:
A handwritten signature in black ink, appearing to read "Brian Rabineau".
F57667212EAA421...

Brian Rabineau
General Counsel
Port Authority of Kansas City

Enclosures:

Alternatives Memorandum

From: Melissa Scheperle <Melissa.Scheperle@modot.mo.gov>
Sent: Tuesday, October 24, 2023 10:37 AM
To: Brandon Yarbrough
Subject: FW: FHWA-MoDOT; NEPA Notification; South Loop Project (SLP), LPA 611200, Jackson County, I-670
Attachments: [2023-10.12-KC_SLP-AlternativesMemo.docx](#)

It went out.

From: Peters, Taylor (FHWA) <taylor.peters@dot.gov>
Sent: Tuesday, October 24, 2023 10:30 AM
To: lfoster@iowas.org; akelley@iowas.org; CPershall@iowanation.org; srichardson@kawnation.com; luke.morris@osagenation-nsn.gov; s106@osagenation-nsn.gov; THPO@MiamiNation.com; ssettje@poncatribes-ne.org; liana.hesler@ponca-nsn.gov; lisa.montgomery@sacfoxenviro.org; director.historic@meskwaki-nsn.gov; Carol.Butler@sacandfoxnation-nsn.gov; tonya@shawnee-tribe.com; sclemons@wyandottenation.org
Cc: Michael Meyer <Michael.Meyer@modot.mo.gov>; Melissa Scheperle <Melissa.Scheperle@modot.mo.gov>; Karen Daniels <Karen.Daniels@modot.mo.gov>
Subject: FHWA-MoDOT; NEPA Notification; South Loop Project (SLP), LPA 611200, Jackson County, I-670

To Whom it May Concern:

This letter is regarding the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC), and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri. The project is known locally as the South Loop Project (SLP), LPA 611200.

As part of the NEPA Concurrence Process for the project, an Alternatives Memorandum has been prepared to document the range of alternatives for the project and we are soliciting comments from your Tribal Nation regarding the proposed project to effect cultural resources that may be of historical or religious significance. The range of alternatives have been shared with the project advisory group and the public during public and stakeholder engagement in September 2023 to provide an opportunity for public review and comment.

A copy of the Alternatives Memorandum is enclosed with this letter to provide an opportunity for review and comment as an interested tribal nation for the project. Additional project information can be found at <https://kcsouthloopproject.org>.

Comments and information you provide during the EA will be used to determine if the proposed improvements may have impacts that warrant further consideration prior to design and construction of the project. Your comments will be incorporated into the environmental clearance process and ultimately the EA document, as appropriate; any locational information regarding cultural resources will be kept confidential.

If you have any comments or requests for additional information concerning this project, please contact Melissa Scheperle and Michael Meyer (with the MoDOT Environmental and Historic Preservation Section who are included on this email) and copy me.

Sincerely,

Taylor Peters
Environmental Protection Specialist
Missouri Division Office
Federal Highway Administration
3220 W. Edgewood, Suite H
Jefferson City, Missouri 65109
573-638-2621



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, KANSAS CITY DISTRICT
601 E. 12TH STREET, 635 FEDERAL BUILDING
KANSAS CITY, MO 64106-2824

October 31, 2023

Regulatory Branch
NWK-2023-00354

Mr. Brian Rabineau
General Counsel
Port Authority of Kansas City
110 Berkley Plaza
Kansas City, MO 64120

Dear Mr. Rabineau:

This is in reply to your notification dated May 12, 2023, regarding the notice of intent for the Kansas City, South Loop Project and the initiation of consultation for the project by letter dated October 25, 2023. The proposed project would construct a structural deck over a portion of I-670 within downtown Kansas City, Missouri. The project is located within Section 5, Township 49 north, Range 33 west, Jackson County, Missouri.

We have reviewed the draft purpose and need statement and alternatives for the project and have no comments or objections. The Corps of Engineers has jurisdiction over all waters of the United States. Discharges of dredged or fill material in waters of the United States, including wetlands, require prior authorization from the Corps under Section 404 of the Clean Water Act (USC 1344). The implementing regulations for this Act is found at 33 CFR 320-332.

Should the proposed improvements require the discharge of dredged or fill material in any waters of the United States, including wetlands, a Department of the Army (DA) permit will be required. Federal regulations require that a DA permit be issued by the Corps of Engineers prior to the initiation of any construction on the portion of a proposed activity which is within the Corps' regulatory jurisdiction. If the proposed improvements do not require the discharge of dredged or fill material in any waters of the United States, including wetlands, a DA permit will not be required.

If you have any questions concerning this matter, please feel free to contact me at 816-389-3703 or by email at brian.t.donahue@usace.army.mil. Please reference Permit No. NWK-2023-00354 in all comments and/or inquiries relating to this project. This letter is only being provided to you electronically at: brabineau@portkc.com.

Sincerely,

Brian Donahue

Brian Donahue
Regulatory Project Manager



United States Department of the Interior
NATIONAL PARK SERVICE
Interior Regions 3, 4, 5
601 Riverfront Drive
Omaha, NE 68102

(MWR-LWCF)
via brabineau@portkc.com

November 2, 2023

Mr. Brian Rabineau
General Counsel
Port Authority of Kansas City
HNTB
c/o South Loop Project
715 Kirk Drive
Kansas City, MO 64105

Re: Kansas City South Loop Project NEPA Environmental Assessment (EA), Kansas City, Jackson County, Missouri – LPA 611200

Dear Mr. Rabineau:

The National Park Service has reviewed the October 25, 2023, letter about the Kansas City South Loop Project. This letter referenced the Environmental Assessment (EA) being prepared by Port KC, the Downtown Council (DTC) and the City of Kansas City (KCMO), in cooperation with the Federal Highway Administration and the Missouri Department of Transportation (MoDOT) to construct a proposed structural deck over a four-block portion of Interstate 670 (I-670), in downtown Kansas City, Missouri.

In the proposed study area of the Alternatives Memorandum document that accompanied the letter, it detailed three proposed alternatives to develop a park above I-670 and along Truman Road between Wyandotte Street to Grand Boulevard, in downtown Kansas City, Missouri.

Although, no federally assisted Land and Water Conservation Fund (LWCF) sites were noted in the Alternative Memorandum document, we recommend you also consult directly with the official who administers the LWCF program in the State of Missouri, to determine any interest in the project or potential impact to parks near the proposed site.

The administrator for the LWCF program in Missouri is Mr. Brian Stith, LWCF Program Coordinator, Missouri State Park, Grants Management Section, P.O. Box 176, Jefferson City, MO 65102-0176 or via electronic mail at brian.stith@dnr.mo.gov. The Grant Management Section may also be reached at phone number 573-751-8661.

If you need any further assistance, please contact me via email at andrea_messam@nps.gov or by phone at 402-661-1564.

Sincerely,

ANDREA MESSAM

Digitally signed by ANDREA
MESSAM
Date: 2023.11.02 16:25:55 -05'00'

Andrea Messam
Compliance Officer
Recreation Grant Programs

cc:

Mr. Brian Stith, LWCF Program Coordinator, Missouri State Park, Grants Management Section,
P.O. Box 176, Jefferson City, MO 65102-0176

KC STREETCAR AUTHORITY™

November 14th, 2023

Brian Rabineau
General Council
Port Authority of Kansas City

**RE: Kansas City South Loop Project- NEPA Environmental Assessment (EA), Kansas City,
Jackson County, Missouri- LPA 611200**

On behalf of the Kansas City Streetcar Authority (KCSA) Board of Directors, we thank you for the opportunity to comment on the South Loop NEPA Environmental Assessment (LPA 611200).

Our Board of Directors (Board), made up of long-standing downtown supporters and midtown interests, is excited about the direction and trajectory of downtown Kansas City and the South Loop Project. However, the Board feels strongly that additional work is required to understand and mitigate potential traffic and transit service impacts that could result from the South Loop Project alternatives currently under consideration. We must ensure current efforts do not undermine the long-term effectiveness, accessibility, and reliability of the \$600m, 6.5-mile streetcar system we are investing in and expanding with the aid of significant Federal Transit Administration funding and support. It is in our shared interest that we further the analysis underway to ensure the design decisions made on the South Loop Project today support our joint desire for a prosperous, vibrant, and connected downtown.

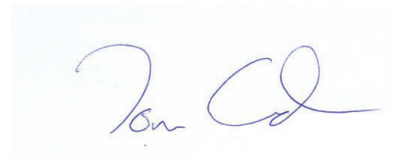
It is our understanding the traffic analysis conducted to date only evaluated Monday through Friday typical peak periods and has not yet taken into consideration additional known factors suggested by project stakeholders in addition to Kansas City's Public Works and City Planning Departments. Those factors include the need to assess cumulative effects of newly proposed closures in addition to reoccurring adjacent road closures, planned adjacent developments including a potential downtown baseball stadium, and special event traffic dynamics that already constrain our downtown grid and impact public transit service reliability on Main Street and Grand Boulevard.

We would ask the South Loop project team to advance a supplemental traffic analysis in partnership with KCSA, KCATA, Kansas City's Public Works, and City Planning Departments prior to formalization of a Locally Preferred Alternative. This analysis should reflect known factors such as routine road closures on Grand Boulevard and 14th Street, special event traffic demands, and planned developments in the immediate vicinity, with the expectation any

resulting forecasted impacts to transit service reliability are paired with in-kind mitigations that demonstrate transit service reliability is maintained or improved as the South Loop improvements advance.

Our Kansas City Streetcar system is often regarded as the best modern streetcar system in the country and is key to downtown's health, vibrancy, and connectivity. The systems' value will only grow in importance as we expand to provide critical high-capacity transit access to 40,000+ people and more than 100,000 jobs upon system expansion to the Riverfront, Midtown, the Country Club Plaza, and the University of Missouri-Kansas City in 2025. We appreciate your partnership and support as we work together to make the South Loop project an accessible asset for all of Kansas City.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom Gerend", is centered within a light blue rectangular box.

Tom Gerend
Executive Director
KC Streetcar Authority

CC: Michael Collins, KCSA Chairman
KCSA Board of Directors



City Planning and Development

Long Range Planning

Luke Ranker
City Hall
414 E 12th Str
Kansas City, Missouri 64106

816-513-2802

Date: Nov. 29, 2023
To: Chris Handzel, HNTB
From: Luke Ranker, Planner City of Kansas City Long Range Planning
Subject: South Loop Project

The following are comments on the alternative design concepts presented for the South Loop Project based on applicable long-range plans adopted by the City of Kansas City, Missouri.

KC Spirit Playbook

The South Loop project advances several goals from the KC Spirit Playbook, Kansas City's new comprehensive plan, related to improving connectivity and access to open and green spaces. The Playbook calls for the removal of barriers created by highways and improving pedestrian connections between existing neighborhoods. As it relates to open and green spaces, the Playbook specifically directs the city to explore improving spaces in the public right-of-way with native plants and similar landscaping as well as increasing resident access to open space with new or improved parkland in densely populated areas. The South Loop and downtown would be a prime example of this.

The No Build Alternative would not advance these goals. The capping alternatives all help advance the Playbook fairly equally, but the Double Superblock Alternative is most in line with the Playbook's parkland goals as it appears to create the most open space. Regardless, when narrowing westbound and eastbound Truman Road, the project should consider green infrastructure, such as bioswales in the right of way, to manage stormwater runoff. Similar infrastructure can be seen along 20th Street from Main St. to Grand Blvd. Within the lid park, native plants and pervious surfaces should be utilized to help advance sustainability and environmental health.

Greater Downtown Area Plan



Capping I-670 in the south loop is identified repeatedly as a priority in the Greater Downtown Area Plan and described as a “catalyst project.” As such, the No Build Alternative would not meet the area plan’s long-term goal of improving connectivity between the CBD and the Crossroads. Both Main and Grand are identified as secondary gateways to downtown at I-670/Truman Road. These gateways should designate passages between neighborhoods or districts with robust streetscape improvements, gateway features, and signage identifying the neighborhood or district. Generally, the GDA plan encourages the creation of new open space, specifically spaces that activate “public spaces that will involve private & public sector.”

Grand Boulevard should have a fully separated mobility lane, per GRA’s bike recommendations. Any work along this street should maintain or improve existing separated lanes. Baltimore and Walnut have shared bike lanes. If either or both streets are closed, the alternatives should accommodate mobility connections through the park between the CBD and Crossroads. Main and Wyandotte do not appear in the bikeway recommendations.

Major Street Plan

Walnut Street is not identified as a major street typology, so closing this street would likely have minimal impact on traffic and would not require changes to the Major Street Plan. Wyandotte and Baltimore streets are “activity streets,” which are narrow with slower, more pedestrian-oriented traffic. Closure of these streets for the Western Superblock or Double Superblock alternatives would have a minor impact on connectivity. Main Street is designated as a “commercial/mix use” corridor beginning at Truman Road south into the Crossroads. This street type is meant to promote connectivity in a grid-like manner, so closing Main would require a major street plan amendment and not be advisable. The same is true for Grand Boulevard, as its “boulevard” designation is meant to promote connectivity. In either case, both streets should have narrow lanes and landscaped rights-of-way.

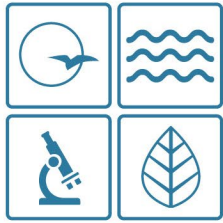
Trails KC/Kansas City Walkability

The city’s walkability plan, though several years old, does note that the entirety of the Loop creates a pedestrian barrier around downtown. It proposes improving pedestrian access and safety across Interstate 670. A No Build Alternative would not provide sufficient improvements to pedestrian safety. The multiple street crossings required in the Individual Blocks Alternative create additional conflict points between pedestrians and traffic as park goers attempt to move between the parks.



Alternati





MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Mike Kehoe
Governor

Kurt U. Schaefer
Director

January 14, 2025

Mario Vasquez
City of Kansas City
414 E 12th Street
Kansas City, MO 64106

Re: SHPO Project Number: 158-JA-23 — Kansas City South Loop Project Environmental Assessment – MoDOT and City of Kansas City right of way for I-670 and Truman Road North and Truman Road South, Kansas City, Jackson County, Missouri (FHWA)

Dear Mario Vasquez:

Thank you for submitting information to the State Historic Preservation Office (SHPO) regarding the above-referenced project for review pursuant to Section 106 of the National Historic Preservation Act, P.L. 89-665, as amended (NHPA), and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800, which require identification and evaluation of historic properties.

We have reviewed the information regarding the above-referenced project and have included our comments on the following page(s). Please retain this documentation as evidence of consultation with the Missouri SHPO under Section 106 of the NHPA. SHPO concurrence does not complete the Section 106 process as federal agencies will need to conduct consultation with all interested parties. **Please be advised that, if the current project area or scope of work changes, such as a borrow area being added, or cultural materials are encountered during construction, appropriate information must be provided to this office for further review and comment.**

If you have questions, please contact the SHPO at (573)751-7858 or call/email Charles Horton (573) 526-4591, charles.horton@dnr.mo.gov. If additional information is required, please submit the information via email to MOSection106@dnr.mo.gov.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Dawn Scott, Director
Deputy State Historic Preservation Officer

c: Rebecca Rost, FHWA
Melissa Scheperle, MoDOT
Rachel Campbell, MoDOT



January 14, 2025

Mario Vasquez

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SHPO Project Number: 158-JA-23 — Kansas City South Loop Project Environmental Assessment
– MoDOT and City of Kansas City right of way for I-670 and Truman Road North and Truman Road
South, Kansas City, Jackson County, Missouri (FHWA)

COMMENTS:

Thank you for providing us with the updated alternative preferred alternatives for the Kansas City South Loop Project. We have received this information and filed it with the rest of the project documents. SHPO has no comments on the proposed project at the current time. We look forward to **continuing to consult** with you as the project moves forward and more details are known about the chosen alternative.