

NEPA IMPLEMENTATION PLAN

This Planning and Environmental Linkages (PEL) Study is intended to provide the framework for the long-term implementation of transportation improvements, considering needs, funding, and requirements for future NEPA documentation. In addition, the PEL Study provides information to support the NEPA process, including issues that require additional evaluation, and recommends methods to address those issues in future NEPA documentation.

FUTURE ACTIVITIES

The PEL Study provides the framework for the short-term and long-term implementation of the transportation strategies as funding becomes available, but it does not provide the detailed analysis required to obtain approvals to begin design and construction. In short, there are still several steps that must be accomplished before any of the strategies identified in this document can be implemented. More specifically, further study will be required in a number of areas as described in more detail in the remainder of this chapter.

Fiscally Constrained Plan

With the exception of **Area A: Missouri River Bridge and Interchange** which includes the rehabilitation or replacement of the Buck O'Neil Bridge, funding for the recommended strategies in the other geographic regions has not been identified at this time. However, the identification of recommended strategies for each of the other regions is consistent with FHWA's objective of analyzing and selecting transportation solutions on a broad enough scale to provide meaningful analysis and avoid segmentation.

Fiscal constraint requirements must be satisfied for FHWA, MoDOT and MARC to move any of the other recommended strategies forward into the NEPA decision-making phase of study. Before FHWA, MoDOT and MARC can sign a final NEPA decision document (Record of Decision, Finding of No Significant Impact, or programmatic or non-programmatic Categorical Exclusion), the proposed project, as defined in the NEPA document, must meet the following specific fiscal-constraint criteria:

- The proposed project or phases of the proposed project within the time horizon of the Regional Transportation Plan (RTP) must be included in the fiscally-constrained RTP, and other phase(s) of the project and associated costs beyond the RTP horizon must be referenced in the fiscally-unconstrained vision component of the RTP.
- The project must be in the fiscally-constrained TIP, which includes:
 - Federal-Aid projects or project phases and state/locally funded, regionally significant projects that require a federal action.
 - Full funding is reasonably available for the completion of all project phases within the time period anticipated for completion of the project.
 - At least one subsequent project phase, or the description of the next project phase must be in the fiscally-constrained TIP.
 - For project phases that are beyond the TIP years, the project must be in the fiscally-constrained RTP and the estimated total project cost must be described within the financial element of the RTP and/or applicable TIP.

Independent Utility and Logical Termini

In cases where a project is implemented in more than one phase, which this one will be, care must be taken to ensure that the transportation system operates acceptably at the conclusion of each phase. This is referred to as “independent utility” – the ability of each phase to operate independently of each other. Additionally, it must be demonstrated that air quality conformity will not be jeopardized. Any mitigation measures needed in response to project impacts must be implemented with the phase in which the impacts occur, rather than deferred to a later phase. More specifically, the implementation phases established as part of this project must meet the following criteria:

- **Independent Utility** - Each phase should have independent utility and logical termini to the extent that the phase provides a functional transportation system even in the absence of other phases.
- **Elements of Purpose and Need** - Each phase should contribute to meeting the purpose and need for the entire project.
- **Environmental Impacts** - Individual phases should avoid the introduction of substantial additional environmental impacts that cannot be mitigated.

NEPA Environmental Decision-Making

Once funding is secured, the NEPA environmental planning process can be initiated. The environmental process will build on the environmental work, public outreach, and agency outreach already completed in this PEL Study. The NEPA processes that would be anticipated could be either an Environmental Impact Statement (EIS), Environmental Assessment (EA) or a Categorical Exclusion (CE).

- **Categorical Exclusions** - CEs are the most common NEPA documents and are for actions that do not individually or cumulatively have a significant environmental impact, are excluded from the requirement to prepare an EA or EIS, and do not have substantial public controversy. CEs are defined in 23 CFR 771.117 and meet the definition from the Council on Environmental Quality in 40 CFR 1508.4 and are based on the past experience with similar actions of FHWA.
- **EA/EIS** - An EA would be prepared and submitted through the successive review processes of MARC, MoDOT and FHWA. The public would have 30 days to review and comment before FHWA makes its final decision. MARC and MoDOT will consider use of a streamlined EA template for this project to accelerate the timeline for the environmental process, while still allowing for appropriate agency coordination and public involvement. If, at any point in the EA process, FHWA determines that the action would likely have a significant impact on the environment, that EA process would stop and the preparation of an EIS would be required. If FHWA agrees the action would have no significant impacts on the environment, FHWA would prepare a Finding of No Significant Impact to serve as the decision document for the proposed action.

Issues that will need to be considered during the NEPA process, including potential resource impacts and potential mitigation requirements are summarized below:

- **Land Use and Planning** – Any direct effects to businesses or residences (acquisitions) and associated displacement assistance under the provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 would need to be considered during a NEPA-level study. Any indirect effects stemming from access alteration due to the project with associated land use and development effects (induced development; alteration of land development patterns) would also need consideration, to ensure the project is compatible with the MARC regional growth. The consistency of the proposed projects with other local city planning would also need to be ensured throughout the NEPA process.
- **Socioeconomic Factors** – Any impacts to low income and minority populations would need to be assessed in accordance with EO 12898 Federal Actions to Address Environmental Justice (EJ) in Minority Populations and

Low-Income Populations and mitigation would be provided if warranted. The NEPA study would also include measures to ensure the opportunity for participation and input from EJ populations in the project development process.

- **Community Resources** – Although direct impacts to these resources would not be anticipated, potential impacts stemming from indirect effects of the project such as access alteration would be assessed, if warranted.
- **Existing Transportation Infrastructure** – Connectivity of a proposed strategy with the existing transportation infrastructure, as well as project effects on local access and mobility must be considered during the NEPA process. Compatibility of non-roadway strategies with prospective transit and rail improvements must also be considered.
- **Water Resources** – NEPA-level studies would need to consider impacts to jurisdictional waters and wetlands, including Section 404 permit and potential mitigation requirements. Consideration would need to be given to the drainage and irrigation features during design so as to not compromise the function of ditches or drains in the Study Area.
- **Floodplains** – Design requirements to prevent floodplain impacts would need to be considered, along with appropriate coordination requirements with local FEMA floodplain officials.
- **Air Quality** – Demonstration of consistency of the proposed strategies with the MARC Regional Transportation Plan (RTP) and current STIP would be needed. Air quality analyses may need to be prepared in accordance to air quality regulations and guidelines.
- **Traffic Noise** – Traffic noise impacts would need to be determined in accordance with applicable guidelines. If the project results in noise impacts, noise abatement measures would need to be considered and evaluated for implementation into the project design. If noise abatement is proposed, noise workshops would take place.
- **Hazardous Materials** – A Phase I initial site assessment would be performed on a preferred strategy during the NEPA process. Phase II site investigations may be required, depending on the results of the Phase I assessment, project design, and locations of proposed right-of-way locations. Any mitigation requirements for hazardous materials sites would be discussed.
- **Biological Resources** – If a federally-listed species or its habitat was determined to be affected by the preferred strategy, a biological assessment would be required with and affect determination (No Effect, May Affect, but is not likely to Adversely Affect; or May Affect, is likely to Adversely Affect) for submittal to the USFWS to initiate consultation. Consultation would be informal or formal depending on proposed impacts. Similarly, any impacts to state-listed species would be coordinated with the MDC. In addition to listed species, any impacts to migratory birds would require coordination with the USFWS.
- **Parks and Recreation Facilities** – Any direct impacts (taking) and construction-use impacts to parks and recreation areas would be quantified and/or assessed for a proposed project-level strategy during the NEPA study. Section 4(f) coordination with the FHWA would be undertaken. Avoidance and minimization of impacts would be determined during the coordination effort.
- **Historic and Cultural Resources** – Any effects (direct and indirect) to historic and archaeological resources during project-specific NEPA studies using an area of potential effect (APE) would be summarized in future project-specific research designs, historic resources survey reports or archaeological survey reports and coordination with the SHPO would be undertaken. As warranted, project design would be modified to avoid adverse impacts to historic resources.
- **Utilities/Transmissions** – Adjustment or relocation of aboveground or underground utilities, and associated costs, would be considered in the NEPA study.
- **Prime Farmland** – No impacts are anticipated since there are no identified prime farmlands within the study area.

Depending on the timing of future NEPA efforts, resources may require reassessment due to new regulations, changes to listed threatened and endangered species, age of data, etc. In summary, the data collected during the PEL Study will serve as a baseline for NEPA analyses, however, it would be supplemented with more project-specific data and field reconnaissance information.

Scoping, Preliminary, and Final Engineering Design

After project funding has been identified and the projects are included in the TIP, a planning-level estimate is prepared to determine how much funding is needed for each project and phase (e.g., ROW, utilities, environmental, design and construction). A project-scoping meeting can be held before or after the selection of a project delivery method to establish the project objectives; to identify the design standards, funding sources and amounts, the resources necessary to complete the project, and the schedule; and to complete the preliminary survey request.

Once the project goals and constraints are refined, the delivery schedule, complexity, and innovation opportunities can be used to determine the appropriate delivery method. These methods may include a design-bid-build (DBB) or design-build (DB). Once the delivery method is selected, the level of design, contractor selection process, and participation can be initiated.

If the project delivery method is DBB, after the design level survey is received, the preliminary design phase of the project begins. A field review meeting is held to review the site conditions with 30 percent plans complete. The plans are reviewed with MoDOT, the applicable local governments, and representatives from the utility companies to identify tasks needed to complete the project. The preliminary cost estimate is developed and compared to the available budget. Once the design is at the stage that the ROW limits can be identified, plans can be prepared and acquisition initiated. Final Design proceeds until the Plans, Specification and Estimate package is 95 percent complete. A final review meeting is then conducted to complete the review process. The project funding is then obligated and authorized once all clearances are obtained and then the project is advertised for construction.

If the project delivery method is DB then the owner will select a DB team of designers and contractors to complete the project. An engineering firm may be contracted to develop the 30 percent design plans. The factors used in the selection of the DB team typically include qualifications, duration, price and innovation.

Acquisition of Property for Right-of-Way (ROW)

The limits of the existing ROW for the planned improvements will be determined from record information and field surveys. The preferred or final design strategies will then be overlaid on the ROW base to determine impacts that will require additional ROW fee or easement acquisitions. When acquisitions are necessary, a title report is ordered and used to prepare property descriptions, exhibits, and ROW plans to support the acquisition process. Once these documents clearly define the impact, property appraisal is then ordered to determine the value of the property to be acquired. The acquisition process will commence after all of this information has been compiled. Typically, the time frame between identification and transfer of ownership takes about 18 months to meet all of the requirements of the Uniform Relocation Act. However, it may be possible to obtain possession earlier based on project needs. In some cases, if the property is rendered unusable or if it is a total take, relocation services may be necessary.

Construction

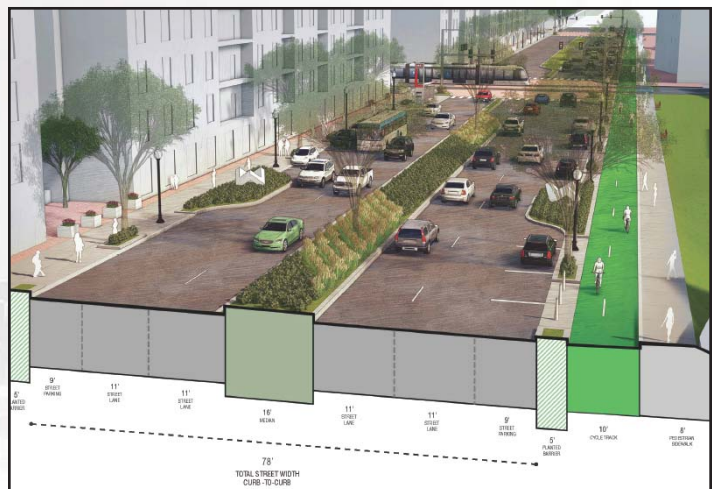
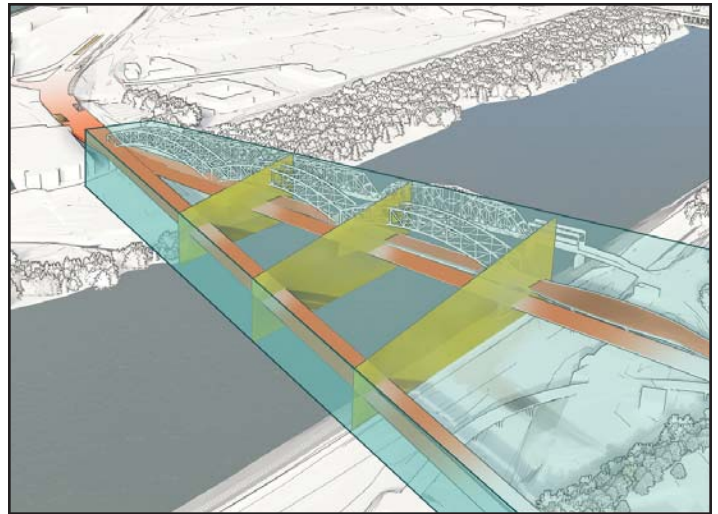
Either through DBB or DB, once the design is complete the project would be let to a contractor to build the ultimate improvement.

PROJECT PHASING

Establishing meaningful project phases and connecting them with potential funding packages will help to further the projects identified in this PEL Study. The recommendations within this study requires a phased approach because the total cost of implementing the identified strategies in each of the five geographic areas will require more funding than is currently available. MARC, and its partners, will likely have to implement these recommendations over a number of years.

As part of the PEL process, project phases have been sequenced and prioritized logically in terms of constructability and operations. These phased recommendations may change over time as conditions, needs, and priorities change. Also if funding becomes available, such as the case with the Buck O'Neil Bridge, some phases may be built earlier than currently planned.

- **Phase I: Missouri River Bridge and Interchange** — Construction funding has already been identified for either the rehabilitation or replacement of the Buck O'Neil Bridge over the Missouri River and the southern interchange with I-70, I-35, and with access into downtown Kansas City. MoDOT has already begun the environmental NEPA process to decide on the ultimate preferred strategy that is expected to be completed in 2019. The current schedule estimates that the preferred improvements in this region will be completed by 2023.
- **Phase II: Wheeler Airport Interim Interchange Improvements** — Discussions have already begun to determine whether funding can be allocated to the two interim improvements along US-169 at the Wheeler Airport. The first improvement would be at the north end of the airport to provide an additional southbound on-ramp onto US-169. The second improvement option would be to provide improved geometrics at the existing right-in right-out ramp just north of the Harlem Road interchange.
- **Phase III: West Bottom Access** — Depending on the final preferred strategy for the Missouri River Bridge, improvements to access into and out of the West Bottoms will be required to compensate for the loss of access from the Woodswether Viaduct. These improvements can either be incorporated into the preferred strategy for the bridge project or developed as a separate stand-alone project.
- **Phase IV: Mitigation Improvements** — Several improvement options outside the five geographic regions were explored as mitigation strategies to help improve various strategies along the I-70 North Loop. Some of those strategies, such as restriping lanes under Bartle Hall on I-670, have



merit on their own and should be considered as separate, stand-alone projects regardless of the final preferred strategy along I-70.

- **Phase V: Bring Route 9 to Grade** — The Study clearly recommended that strategies along Route 9 between the Heart of America Bridge and I-70 should include bringing the existing facility to grade and to reconnect Independence Boulevard all the way to Broadway.
- **Phase VI: Wheeler Airport Interchange at Harlem Road** — The interim improvements at the north end of the airport and at the right-in right-out will help in the short-term but eventually the existing Wheeler Airport interchange will need to be improved.
- **Phase VII: I-70 North Loop** - The final decision on I-70 does not have to be made immediately. The results of the ULI study confirmed that those improvements will not be necessary for 10 to 15 years. In the interim, the study recommends that the improvements identified in the access consolidation strategy be considered for implementation. Reducing the number of access points and improving safety can easily be implemented early in the process without compromising the ultimate approved configuration of I-70. Whether the recommended longer-term strategy for the North Loop is a compressed footprint or complete removal, this phase would represent the final step in the overall process outlined in this PEL study.



FHWA PEL QUESTIONNAIRE

Throughout the course of this study, the study team has been coordinating with the FHWA to ensure that the process has followed the federal guidelines for PEL documents. As part of that process, FHWA requires the study team to fill out a detailed PEL questionnaire that summarizes the PEL process and ensures the materials developed and decisions made can easily transition from the PEL Study to a NEPA study. That detailed questionnaire has been provided in Appendix A.

U.S. 169/NORTH LOOP PEL QUESTIONNAIRE

Downloaded from FHWA website on September 26, 2017

This questionnaire is intended to act as a summary of the Planning process and ease the transition from planning to a National Environmental Policy Act (NEPA) analysis. Often, there is no overlap in personnel between the planning and NEPA phases of a project, so consequently much (or all) of the history of decisions made in the planning phase is lost. Different planning processes take projects through analysis at different levels of detail. NEPA project teams may not be aware of relevant planning information and may re-do work that has already been done. This questionnaire is consistent with the 23 CFR 450 (Planning regulations) and other FHWA policy on Planning and Environmental Linkage (PEL) process.

The Planning and Environmental Linkages study (PEL Study) is used in this questionnaire as a generic term to mean any type of planning study conducted at the corridor or subarea level which is more focused than studies at the regional or system planning levels. Many states may use other terminology to define studies of this type and those are considered to have the same meaning as a PEL study.

At the inception of the PEL study, the study team should decide how the work may later be incorporated into subsequent NEPA efforts. A key consideration is whether the PEL study will meet standards established by NEPA regulations and guidance. One example is the use of terminology consistent with NEPA vocabulary (e.g. purpose and need, alternatives, affected environment, environmental consequences).

Instructions: These questions should be used as a guide throughout the planning process, not just answered near completion of the process. When a PEL study is started, this questionnaire will be given to the project team. Some of the basic questions to consider are: "What did you do?," "What didn't you do?," and "Why?". When the team submits a PEL study to FHWA for review, the completed questionnaire will be included with the submittal. FHWA will use this questionnaire to assist it in determining if the study meets the requirements of 23 CFR §§ 450.212 or 450.318. The questionnaire should be included in the planning document as an executive summary, chapter, or appendix.

1. BACKGROUND:

- A. Who is the sponsor of the PEL study? (state DOT, Local Agency, Other)

The Mid-America Regional Council (MARC), Missouri Department of Transportation (MoDOT) and City of Kansas City, Missouri (KCMO) are the project sponsors of the U.S. 169/North Loop Planning and Environmental Linkages Study (PEL Study).

- B. What is the name of the PEL study document and other identifying project information (e.g. sub-account or STIP numbers, long-range plan, or transportation improvement program years)?

The PEL Study document is the Planning and Environmental Linkages (PEL) Report for U.S. 169/North Loop Highways, which was initiated by MARC in October 2016 and is expected to be completed by May 15, 2018. PEL documents can be found online at the following address: <http://www.beyondtheloopkc.com>.

- C. Who was included on the study team (Name and title of agency representatives, consultants, etc.)?

An Executive Leadership Team (ELT), Study Management Team (SMT) and a Technical Advisory Group (TAG) were formed to discuss goals, identify study area concerns, develop concepts, and contribute in making key decisions throughout the project.

- **Executive Leadership Team** - The ELT is comprised of the leadership of each of the three project sponsors: MARC (David Warm, Executive Director and Ron Achelpohl, Transportation Manager), KCMO (Troy Shulte, City Manager and Joni Wickhan, Mayor's Office, Chief of Staff) and MoDOT (Ed Hassinger, Chief Engineer and Brian Kidwell, District Engineer).
- **Study Management Team** - The SMT is composed of representatives of the three project sponsors (Martin Rivarola, MARC Project Manager; Ron Achelpohl, MARC Transportation Manager; Wes Minder, KCMO Assistant City Manager; Russ Johnson, KCMO Study Liaison; Jade Liska, KCMO Aviation; Sherri McIntyre, KCMO Public Works Director; Kyle Elliot, KCMO Planning Department; Travis Kiefer, KCMO Parks and Recreation; Susan Barry, MoDOT District Planning Director; and Gerri Doyle, MoDOT Transportation Planner). In addition, representatives of the Kansas Department of Transportation (Mike Moriarty, Section Manager – Metro Planning; and Davonna Moore, Assistant Bureau Chief – Transportation Planning), the Unified Government of Wyandotte County/Kansas City, Kansas (Brent Thompson, Engineering Division Manager) and because these organizations have transportation assets in the Study Area. The SMT also includes members of the consultant management team from both Burns & McDonnell (Mike DeBacker, Project Director; and Ron Schikevitz, Project Manager) and Hg Consult (Steve Wells, Deputy Project Manager).
- **Technical Advisory Group** - The TAG is composed of the members of the SMT, plus MoDOT (Matt Killion, Area Engineer; Shellie Daniel, Area Engineer; Mark Sommerhauser, KC Scout; Josh Scott, District Traffic Engineer); the Kansas City Area Transportation Authority (Dick Jarrold, Director of System Development and Engineering); KCMO (Kirk Rome, Lynda Hoffman, Mike Klender, Water Department; Richard Allen, Parks and Recreation; John Debauche, Angela Ely, Bo Williams, Claude Page, Planning Department; Kerrie Tyndall, Capital Improvements Management Office; Jeff Martin and Wei Sun, Public Works; and David Long and Lezley Mix, Aviation); KC Streetcar Authority (Tom Gerend, General Manager); KC Port Authority (Richard Grenville); Federal Highway Administration (Raegan Ball, NEPA Coordinator); Clay County (______); Jackson County (______); and Platte County (______); North Kansas City, Missouri (Sara Copeland, Community Development Director)

Consultant Team - Burns & McDonnell was the lead consultant for the PEL Study. Hg Consult, Confluence, Cambridge Systematics, Wilson & Company, Garver, HR&A Advisors, Architectural & Historical Research, Shipley Communications, and Single Wing Creative were also part of the Consultant team.

- D. Provide a description of the existing transportation facility within the corridor, including project limits, modes, functional classification, number of lanes, shoulder width, access control and type of surrounding environment (urban vs. rural, residential vs. commercial, etc.)

The PEL Study focuses on development of a strategic plan that identifies and evaluates reasonable strategies for the approximately 2.5-mile segment of US-169

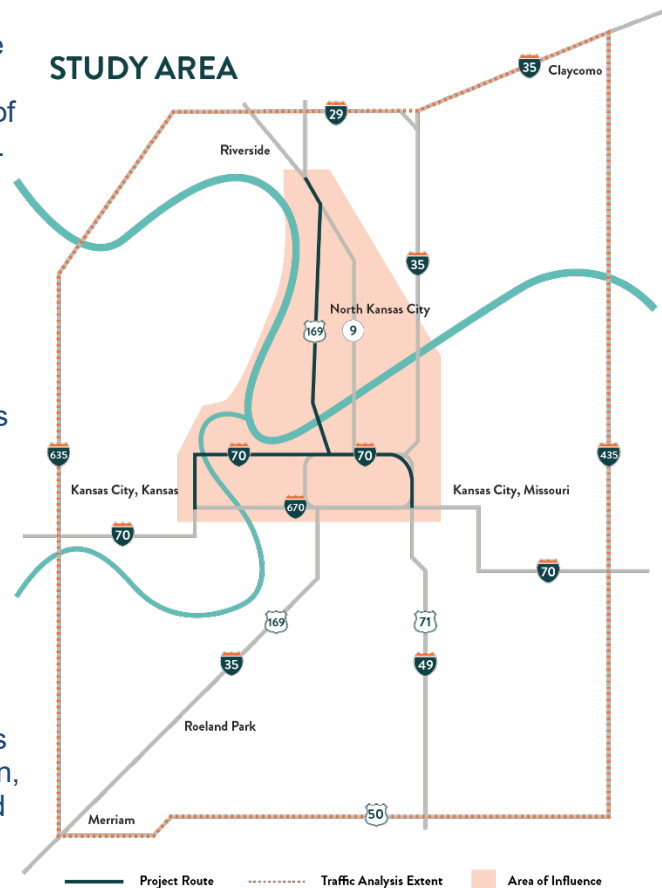
extending south from a point north of the Downtown Wheeler Airport that includes the Buck O'Neil Bridge crossing of the Missouri River, the airport access interchange, and connections with I-70 at 5th and 6th Street in downtown Kansas City. The Study also focuses on the downtown Kansas City freeway system which circumnavigates the periphery of the CBD. Particular emphasis was placed on the evaluation of the 1-mile northern segment of the system referred to as the North Loop. The PEL study evaluated long term potential impacts that could result to regional transportation, land use, and quality of life under possible combined scenarios that revise US 169 and the North Loop in the study area.

The general surrounding environment is highly urbanized particularly on the south side, with a mixture of residential and commercial development in the River Market on the north side. Route 9 which bisects the North Loop near the east end, separates the River Market from the Columbus Park predominantly residential community.

Along the North Loop, I-70 is jointly designated as I-35, and is an urban, barrier-separated freeway carrying three basic through lanes in each direction between interchanges with I-35 at both ends. A series of densely spaced interchanges provide access to the River Market and CBD. A system-to-system interchange with Route 9 provides direct freeway connection to I-70. Interchange spacing and associated auxiliary lane length limits weave and merge distances are significantly less than current AASHTO and MoDOT design standards. Outside shoulder widths along I-70 marginally meet standards with 6-foot inside shoulders.

US 169 is a barrier separated, four-lane limited access urban expressway. The northbound lane is curbed at the edge of the outside drive lane, with no shoulder. The southbound lane is barrier separated from the access and circulation road that serves the Downtown Wheeler Airport, with a 12-foot shoulder between the barrier and drive lane. A left-exit / left-entrance interchange near the north approach to the US 169 Buck O'Neil Bridge provides access to the airport on the west side and the Harlem area to the east of US 169. Safety and operational issues prevail due to the lack of acceleration lane at the left-side southbound on-ramp to the expressway and the bridge, and result in regularly occurring congestion and a high crash rate.

Aside from roadway, other travel modes within the Study Area include pedestrian, bicycle, heavy freight rail, streetcar, and air service. The existing Buck O'Neil Bridge has limited pedestrian facilities, and no bicycle provisions.



- E. Provide a brief chronology of the planning activities (PEL study) including the year(s) the studies were completed.

Relevant previous studies include:

- **MARC, 2040 Citywide EMME Travel Demand Model (2017)**
- **MARC, Dynameq, Dynamic Traffic Analysis (2017)**

- F. Are there recent, current, or near future planning studies or projects in the vicinity? What is the relationship of this project to those studies/projects?

Recent, current, or near future planning studies or projects in the vicinity include:

- **MoDOT and FHWA, Interstate 29/35 Paseo Bridge Corridor Final EIS (2006)** – This study was used for supplementing identification of environmental resources in the study area, it's traffic simulation model, and identification of alternatives.
- **MARC, Natural Resources Inventory (2017)** – Provided information on priority conservation and preservation areas within the Study Area.
- **MoDOT, Conceptual Study and Rehabilitation Report, Bridge A4646 and A4649, US. Route 169 Buck O'Neil Bridge over the Missouri River (2017)** – Provided analysis on poor condition of major river bridge within Study Area.
- **MARC, Outlook 2040 (2015, as amended)**
- **KCMO, Bike KC Plan Update (2017)**
- **KCMO, Greater Kansas City Regional Bikeway Plan (2015)**
- **KCMO, Walkability Plan (2003)**
- **KCATA, Transit Initiatives (2017)**
- **Kansas City Streetcar Authority, KC Streetcar Riverfront Extension Feasibility Study (2017)**
- **Urban Land Institute (ULI), Kansas City North Loop (2016)** – Two-day workshop by local ULI Chapter that examined the decommissioning, demolition, and redevelopment of the I-70 North Loop
- **ULI, Kansas City North Loop (2017)** – Week long workshop by National ULI group that examined previous ULI study along with strategies for improving transportation and land use in the North Loop plus the surrounding Downtown, River Market, Columbus Park and Crossroads Arts District neighborhoods.
- **NKC, Burlington Corridor Complete Street Plan (2016)** – Outlined future plans for Route 9 through North Kansas City, Missouri.
- **NKC, North Kansas City Master Plan (2016)**
- **KCMO, Kansas City Regional Aviation System Plan (2015)** – Outlined plans for Downtown Airport.
- **KCMO, Northrail Streetcar Study (2014)**
- **KCMO, Nextrail-KC Streetcar Expansion System Overview (2013)**

- **KCATA, *Third and Grand Transportation Hub Area Plan* (2013)**
- **KDOT, *Lewis and Clark Concept Study* (2012)**
- **KCMO, *Sidewalk and Trail Master Plan* (2012)**
- **FHWA and MoDOT, *Future of I-70: Second Tier EIS* (2012)**
- **ULI Rose Center for Public Leadership, *Redeveloping the West Bottoms* (2012)**
- **KCMO, *Greater Downtown Area Plan* (2010)**
- **_____, *South Loop Link* (2009)**
- **NKC, *Burlington Corridor Study* (2009)**
- **MARC, *Kansas City Regional Freight Outlook* (2009)**
- **UG, *Unified Government Citywide Master Plan* (2008)**
- **UG, *Unified Government Downtown Master Plan* (2007)**
- **KCMO, *Second Street Infrastructure and Development Plan* (2005)**

Transportation projects in or near the Study Area include:

- **Reconstruction of the Grand Avenue Bridge over I-670 (completed 2015)**
- **KDOT Lewis & Clark Viaduct Reconstruction (2020)**
- **US 169 Missouri River Bridge short-term rehabilitation (Summer 2018)**

2. METHODOLOGY USED:

A. What was the scope of the PEL study and the reason for completing it?

MARC identified the scope for the project in a Request for Proposal dated February 26, 2016, to complete a PEL to position MARC and its partners for future work to finalize NEPA documentation for segments of independent utility within the Study Area. The PEL was to focus on development of a strategic plan that identified and evaluated reasonable alternatives for the U.S. 169 corridor, including access connections to the Downtown Airport, replacement or reuse of the Broadway Extension Bridge, and the connection to the 5th/6th Street interchange. The study was to also focus on the I-70 corridor, including its connection to the U.S. 169 corridor and the downtown loop, improvement of traffic flow and better connection of the street grid between River Market and downtown Kansas City. Additional issues to be considered included: access to the Port of Kansas City, airspace around the Downtown Airport, Missouri River Navigation, bicycle and pedestrian accommodations on major bridges, impacts to transit and railroads, recommendations and plans from KDOT's Lewis and Clark Viaduct Study and potential downtown interstate routing, including on I-35.

B. Did you use NEPA-like language? Why or why not?

Yes, a NEPA-like process was intentionally used such that as funding becomes available for construction, the project can progress directly into a NEPA process. NEPA language was used throughout the process and in the study documents.

C. What were the actual terms used and how did you define them? (Provide examples or

list)

The following list of terms and definitions were used in the PEL Study:

Study Area – The study area is generally defined by the US-169/MO Route 9 interchange to the north, I-670 to the south, the I-70/670 interchange in Wyandotte County, Kansas, to the west, and the I-70/I-670/US-71 interchange in Jackson County, Missouri to the east. The study area is depicted in Figure 1, above.

Purpose and Need – The purpose and need statement was derived from a process of problem identification and solution generation through stakeholder/public participation. Public participation was an important part of the process.

Strategies – A universe of alternatives was developed that included a number of Build Alternatives and the No Action Alternative. The No Action Alternative reflects a scenario should MARC and its partners select to not build any further improvements than those already planned for construction (i.e., KDOT Reconstruction of Lewis & Clark Viaduct and MoDOT replacement or rehabilitation of the Broadway/Buck O'Neil Missouri River Bridge).

Segment of Independent Utility – As part of project phasing, the strategies will be broken into segments of independent utility which requires that each project designed and constructed can stand alone and, if no other projects or phases are completed, can serve a distinct purpose or function.

Screening Process – This term is used to describe the evaluation of alternatives that leads to the selection of appropriate strategies to move forward for further study and ultimately to a recommended alternative. A two-step evaluation process was used for this PEL study.

Recommended Alternative Strategies – This term refers to the ultimate and recommended solutions based on the screening process that will advance into the NEPA process and further design.

Affected Environment – This term refers to the baseline conditions for community and environmental resources in the study area.

Environmental Justice – The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations and policies. Executive Order (EO) 12898 issued by President Clinton mandates that Federal agencies achieve environmental justice. Environmental Justice was a criteria evaluated during the Level 1 and Level 2 alternative screenings.

Minority Population – Any readily identifiable groups of minority persons who live in a geographic proximity, and if circumstances warrant, geographically dispersed/transient persons who will be similarly affected by a proposed FHWA program, policy, and activity. A minority is a person who is Black, Hispanic, Asian American/Pacific Islander, or American Indian/Alaskan Native.

Low-income Population – Any readily identifiable groups of low-income persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons who will be similarly affected by a proposed FHWA program, policy, and activity.

Major Traffic Generators – Facilities within or near the study area that generate large volumes of traffic on a daily basis.

Intermodal – Multiple transportation modes with a high degree of connectivity and interchange between the modes. From a passenger perspective, transportation modes include car, bicycle, bus, train and on foot. From a freight perspective, modes include rail, truck, airplane and boat.

Other NEPA Terms – Various other NEPA regulatory terms were used, including: Executive Order (EO) 11988 – Floodplain Management; National Flood Insurance Program (NFIP); Section 408 of the Clean Water Act (CWA); Section 14 of the River and Harbors Act of 1899; the Missouri and Kansas CWA 303(d) Impaired Waters lists; the Missouri and Kansas Surface Water Body Classifications; Section 404 of the CWA; National Wetland Inventory (NWI); EO 11990 – Protection of Wetlands; National Register of Historic Places (NRHP); Potential or Recognized Hazardous Materials Sites; U.S. Endangered Species Act (ESA); Missouri Department of Conservation (MDC) Natural Heritage Database; MDC Fish and Wildlife System; the Kansas Department of Wildlife, Parks & Tourism (KDWP&T) Threatened and Endangered Species List; the U.S. Fish & Wildlife Service (USFWS) Information Planning and Conservation System (IPaC); Section 4(f) of the Department of Transportation (DOT) Act of 1966; Section 6(f) of the Land and Water Conservation Fund (LWCF) of 1965; FHWA Noise Standard; MoDOT Noise Policy; KDOT Noise Policy; Clean Air Act (CAA) National Ambient Air Quality Standards (NAAQS).

D. How do you see these terms being used in NEPA documents?

The terms used in the PEL Study are similar to other NEPA documents produced for MARC, its partners and FHWA in the state of Missouri. It is anticipated that the same terms will be used in the same manner throughout the NEPA study.

E. What were the key steps and coordination points in the PEL decision-making process? Who were the decision-makers and who else participated in those key steps? For example, for the corridor vision, the decision was made by state DOT and the local agency, with buy-in from FHWA, the USACE, and USFWS and other resource/regulatory agencies.

The project team received concurrence from FHWA for key steps and coordination points in the PEL decision-making process:

- Purpose and Need – June 2017
- Reasonable Strategies Evaluation – March 2018

The Resource Agencies (USACE, USCG, USFWS, USEPA, KS and MO USDA/NRCS, USDHS/FEMA, FAA, MDC, USDOJ/NPS, MDNR, MO SEMA, KDWP&T, KHS/SHPO and KDHE) as well as a number of Native American tribes were invited to participate in the PEL process in a letter dated January 27, 2017. In addition, these agencies and tribes were invited to attend an agency scoping meeting held at MARC on February 28, 2017. At the meeting the agencies and tribes were provided with an overview of the PEL Study along with preliminary findings of existing environmental conditions within the Study Area. Verbal comments were received at the agency scoping meeting from: USACE, KDWP&T, FAA, USCG and the Miami Tribe of Oklahoma. Follow-up written comments were also received from: KS USDA/NRCS, KDWP&T, USEPA, MO SHPO, FAA, MDNR, Miami Tribe of Oklahoma, USACE and the MO Federal Agency Clearinghouse.

In addition, several meetings have been conducted with the SMT, TAG, Stakeholders, and the public for the PEL Study, which included:

- SMT meetings including MoDOT and KDOT
- 8 TAG meetings with FHWA and Stakeholders
- 4 public meetings were held
- 47 Other outreach meetings held with stakeholders

FHWA and MoDOT are the final decision makers for the PEL study with input from the above listed participants.

F. How should the PEL information be presented in NEPA?

The PEL information will be summarized in the *Planning and Environmental Linkages (PEL) Report for the U.S. Highway 169/Interstate 70 North Loop (Beyond the Loop)* (PEL Report) and should be used as the starting point for the NEPA process. Coordination with the same agencies in the PEL Study should continue into NEPA, with additional ones added based on resources reviewed.

If it is determined that a Categorical Exclusion (CE) is the correct NEPA document with which to move forward, then the concept screening, environmental resource information, and agency and public involvement information can be directly referenced in the CE. If an Environmental Assessment (EA) or Environmental Impact Statement (EIS) is determined as the appropriate NEPA process with which to move forward, then the PEL information can be used to develop the purpose and need section of the EA or EIS and can be the basis for more in-depth evaluation of the remaining concepts carried into NEPA and expanding on the environmental resources and associated impacts. The next steps are documented in Chapter 8 of the PEL Report.

3. **AGENCY COORDINATION:**

A. Provide a synopsis of coordination with Federal, tribal, state and local environmental, regulatory and resource agencies. Describe their level of participation and how you coordinated with them.

Agency meetings have been conducted with MARC, MoDOT, FHWA, Stakeholders, resource agencies, and the public for the PEL Study, which included:

- 10 SMT meetings
- 8 TAG meetings
- Agency coordination through a mailing and scoping meeting

The SMT was composed of representatives from the following agencies:

- MARC
- KCMO
- MoDOT
- UG
- KDOT

The TAG was composed of representatives from the following agencies:

- MARC
- FHWA

- KCMO
- MoDOT
- UG
- KDOT
- NKC
- KCATA
- KCSA
- PORT KC
- Clay County
- Jackson County
- Platte County

The Resource Agencies (USACE, USCG, USFWS, USEPA, KS and MO USDA/NRCS, USDHS/FEMA, FAA, MDC, USDOJ/NPS, MDNR, MO SEMA, KDWP&T, KHS/SHPO and KDHE) as well as a number of Native American tribes were invited to participate in the PEL process in a letter dated January 27, 2017. In addition, these agencies and tribes were invited to attend an agency scoping meeting held at MARC on February 28, 2017. At the meeting the agencies and tribes were provided with an overview of the PEL Study along with preliminary findings of existing environmental conditions within the Study Area. Verbal comments were received at the agency scoping meeting from: USACE, KDWP&T, FAA, USCG and the Miami Tribe of Oklahoma. Follow-up written comments were also received from: KS USDA/NRCS, KDWP&T, USEPA, MO SHPO, FAA, MDNR, Miami Tribe of Oklahoma, USACE and the MO Federal Agency Clearinghouse.

- B. What transportation agencies (e.g. for adjacent jurisdictions) did you coordinate with or were involved during the PEL study?

A number of agencies were a part of the SMT and TAG for this study, including MARC, FHWA, MoDOT, KDOT, KCMO, UG, NKC, KCATA, KCSA, PORT KC, Jackson County, Platte County, and Clay County. For a summary of the Stakeholders, see Chapter 4 of the PEL Report.

- C. What steps will need to be taken with each agency during NEPA scoping?

A scoping meeting, a series of smaller scoping meetings, or similar level of outreach will need to be held with each transportation and resource agency to inform these agencies of the findings of the PEL Study and to discuss the NEPA process for the project.

Information obtained and evaluated during the PEL Study process will be used to conduct the NEPA process and provide further and expanded evaluation of environmental resources. The agencies will be consulted during the scoping process to determine any concerns or obtain any additional information identified since the PEL Study.

4. PUBLIC COORDINATION:

- A. Provide a synopsis of your coordination efforts with the public and stakeholders.

Extensive public outreach informed every step of the PEL process. The project team developed and deployed a proactive plan and process to identify and engage the affected public, stakeholders, and resource agencies to encourage meaningful input at milestone points in the PEL process.

A wide variety of opportunities for interested parties to become involved were deployed, and the process was transparent and effective. The plan was consistent with the strategies and goals documented in MARC's Public Participation Plan (PPP).

Outreach efforts included:

- 1) **Technical Advisory Group** - Coordination with a Technical Advisory Group (TAG) which served as the primary means of agency coordination for the PEL Study. The TAG included local, state, federal and tribal staff to provide technical input and expertise throughout the study. The TAG was called upon to participate in public meetings. TAG meetings may also include representatives from local businesses, environmental advocacy groups and representatives from major regional institutions. Letters will be prepared and sent inviting local, state, tribal and federal agency participation and seeking feedback throughout the PEL process.
- 2) **Project Stakeholders** - Engagement with a Stakeholder Advisory Group (SAG), comprised of local individuals who bring unique knowledge and skills complementing those of the TAG. The SAG's role was to make recommendations and/or provide key information and materials to the Study Team.
- 3) **Public Meetings** – Meetings were held in conjunction with key project goals such as the development of the purpose and need and transportation goals and objectives. The Public meetings were also utilized to obtain input and feedback on the alternatives analysis methodology and development of alternatives. Thousands of stakeholders were engaged as part of the PEL process.
- 4) **Urban Land Institute** - Coordinating with the Urban Land Institute (ULI) as part of a national Technical Advisory Panel (TAP). The PEL team reached out to the ULI to provide national expertise to engage with local stakeholders as part of the planning process. Public input was analyzed and gathered as part of the TAP. Interviews with 90 stakeholders were conducted as part of the ULI activity.
- 5) **Social Media** - A study-specific website was created and reside at www.beyondtheloppkc.com communicate project information and public involvement activities throughout the PEL process. The project email address will be listed on the website and all outreach materials. The public utilized the website to provide feedback via surveys hosted and promoted on the website.
- 6) **Other Tools** - Other outreach tools and events such small group and agency coordination meetings/briefings will be prepared and conducted throughout the duration of the PEL Study. The study team held monthly meetings with the neighborhood presidents and industrial area representatives throughout the planning process.
- 7) **A Visioning/Scenario Planning Workshop** was conducted to obtain early feedback and develop a foundation for continued community outreach. The workshop informed the development of Purpose and Need. Stakeholders will have the opportunity to incorporate their ideas and priorities for the study corridor. The workshop focused on what the community wanted for the corridor in 60 years.
- 8) As the PEL Study progressed, the project partners and public had the opportunity to review the following four PEL milestones during public meetings:

purpose and need, alternatives screening methodology, PEL recommendations, and final PEL report.

All TAG, SMT, workshops and charrettes were open to the general public and allowed for full and meaningful participation for anyone in attendance regardless of knowledge or ability level. All meetings were well publicized and information about the project and process will be distributed to the media in an effort to keep the general public informed. Additionally, community organizations responded to requests for dozens of presentations from the project team. The mobile-friendly ADA compliant project website was deployed to provide access and further public participation.

For a summary of the Stakeholder and public involvement process, see Chapter 4 of the PEL Report.

5. PURPOSE AND NEED FOR THE PEL STUDY:

A. What was the scope of the PEL study and the reason for completing it?

MARC identified the scope for the project in a Request for Proposal dated February 26, 2016, to complete a PEL to position MARC and its partners for future work to finalize NEPA documentation for segments of independent utility within the Study Area. The PEL was to focus on development of a strategic plan that identified and evaluated reasonable alternatives for the U.S. 169 corridor, including access connections to the Downtown Airport, replacement or reuse of the Broadway Extension Bridge, and the connection to the 5th/6th Street interchange. The study was to also focus on the I-70 corridor, including its connection to the U.S. 169 corridor and the downtown loop, improvement of traffic flow and better connection of the street grid between River Market and downtown Kansas City. Additional issues to be considered included: access to the Port of Kansas City, airspace around the Downtown Airport, Missouri River Navigation, bicycle and pedestrian accommodations on major bridges, impacts to transit and railroads, recommendations and plans from KDOT's Lewis and Clark Viaduct Study and potential downtown interstate routing, including on I-35.

B. Provide the purpose and need statement, or the corridor vision and transportation goals and objectives to realize that vision.

Chapter 1 of the PEL Report includes the purpose and need statement and the goals as follows:

Study Purpose - The study purpose was to seek the most effective approach to improving the transportation facilities within the Study Area, including the development of alternative strategies, which, when implemented, will meet the identified current and future needs while balancing the interests of the various stakeholders.

Study Needs - Within the context of the overarching study goals, the PEL process included the development of specific study needs that included:

- Improve Physical Conditions
- Optimize System Performance
- Improve Safety and Security

Study Goals - Additional study goals identified included:

- Improve Transportation Choices

- Improve Economic Vitality and Placemaking
- Improve Sustainability

C. What steps will need to be taken during the NEPA process to make this a project-level purpose and need statement?

The Beyond the Loop PEL Study purpose and need was a collaborative effort that integrated public involvement and agency coordination in its development. Detailed technical information was provided with regard to population trends and projections, major traffic generators, historic and future traffic projections, and roadway design and safety conditions, all of which support the purpose and need for improvements within the study area. To develop project-level purpose and need statements during the NEPA process, it will be necessary to utilize the purpose and need statement developed during the Beyond the Loop PEL Study as a starting point and customize it for each specific project. This will be necessary because the Beyond the Loop PEL Study was not developed for a specific corridor or project but as a master plan of transportation solutions. It is anticipated that further environmental data collection and analysis of project-specific conditions will be necessary for the development of the project-specific purpose and need.

6. **RANGE OF ALTERNATIVES:** Planning teams need to be cautious during the alternative screen process; alternative screening should focus on purpose and need/corridor vision, fatal flaw analysis, and possibly mode selection. This may help minimize problems during discussions with resource agencies. Alternatives that have fatal flaws or do not meet the purpose and need/corridor vision will not be considered reasonable alternatives, even if they reduce impacts to a particular resource. Detail the range of alternatives considered, screening criteria, and screening process, including:

A. What types of alternatives were looked at? (Provide a one or two sentence summary and reference document.)

The alternative strategies development and screening process began with the identification of 32 conceptual strategies. These strategies included a broad range of ideas and improvements focusing on the No Build alternative, Build and Transportation System Management (TSM) strategies in four subareas. These strategies were the subject of a Level 1 screening and then refined in a Level 2 screening evaluation that resulted in the identification of five subareas and 14 refined strategies. Again, these strategies included the No Build alternative, Build and TSM strategies. These strategies are defined and graphically represented in Chapters 6 and 7 of the Beyond the Loop PEL Study along with an explanation of the screening process and screening criteria.

B. How did you select the screening criteria and screening process?

Several meetings were held with the SMT and TAG to develop the purpose and need for the project, determine the project goals, and provide input on screening criteria/process. Those goals and input led to the development of screening criteria for the two-tier screening process with the first screening based on meeting the purpose and need, existing environmental conditions, as well as public outreach and engagement. The Level 2 screening was based on meeting the purpose and need, additional transportation conditions (e.g., traffic modeling data), potential environmental impacts, and stakeholder/public input to arrive at a refined set of strategies for each subarea.

Documenting the elimination of alternative concepts was a critical part of the process to

avoid the need to further consider an alternative strategy during the future NEPA process once it has been eliminated and focus on the Recommended Alternative Strategies and those Not Recommended.

Chapters 5, 6 and 7 of the PEL Report provide a summary of the process and results.

- C. For alternative(s) that were screened out, briefly summarize the reasons for eliminating the alternative(s). (During the initial screenings, this generally will focus on fatal flaws.)

During the Tier 1 screening, the initial conceptual strategies were compared and measured against the project purpose and need as well as goals. This initial analysis considered and applied data obtained from a variety of sources, including MoDOT traffic and safety evaluations, MARC and KCMO traffic models, input from the TAG, and information obtained from other federal, state and local agencies. Concepts that met the purpose and need as well as goals were retained for further evaluation in the Tier 2 screening.

During the Tier 2 screening the remaining initial conceptual strategies were evaluated using refined quantitative and qualitative criteria developed from the project purpose and need as well as goals. Initial strategies that met refined purpose and need as well as goals criteria were retained and proposed to move forward into NEPA.

Chapters 5, 6 and 7 of the PEL Report provide a summary of how the alternatives were screened out.

- D. Which alternatives should be brought forward into NEPA and why?

The large study area of 7 mi² includes approximately four miles of I-70 and 3.5 miles of US-169, as well as two major rivers, an airport, a downtown business district, and several major industrial areas, plus neighborhoods and parks. For analytical purposes, five relatively distinct subareas are easily identifiable, as indicated in the Figure to the right. These are:

Missouri River Bridge: US-169 from the north bank of the Missouri River to I-35/I-70 at the northwest corner of the Kansas City, MO downtown central business district (CBD).

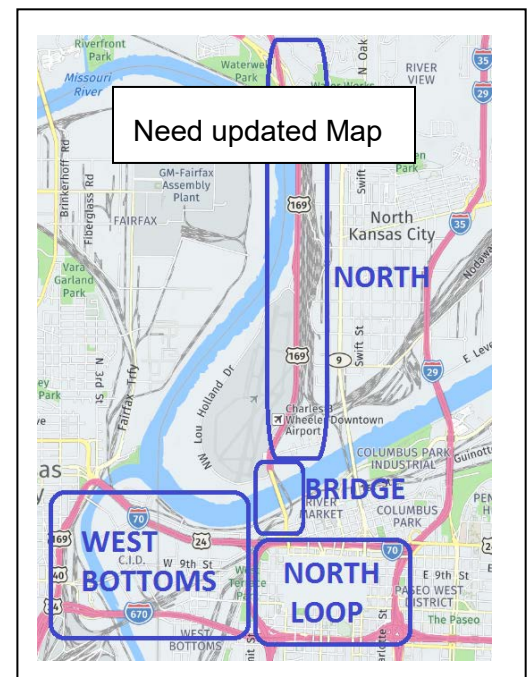
I-70 North Loop: The $\frac{3}{4}$ mile section of I-70 from the northeast corner of the CBD to the northwest corner.

Downtown Wheeler Airport: US-169 from just north of the Downtown Wheeler Airport to the north bank of the Missouri River.

West Bottoms: I-70 from US-169 to the Kansas River.

Missouri Route 9: The $\frac{1}{2}$ mile section of Missouri Route 9 from the Heart of America Bridge to Admiral Boulevard.

A set of preferred strategies was identified for each of these subareas to be brought into NEPA and are summarized in the tables below with more details provided in Chapters 7



and 8 of the PEL Study. It was determined that these preferred strategies would meet the purpose and need as well as goals of the PEL Study.

Table - Missouri River Bridge and Interchange Strategies Summary

Missouri River Bridge and Interchange	Strategy	Description
Rehabilitate the Existing O'Neil Bridge (No-Build Condition)	A1	Rehabilitation of the existing bridge as currently programmed would consist of a \$50 million project and would restore the structure to satisfactory physical condition, and would extend the expected life of the bridge an additional 35 years
Western Alignment	A2	Approximate 28-degree skew to perpendicular with river. Most direct connection to I-35.
Central Alignment	A3	Approximate 21-degree skew to perpendicular with river. Centrally located between the existing bridge and I-35 at the west side of the loop.
Adjacent Alignment	A4	Approximate 10-degree skew to perpendicular with river. Location just upstream of existing bridge. Requires reconfiguration of existing Broadway interchange.
Broadway Direct Connection	AB1	US-169 uses its existing alignment, tying US-169 into the Broadway intersection at 5th Street/Independence Avenue.
Hybrid Interchange	AB2	US-169 uses its existing alignment, tying US-169 into the Broadway intersection at 5th Street/Independence Avenue plus a direct flyover ramp to and from I-35.
I-35 Direct / 4th Street Interchange	AB3	US-169 connects to I-35 on the west side of the loop using an elevated roadway crossing over 4th Street, 5th Street and I-70 with local access connections at 4 th Street.
I-35 Direct / 5th and 6th Street Interchange	AB4	US-169 connects to I-35 on the west side of the loop using an elevated roadway crossing over 4 th Street, 5 th Street and I-70 with local access via 5 th and 6 th Streets.

Table – I-70 North Loop Strategies Summary

I-70 North Loop	Strategy	Description
Access Consolidation	B1	Removes some ramps and eliminates the direct connection between MO Route 9 and I-70.
Compressed Footprint South Strategy	B3-6a	Compressed I-70 along South Side of Corridor, returns existing ROW to commercial/recreational use, Independence Avenue converted to an arterial roadway, consolidate interstate highway access
Compressed Footprint North Strategy	B3-6b	Compressed I-70 along North Side of Corridor, returns existing ROW to commercial/recreational use, Independence Avenue converted to an arterial roadway, consolidate interstate highway access
Compressed Footprint Existing Strategy	B3-7	Compressed I-70 along existing location, returns existing ROW to commercial/recreational use, Independence Avenue converted to an arterial roadway, consolidate interstate highway access
Independence Ave	B7-1	Independence Avenue converted to an arterial roadway, 6th Street two-way between Broadway and Charlotte.

Table – Wheeler Airport Strategies Summary

Wheeler Airport	Strategy	Description
Half Diamond Interchange with Existing Harlem Road Access	C1	A half diamond interchange, with the exit and entrance ramps on the right-hand side.
Half Diamond Interchange with Split Lou Holland Undercrossing	C4	Similar to strategy C1 except Northbound Lou Holland Drive splits near the floodwall and provided direct connection to Northbound US-169 and Richards Road via a weaving movement.
Half Diamond Interchange with New Single Harlem Road Railroad Crossing	C5	A half diamond interchange, with the exit and entrance ramps on the right-hand side. Harlem Eastbound and Westbound traffic is brought together for a Single railroad undercrossing.
<i>Auxiliary Improvements</i>		
Right-In/Right-Out At-Grade Improvements	C-RIRO	Improve existing RIRO by providing additional length to existing accel/decel lanes and separated accel/decel lanes
Interchange Improvements at Richards Road (North)	C-NI	SB entrance and exit ramp connections and NB Entrance ramp Connections

Table – West Bottoms Strategies Summary

West Bottoms	Strategy	Description
Mulberry St to Forrester Rd	D6	Utilize existing Mulberry St between Woodswether and Forrester
Wyoming St to Forrester Rd	D7	Utilize existing Wyoming St between Woodswether and Forrester
4 th St to Woodswether Bridge	D8	Extend 4 th Street west across the railroad on a new bridge to into Woodswether Road.

Table - Missouri Route 9 Strategies Summary

Missouri Route 9	Strategy	Description
All At-grade Crossings on Existing Alignment	E2a	MO- 9 brought back to grade with at-grade crossings at 3 rd Street, 5 th Street, Independence Avenue, and 6 th Street. No shift in MO-9 alignment
All at-grade Crossings on Western Alignment	E2b	MO-9 brought back to grade with at-grade crossings at 3 rd Street, 5 th Street, Independence Avenue, and 6 th Street. Route 9 alignment shifted west.
South At-Grade Connections	E3	I-70/MO-9 interchange removed and replace with at-grade intersections at Independence Avenue and 6 th Street
South At-Grade Connections / Split Lanes	E4	I-70/MO-9 interchange removed. Northbound and southbound MO-9 split with each having at-grade intersections at Independence Avenue and 6 th Street

- E. Did the public, stakeholders, and agencies have an opportunity to comment during this process?

Yes, thousands of members of the public were involved in the PEL process both in person and online. Their comments were well documented and the input impacted the study directly.

- 1) Input from the Visioning kick-off meeting was used to shape the projects Purpose and Need statements.
- 2) Input from the Initial Alternative Review public meeting and online survey was used to gather public sentiment on a large array of alternatives and narrow down

those alternatives. The narrowed list of alternatives was then modeled, and the model results were reviewed by the SMT, TAG and key government stakeholders.

- 3) A series of charrettes were then held to present the results of traffic modeling and alternative refinement to the public and gather feedback.
- 4) Finally, the final PEL was presented to the public for input and confirmation.

F. Were there unresolved issues with the public, stakeholders, and/or agencies?

The alternatives documented in the PEL represent both technical analysis and public sentiment. There are additional issues that will require further examination as part of the NEPA process, but no specific unresolved issues as part of the public participation process. Specifically, impacts on freight movement, due to some of the North Loop alternatives, to the industrial areas in the study area will need to be examined further.

7. PLANNING ASSUMPTIONS AND ANALYTICAL METHODS:

A. What is the forecast year used in the PEL study?

The forecast year used in the PEL Study was 2040.

B. What method was used for forecasting traffic volumes?

The *Beyond the Loop Traffic Report for the PEL, March 2018*, documents the methodology for the traffic forecasts.

MARC, Kansas City's MPO, has built and maintains an EMME travel demand model with limits that include four Missouri counties and four Kansas counties in the Kansas City metropolitan area. Missouri counties include: Platte, Clay, Jackson, and Cass. Kansas counties include: Leavenworth, Wyandotte, Johnson, and Miami.

EMME model output was used as seed information for input into a Dynamic Travel Demand (DTA) traffic model which was built for this study and is centered within the EMME model limits. The DTA is generally defined as being within the borders of I-435 to the east, I-435 to the west, I-29/I-35 to the north, and Shawnee Mission Parkway/Volker Boulevard to the south.

The area of influence, referred to as the study area, is generally defined as being bordered by the US-169/MO Route 9 interchange to the north, I-670 to the south, the I-70/I-670 interchange in Wyandotte County, Kansas to the west, and the I-70/I-670 interchange in Jackson County, Missouri, to the east. The PEL study focuses on development of a strategic plan that identifies and evaluates reasonable alternatives for the US-169 corridor, including access connections to the Downtown Kansas City, Missouri area.

Measures of effectiveness (MOE's) were collected from the 2040 DTA models and were organized as follows:

1. AM and PM conditions
2. Freeways, ramps, arterials and all roadways combined
3. No-Build conditions and the three Build DTA scenario models

Specifically, in addition to traffic volumes, speeds and queues, the following model information was collected:

- Vehicle Miles Traveled (VMT)

- Vehicle Hours Traveled (VHT)
- Vehicle Hours of Delay (VHD)

These MOE's were used to measure strategy comparisons between Baseline 2016 conditions and No Build 2040 conditions along with the Build scenarios during both 2016 and 2040 conditions. These comparisons were both tabular and graphic comparisons of the systemwide MOE's and the MOE's from only the roadway network in the immediate vicinity of the Kansas City Downtown area.

Finally, resulting reductions to overall congestion was conservatively projected for 2040 conditions due to automated vehicle and connected vehicle efficiencies that are expected to be realized.

- C. Are the planning assumptions and the corridor vision/purpose and need statement consistent with each other and with the long-range transportation plan? Are the assumptions still valid?

Yes. The Beyond the Loop PEL Study purpose and need statement is consistent with and supports the goals from the Regional Transportation Plan ((RTP) (MARC's Transportation Outlook 2040)). The consistency of the Beyond the Loop PEL with the RTP is discussed in Chapter 1 of the PEL Study and summarized below

- D. What were the future year policy and/or data assumptions used in the transportation planning process related to land use, economic development, transportation costs, and network expansion?

Future land use characteristics, including household and employment data, were reviewed. Information included in our assumptions is outlined below:

For transportation planning purposes, MARC has divided the entire metropolitan region into Transportation Analysis Zones (TAZ). MARC estimates socioeconomic variables, including population, household, employment, and income, for each TAZ and project through 2040 for local and regional planning purposes. MARC incorporates many variables in their estimates and projections, including, but not limited to, overall regional growth, each jurisdiction's potential share of future growth, and current and long-range

8. **ENVIRONMENTAL RESOURCES** (wetlands, cultural, etc.) reviewed. For each resource or group of resources reviewed, provide the following:

- A. In the PEL study, at what level of detail was the resource reviewed and what was the method of review?

The environmental resources studied were selected based on the characteristics of the study area, previous reports, and Stakeholder input. The resources that were considered are generally consistent with NEPA, its implementing regulations, and FHWA and MoDOT NEPA guidelines. Existing resources present in the study area have been identified and documented in Chapter 3 of the PEL Study and are consistent with a planning level study. Resources were reviewed based on existing datasets, studies and plans. A brief summary is provided below:

- **Socioeconomic Factors** – Total, minority, low-income, aged population data, as well as employment and income data were obtained and reviewed at the tract level from the U.S. Census Bureau 2000 Census, 2010 Census, American Community Survey data for 2015 and 2011-2015 five-year estimates and MARC population projections. The Executive Order on Environmental Justice was discussed and

populations were identified.

- **Floodways and Floodplains** – The Federal Emergency Management Agency (FEMA) National Flood Hazard Layer in ArcGIS was reviewed to identify regulatory floodways and 100-year floodplains. The Executive Order regarding Floodplain Management as well as FHWA policies and procedures were discussed along with state permitting requirement for floodplain development. In addition flood protection levees were identified from information obtained from the Missouri and Associated Rivers Coalition website and associated mapping data. Regulations applicable to levees were also discussed.
- **Water Quality** – The Kansas Department of Health and Environment (KDHE) Water Body Classification webpage; the Missouri Department of Natural Resources (MDNR) Missouri Water Quality, Water Body Classification webpage; and correspondence from the MDNR were reviewed to identify impaired waters and water body classifications. Permitting and certification requirements were also discussed.
- **Mines and Caves** – Provided through MDNR correspondence.
- **Wetland and Waters of the U.S.** – Identified from mapping data obtained from the National Wetland Inventory website. The Executive Order Protection of Wetlands and permitting requirements were also discussed.
- **Historic Resources** – Identified from the Historic Preservation Commission, City of Kansas City, MO; State Historic Preservation Office, Jefferson City, MO; State Historic Preservation Office, Topeka, KS; State Historical Society of Missouri-Kansas City, Kansas City, MO; National Archives Records Administration II (NARA), College Park, MD; Historic American Buildings Survey (HABS) and the Historic American Engineering Record (HAER) archives, National Park Service (NPS), Department of Interior (DOI); Linda Hall Library, Kansas City, MO; Special Collections, Missouri Valley Room, Kansas City Public Library, Kansas City, MO; North Kansas City Public Library, North Kansas City, MO; Architectural & Historical Research, LLC, Kansas City, MO; Mid-Continent Library, Jackson County, MO; and Wyandotte County Historical Society, Wyandotte County, KS.
- **Potential or Recognized Hazardous Materials Sites** – Identified from Environmental Data Resources, Inc. (EDR) database report and MDNR Environmental Site Tracking and Research Tool (E-START).
- **Natural Habitat and Threatened and Endangered Species** – Identified from Missouri Department of Conservation's (MDC's) Natural Heritage Review database, the MDC's Missouri Fish and Wildlife System, the Kansas Department of Wildlife, Parks & Tourism (KDWP&T) Species List, the U.S. Fish & Wildlife (USFWS) Information Planning and Conservation System (IPaC), correspondence from the KDWP&T, and MARC Natural Resources Inventory (NRI) dataset. Applicable regulations were also discussed.
- **Parks and Recreation Resources** – Identified from City of Kansas City, MO, Parks Department, Parks and Recreational Facilities webpage; U.S. DOI, NPS, Land and Water Conservation Fund, Section 6(f) Project Listings webpage. The

regulatory framework for impacts to park and recreational facilities was presented, including Section 4(f) and, Land and Water Conservation (Section 6(f)) requirements.

- **Traffic Noise** – Reviewed noise section from *I-29/35 Draft Environmental Impact Statement (2006)*. In addition, federal/state traffic noise standards and regulations were presented.
- **Air Quality** – Federal and state air quality guidelines and regulations were presented. Current attainment status for the National Ambient Air Quality Standards (NAAQS) as well as planning/programming information on the transportation conformity rule.

B. Is this resource present in the area and what is the existing environmental condition for this resource?

The existing conditions of each of the resources listed within the study area have been described in Chapter 3 of the PEL Study. A brief summary is provided below:

- **Land Use** – Industrial is the predominant existing land use, with 76 percent of the total make-up of the Study Area and found primarily in the West Bottoms and Downtown Airport districts.
- **Socioeconomic Factors** – Out of the XX percent of the population of census tracts within the Study Area are minority; XX percent of the population of census tracts within the Study Area are low-income; XX percent of the population of census tracts within the Study Area are aged.
- **Floodways and Floodplains** – Regulated floodways associated with the Kansas and Missouri Rivers are within the Study Area. In addition to 100-year floodplains along the Kansas and Missouri Rivers there are 100-year floodplains prone to shallow flooding in the West Bottoms District, Harlem District, and at Richard L. Berkeley Riverfront Park all of which are located within the Study Area. Levees are present along both sides of the Kansas and Missouri Rivers within the Study Area.
- **Water Quality** – Surface water bodies within the Study Area include the Kansas and Missouri Rivers. According to the State of Missouri Impaired Waters 303(d) list the Missouri River is impaired due to E. Coli levels. According to the State of Kansas Impaired Waters 303(d) list the Kansa River is impaired due to total suspended solids levels. There are over 900 wells within the Study Area, of which about 400 are abandoned, and about 500 are monitoring wells. There are no known waters designated for Cold Water Habitat, Outstanding National Resource Waters, Outstanding State Resource Waters, Biocriteria Reference Locations or Losing Streams within the Study Area.
- **Mines and Caves** – The Study Area does not lie within a former mining district and there are no recorded mines or caves within the Study Area. There are a number of utility tunnels underlying the Study Area including the former West Bottoms streetcar tunnel, trans-Missouri River water tunnel, as well as others.
- **Wetlands and Waters of the U.S.** – The majority of wetlands identified in the Study Area are riverine wetlands with most occurring in a narrow fringe along the Kansas and Missouri Rivers. There are 16 separate wetland locations for a total of approximately 930 acres, the majority of which are inundated by the Kansas and

Missouri Rivers, with the exception of a sizeable area located south of the Wheeler Downtown Airport (178 acres).

- **Historic and Cultural Resources** – Within the Study Area there are more than 100 single sites and districts listed in the NRHP. These assets include commercial, industrial, archeological, parks and boulevards, and transportation related resources throughout the Kansas City downtown neighborhoods and portions north of the Missouri River such as Harlem and North Kansas City. In addition, there are several historic assets located in the Study Area that are listed on the Kansas City Register of Historic Places and those that appear to retain integrity and therefore significance.
- **Potential or Recognized Hazardous Materials Sites** – Within the Study Area 23 sites were identified as having the high potential to impact the location of transportation improvements.
- **Natural Habitat and Threatened and Endangered Species** – There are 24 species federally- or state- listed as threatened, endangered or species of concern that could potentially occur within the Study Area. There are no state identified Conservation Opportunity Areas or designated Natural Areas within the Study Area. However, the MARC has identified Forest Restoration Priorities and Forest Conservation Areas within the Study Area.
- **Parks and Recreation Resources** – There are 16 existing parks or recreational resources within the Study Area.
- **Traffic Noise** – Highway noise within the Study Area is typical of that found in an urban environment. At the time of the *I-29/35 Draft Environmental Impact Statement* was completed in 2006 existing noise levels near the northeast corner of the Downtown Loop ranged from 61 decibels (dB) to 68 dB. The Study Area contains a variety of noise sensitive receptors such as residences, schools, parks, picnic areas, motels, hotels, churches, and libraries.

C. What are the issues that need to be considered during NEPA, including potential resource impacts and potential mitigation requirements (if known)?

Chapter 3 of the Beyond the Loop PEL Study Report identifies resources that may need to be further examined during NEPA studies, as warranted, depending on project-level impacts identified during the NEPA phase of project development, noted in Chapter 8 of the Beyond the Loop PEL Study Report. The following includes protocol for resource categories determined during NEPA to be potentially impacted by a proposed alternative. A brief summary is provided below:

- **Land Use and Planning** – Any direct effects to businesses or residences (acquisitions) and associated displacement assistance under the provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 would need to be considered during a NEPA-level study. Any indirect effects stemming from access alteration due to the project with associated land use and development effects (induced development; alteration of land development patterns) would also need consideration, to ensure the project is compatible with the MARC regional growth. The consistency of the proposed projects with other local city planning would also need to be ensured throughout the NEPA process.
- **Socioeconomic Factors** – Any impacts to low income and minority populations

would need to be assessed in accordance with EO 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations and mitigation would be provided if warranted. The NEPA study would also include measures to ensure the opportunity for participation and input from EJ populations in the project development process.

- **Community Resources** – Although direct impacts to these resources would not be anticipated, potential impacts stemming from indirect effects of the project such as access alteration would be assessed, if warranted.
- **Existing Transportation Infrastructure** – Connectivity of a proposed alternative with the existing transportation infrastructure, as well as project effects on local access and mobility must be considered during the NEPA process. Compatibility of non-roadway alternatives with prospective transit and rail improvements must also be considered.
- **Water Resources** – NEPA-level studies would need to consider impacts to jurisdictional waters and wetlands, including Section 404 permit and potential mitigation requirements. Consideration would need to be given to the drainage and irrigation features during design so as to not compromise the function of ditches or drains in the study area.
- **Floodplains** – Design requirements to prevent floodplain impacts would also need to be considered, along with appropriate coordination requirements with local FEMA floodplain officials.
- **Air Quality** – Demonstration of consistency of the proposed alternatives with the MARC RTP and current STIP would be needed. Air quality analyses may need to be prepared in accordance to air quality regulations and guidelines.
- **Traffic Noise** – Traffic noise impacts would need to be determined in accordance with applicable guidelines. If the project results in noise impacts, noise abatement measures would need to be considered and evaluated for implementation into the project design. If noise abatement is proposed, noise workshops would take place.
- **Hazardous Materials** – A Phase I initial site assessment would be performed on a preferred alternative during NEPA. Phase II site investigations may be required, depending on the results of the Phase I assessment, project design, and locations of proposed ROW locations. Any mitigation requirements for hazardous materials sites would be discussed.
- **Biological Resources** – If a federally-listed species or its habitat was determined to be affected by the preferred alternative, a biological assessment would be required with and affect determination (No Effect, May Affect, but is not likely to Adversely Affect; or May Affect, is likely to Adversely Affect) for submittal to the USFWS to initiate consultation. Consultation would be informal or formal depending on proposed impacts. Similarly, any impacts to State-listed species would be coordinated with either the MDC or KDWP&T. In addition to listed species, any impacts to migratory birds would require coordination with the USFWS.
- **Parks and Recreation Facilities** – Any direct impacts (taking) and construction use impacts to parks and recreation areas would be quantified and/or assessed

for a proposed project-level alternative during the NEPA study. Section 4(f) coordination with the FHWA would be undertaken. Avoidance and minimization of impacts would be determined during the coordination effort.

- **Historic and Cultural Resources** – Any effects (direct and indirect) to historic and archaeological resources during project-specific NEPA studies using an Area of Potential Effects (APE) would be summarized in future project-specific research designs, historic resources survey reports or archaeological survey reports and coordination with the SHPO would be undertaken. As warranted, project design would be modified to avoid adverse impacts to historic resources.
- **Utilities/Transmissions** – Adjustment or relocation of aboveground or underground utilities, and associated costs, would be considered in the NEPA study.
- **Prime Farmland** – No impacts are anticipated since there are no identified prime farmlands within the study area.

D. How will the planning data provided need to be supplemented during NEPA?

Depending on the timing of future NEPA efforts, resources may require reassessment due to new regulations, changes to listed threatened and endangered species, age of data, etc. In summary, the data collected during the Beyond the Loop PEL Study will serve as a baseline for NEPA analyses, however, it would be supplemented with more project-specific data and field reconnaissance information.

E. List environmental resources you are aware of that were not reviewed in the PEL study and why. Indicate whether or not they will need to be reviewed in NEPA and explain why.

The list of resources reviewed in the Beyond the Loop PEL Study is comprehensive, while being consistent with resources typically considered in a NEPA analysis. Although the level of analysis detail would be greater in a NEPA study for all resources, it is not anticipated that additional resources would need to be included.

F. Were cumulative impacts considered in the PEL study? If yes, provide the information or reference where the analysis can be found.

No, cumulative impacts will be addressed in the NEPA phase.

G. Describe any mitigation strategies discussed at the planning level that should be analyzed during NEPA.

No, mitigation strategies were discussed in the PEL that will be addressed in the NEPA phase.

H. What needs to be done during NEPA to make information from the PEL study available to the agencies and the public? Are there PEL study products which can be used or provided to agencies or the public during the NEPA scoping process?

The NEPA process will use the PEL Study information as a starting point and the documents developed during the PEL are available at the project website (<http://www.beyondtheloopkc.com/#about>), MARC website (<http://www.marc.org/Transportation/Plans-Studies/Transportation-Plans-and-Studies/Special-studies-and-projects>)/office, MoDOT website (<http://www.modot.org/kansascity/>)/office and should be added or linked from the NEPA project website at a minimum. Any and all of the documents should be reviewed during the NEPA scoping process to ensure the tasks needed for NEPA are properly identified.

- I. Are there any other issues a future project team should be aware of? Examples: Controversy, utility problems, access or ROW issues, encroachments into ROW, problematic land owners and/or groups, contact information for stakeholders, special or unique resources in the area, etc.

The PEL addresses many of the concerns to be addressed under NEPA, and the strategies discussed are consistent with generally accepted practices. Concerns for the future, project-specific development and design of the Preferred Strategies include:

- Identification of funding sources
- Minimizing impacts to utilities within the Study Area
- Coordination with the various railroad companies
- The Unified Government of Wyandotte County and Kansas City, Kansas' concerns regarding potential travel times and added delays to areas east of I-35 along I-70, specifically related to the Remove and Reclassify option were documented and are included in Appendix B.

APPENDIX B

STATE OF KANSAS

Department of Transportation
Office of the Secretary
Dwight D. Eisenhower State Office Building
700 S.W. Harrison Street
Topeka, KS 66603-3745



GOVERNOR JEFF COLYER, M.D.
RICHARD CARLSON, SECRETARY

Phone: 785-296-3461
Fax: 785-368-7415
kdot#publicinfo@ks.gov
<http://www.ksdot.org>

April 3, 2018

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

Dear Mr. Warm,

In a letter dated March 2, 2017, the Kansas Department of Transportation advised the Governor of the "Beyond the Loop" transportation study and that opponents of the Remove and Reclassify option could potentially appeal to his office. This letter was distributed to the Beyond the Loop Study Management Team, and for reference I have included a copy with this correspondence.

The letter also stated the department's primary concerns with the Remove and Reclassify option, those being reduced interstate access to the Fairfax industrial center and downtown Kansas City, Kan., and the apparent inability of I-670 to safely and efficiently accommodate I-70 traffic. We also noted this option would degrade the efficient flow of business, commuter and freight traffic through the area.

The Unified Government of Wyandotte County and Kansas City, Kan. has expressed similar concerns throughout the planning process, and in a letter dated March 27, 2018, the County Administrator requested the Remove and Reclassify option be effectively removed from the Beyond the Loop study. The fact a key study partner continues to express grave concerns this late in the game is somewhat alarming and may indicate the planning process is not yet complete, and additional conversations might need to take place.

I would like to recognize the request made by the Unified Government of Wyandotte County and Kansas City, Kan., reiterate our longstanding concerns with the Remove and Reclassify option, and request these letters be included with the final PEL document.

Sincerely,

A handwritten signature in blue ink that reads "Catherine M. Patrick".

Catherine M. Patrick, P.E.
State Transportation Engineer

C:

Richard Carlson, Secretary of Transportation and Director of the Kansas Turnpike Authority

Larry L. Thompson, P.E., Director of Operations

Chris J. Herrick, P.E., Director of Planning and Chief Financial Officer

Ronald J. Seitz, P.E., Director of Engineering and Design

Michael J. Moriarty, Chief of Transportation Planning

Douglas G. Bach, County Administrator

Ron Achelpohl, P.E., Director of Transportation and Environment, MARC

Patrick K. McKenna, Director, MoDOT

Ed Hassinger, P.E., Chief Engineer, MoDOT

Beyond the Loop Study Management Team

Dwight D. Eisenhower State Office Building
700 S.W. Harrison Street
Topeka, KS 66603-3745

Richard Carlson, Secretary



Phone: 785-296-3461
Fax: 785-368-7415
Hearing Impaired - 711
kdot#publicinfo@ks.gov
<http://www.ksdot.org>

Sam Brownback, Governor

March 2, 2017

The Honorable Sam Brownback
Governor of Kansas
300 S.W. 10th St.
Topeka, KS 66612

Dear Governor Brownback:

I want to bring to your attention a significant transportation study underway in downtown Kansas City, Mo., that could impact business and community interests in Kansas City, Kan., and beyond.

The primary purpose of the study, "Beyond the Loop," is to explore options to replace or rehabilitate the U.S. 169 bridge, also known as the Buck O'Neil Bridge, in Kansas City, Mo. But the study, led by Mid-America Regional Council in financial partnership with Kansas City, Mo., also revives an idea to directly connect downtown and the River Market area. A component of that proposal would eliminate a stretch of I-70 that acts as a barrier separating the two areas. That would reroute I-70 traffic onto I-670 to the south and would have significant impacts on Fairfax and Kansas City, Kan.

For example, interstate access to the Fairfax industrial center and downtown Kansas City, Kan., would be reduced. And, experts at both KDOT and the Missouri Department of Transportation question the ability of I-670 to handle combined interstate traffic (both I-70 and I-670). We also think this proposal would degrade the efficient flow of business, commuter and freight traffic through the area.

Again, while this option isn't an expressed purpose of the study, we expect it to be evaluated as one of the options identified in the study process. We think opponents of the plan on the Kansas side could appeal to your office if and when serious discussion takes place.

As always, we are happy to provide more information about the study and potential discussion points. I just wanted to make sure you were aware of the study and the concerns.

Sincerely,

Richard Carlson
Secretary of Transportation
Director of the Kansas Turnpike Authority



County Administrator's Office
Douglas G. Bach, County Administrator

701 North Seventh Street, Ste. 945
Kansas City, Kansas 66101
(913) 573-5030 • FAX (913) 573-5540

March 27, 2018

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

Mr. Warm,

During a Special Session of the Unified Government Board of Commissioners on March 1, 2018, Ron Shikevitz from the North Loop PEL consulting team and Rob Richardson from my staff presented the final options to the Board of Commissioners. Ron Alchelpohl from your staff was also in attendance. The presentation fairly presented the study purpose and need as well as the build options and the comparisons of their projected efficiency verses the no build alternative. All options were presented with any necessary mitigation measures to prevent a complete failure of the system.

As you are aware, the Unified Government and our partners KDOT, the Fairfax Industrial District and Downtown Shareholders have been wary of the portion to remove the North Loop of I-70 and redesignate I-70 to the South Loop. You will recall that we were asked to sign on to various North Loop PEL "approval" strategies. I did not feel any of those gave the Unified Government an adequate participatory position in the decision making and I never agreed to any approval methodology that could unilaterally approve this project without the support of the Unified Government.

The presentation confirmed our fears. In the PM rush hour, the proposal performs poorly. The I-70 traffic movement is extremely important to Kansas City, Kansas and Wyandotte County. Unfortunately, some measures of the Remove and Redesignate option increase the travel time over this small segment by over 3 minutes. Other segments perform poorly as well. For your reference I have included the relevant chart from that presentation as Attachment #1.

I see no way to allay our concerns over the Remove and Redesignate option currently within the North Loop PEL study recommendations. On behalf of the Unified Government and our partners, I would respectfully ask that the North Loop PEL remove the Remove and Redesignate Option from the possible alternatives moving forward for future evaluation. If it continues to be a part of the alternatives moving forward, we will not be able to support the study when it moves forward thru the Mid America Regional Council Approval Process.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug BH", is positioned above the printed name.

Douglas G. Bach
County Administrator

CC: Mayor David Alvey, Unified Government of WYCO/KCK
Secretary Richard Carlson, Kansas Department of Transportation
Troy Schulte, City Manager, City of Kansas City, MO
Mike Moriarty, Kansas Department of Transportation
Jeff Fisher, Public Works Director, Unified Government of WYCO/KCK
Rob Richardson, Urban Planning Director, Unified Government of WYCO/KCK
Jason Norbury, Downtown Shareholders
Melissa Clark, Fairfax Industrial District

Attachment

Attachment #1

2040 Gate-to-Gate Travel Times I-70 and I-670 Connections

Movement	2040 Base		Access Consolidated		Compressed Footprint		Redesignated Reclassified	
	AM	PM	AM	PM	AM	PM	AM	PM
WB I70_East to WB LCViaduct	04:35	04:15	05:42	04:12	04:22	04:05	05:22	05:42
EB LCViaduct to EB I70_East	04:22	04:46	04:12	04:30	04:06	04:51	05:20	09:53
EB I670_West to EB I70_East	02:49	06:14	02:43	09:04	02:56	06:36	04:52	10:06
WB I70_East to WB I670_West	03:20	02:35	03:41	02:38	03:43	02:33	04:30	02:45