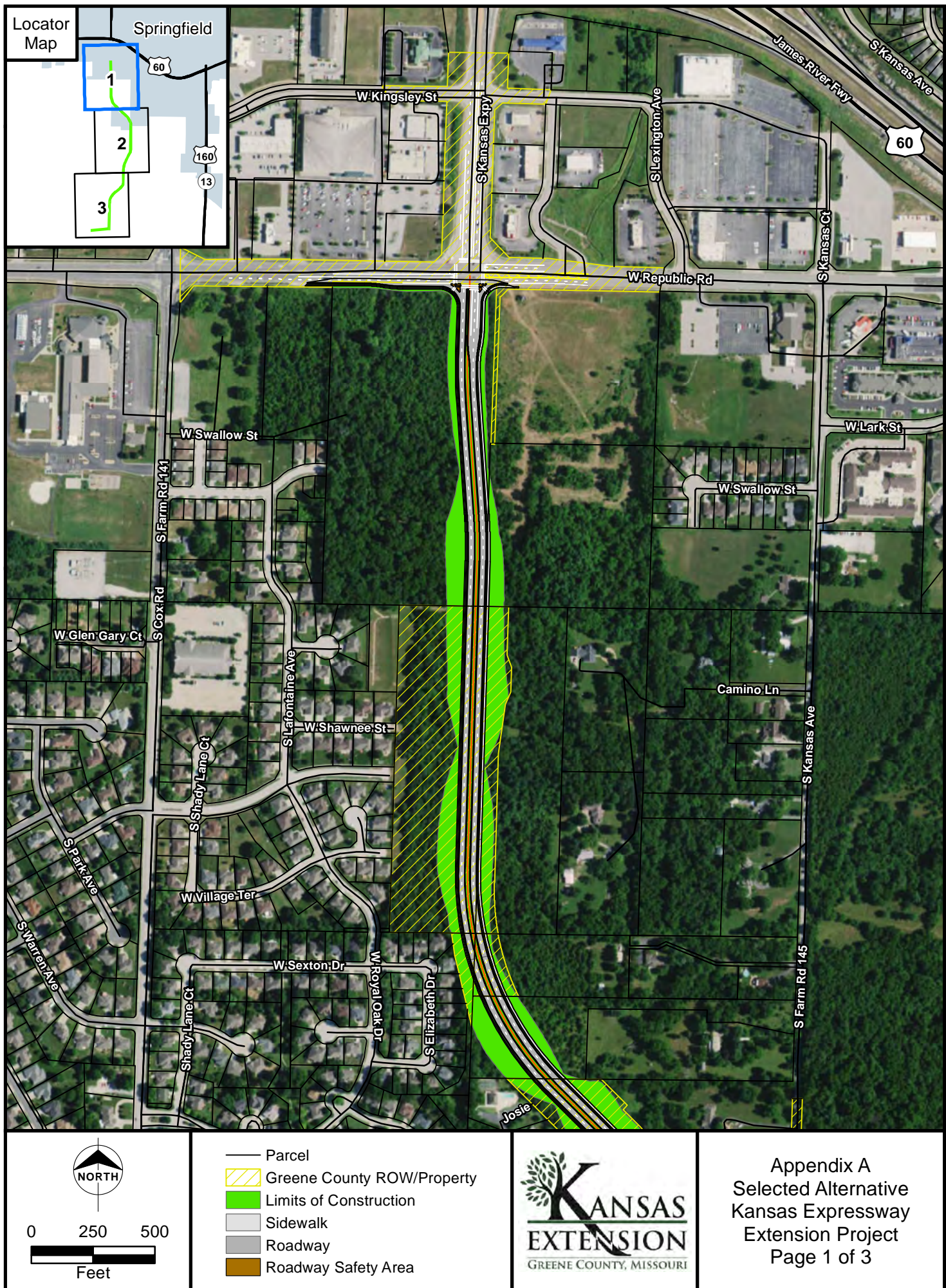
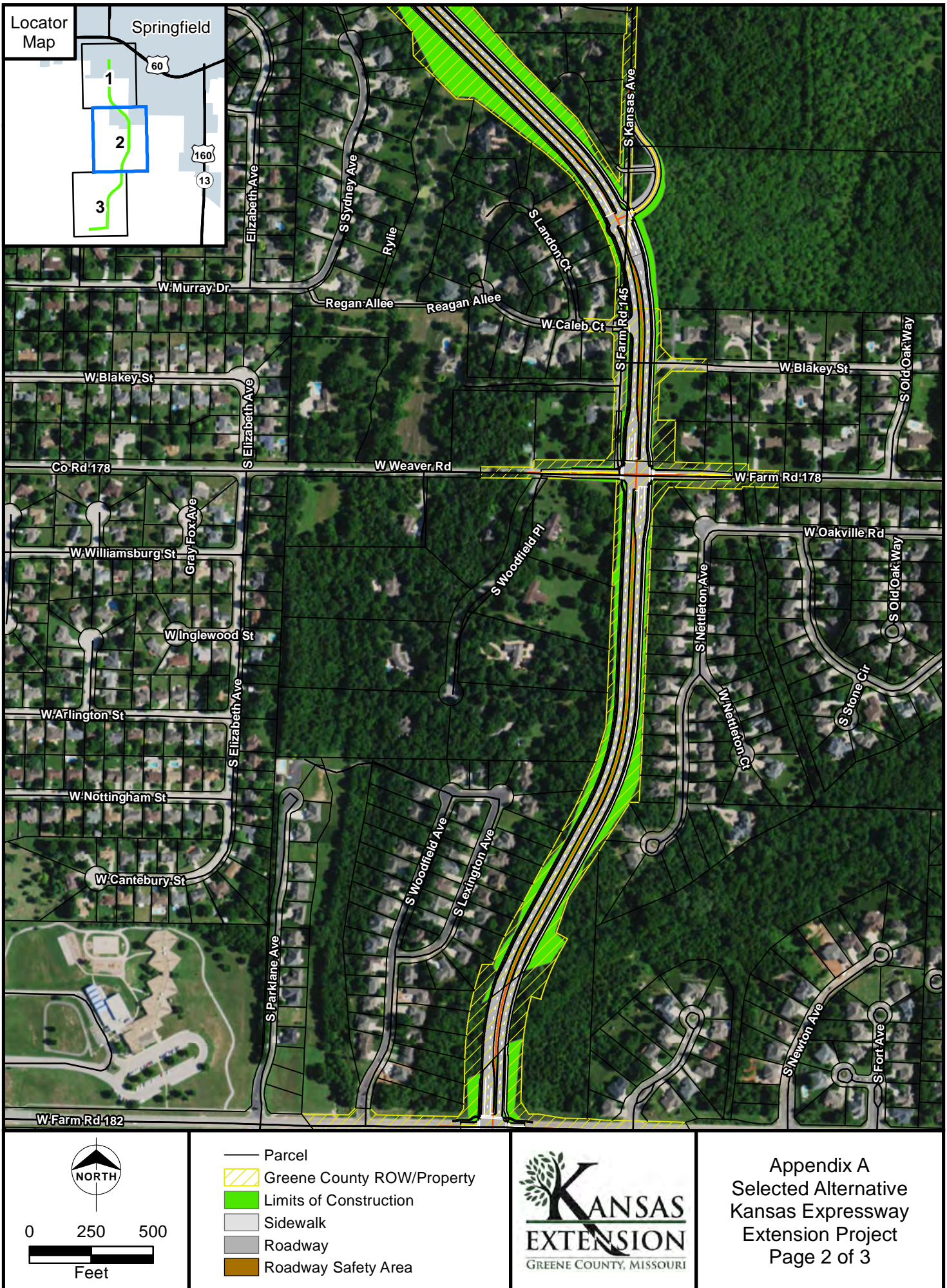
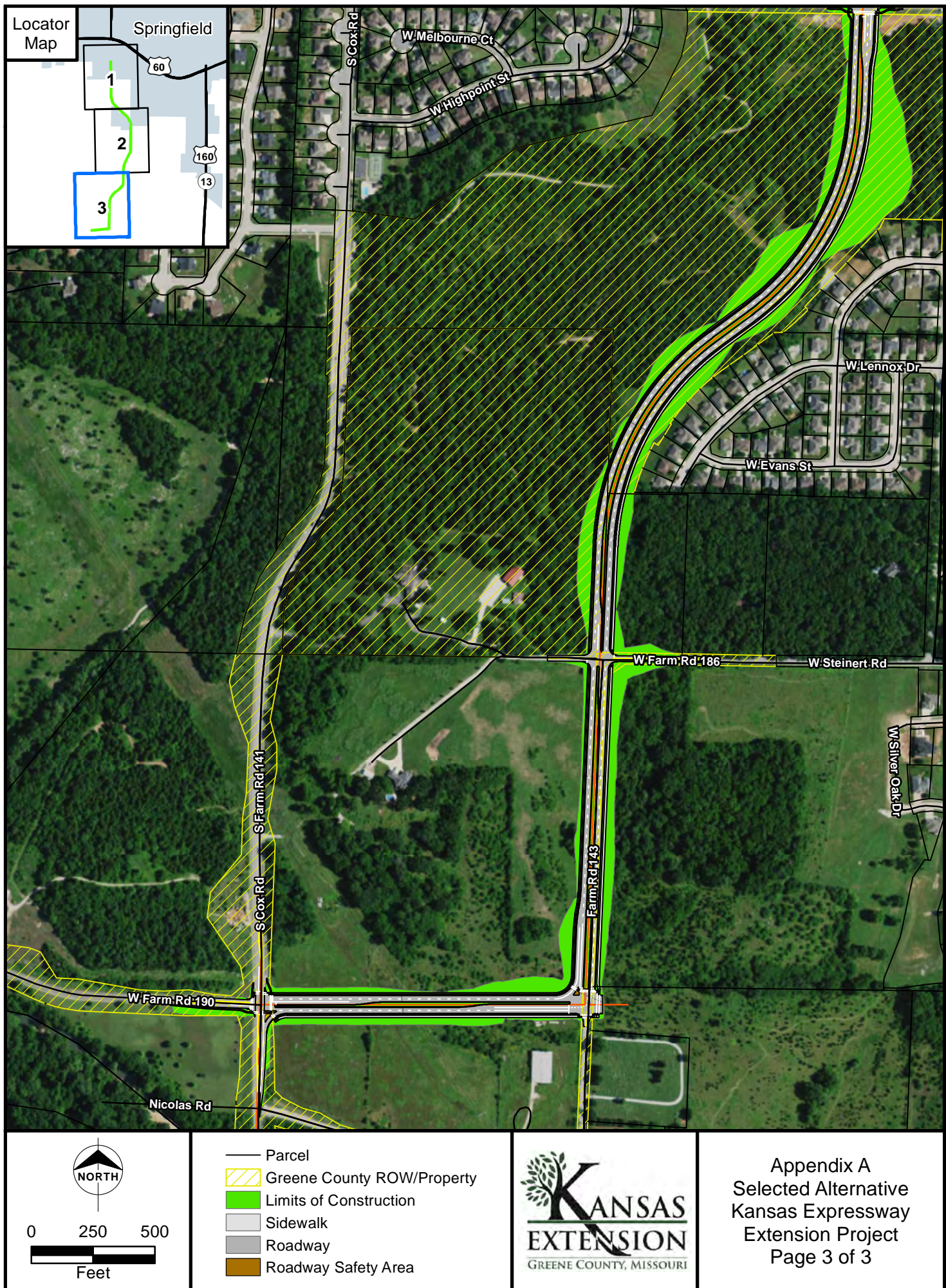


APPENDIX A - SELECTED ALTERNATIVE







APPENDIX B - EA NOTICE OF AVAILABILITY AND DISTRIBUTION

NOTICE OF AVAILABILITY and PUBLIC HEARING

Environmental Assessment: Kansas Expressway Extension Project Greene County, Missouri

The Greene County Highway Department and the Federal Highway Administration (FHWA) are pleased to announce the upcoming availability of the *Kansas Expressway Extension Project Environmental Assessment (EA)*.

The EA will be available for public review and comment from March 7, 2017 through April 7, 2017. The EA was prepared in accordance with the National Environmental Policy Act (NEPA) and the National Historic Preservation Act, 23 CFR 771, and regulations of the Council on Environmental Quality, to provide guidance in determining the appropriate actions needed to address safety and operations on the Kansas Expressway extension.

Public Review: Public involvement is considered an important component of a successful planning process. An electronic version of this document will be placed on the Greene County Highway Department's website at https://greenecountymo.gov/highway/future_projects.php. This website will provide access to the EA and related documents for public review. Written comments can be mailed or emailed to:

Adam Humphrey, PE
Assistant Administrator
Greene County Highway Department
2065 N Clifton Avenue
Springfield, MO 65803
KansasExtension@greenecountymo.gov

Please submit comments no later than **April 7, 2017**.

The EA will be available for review beginning March 7, 2017 at the Greene County Courthouse, City of Springfield City Hall, MoDOT District Office – Springfield, The Library Center – Springfield, Springfield City Utilities, Christian County Courthouse, City of Nixa City Hall, and online where indicated above. CDs containing the EA are obtainable upon request from Greene County at the address above.

NOTICE OF PUBLIC HEARING

A public hearing concerning the Kansas Expressway extension in Greene County will be held on March 23, 2017 at **Wanda Gray Elementary (2101 W. Farm Road 182, Springfield, MO 65810)** from 6:00 – 8:00 p.m. The hearing will offer an opportunity for citizens to learn more about the proposal and to provide comments on the project. Attendees are welcome to come and go at any point during the open house, no formal presentation will be given.

This meeting site is accessible to individuals with disabilities. To request translation services, other special accommodation and project information, please call (417) 829-6536 or e-mail KansasExtension@greenecountymo.gov.

NOTICE OF AVAILABILITY

Environmental Assessment: Kansas Expressway Extension Project Greene County, Missouri

The Greene County Highway Department and the Federal Highway Administration (FHWA) is pleased to announce the availability of the *Kansas Expressway Extension Project Environmental Assessment (EA)*.

The EA will is currently available for public review and the comment period has been extended to April 22, 2017. The EA was prepared in accordance with the National Environmental Policy Act (NEPA) and the National Historic Preservation Act, 23 CFR 771, and regulations of the Council on Environmental Quality, to provide guidance in determining the appropriate actions needed to address safety and operations on the Kansas Expressway extension.

Public Review: Public involvement is considered an important component of a successful planning process. An electronic version of this document will be placed on the Greene County Highway Department's website at https://greenecountymo.gov/highway/future_projects.php. This website will provide access to the EA and related documents for public review. Written comments can be mailed or emailed to:

Adam Humphrey, PE
Assistant Administrator
Greene County Highway Department
2065 N Clifton Avenue
Springfield, MO 65803
KansasExtension@greenecountymo.gov

Please submit comments no later than **April 22, 2017**.

The EA is available for review at the Greene County Courthouse, City of Springfield City Hall, MoDOT District Office – Springfield, The Library Center – Springfield, Springfield City Utilities, Christian County Courthouse, City of Nixa City Hall, and online where indicated above. CDs containing the EA are obtainable upon request from Greene County at the address above.

**APPENDIX C - PUBLIC HEARING SUMMARY AND MEETING
MATERIALS**

Public Hearing Open House Kansas Expressway Extension

**Join the Greene County Highway Department
for a public hearing open house for the Kansas
Expressway extension project.**

**DATE:
March 23, 2017**

**TIME:
6:00 - 8:00 pm**

*Attendees are welcome to come and go at any point during the
open house, no formal presentation will be given.*

**LOCATION:
Wanda Gray Elementary
2101 W. Farm Road 182**

**Attendees will be able to view updated results from
the findings in the Environmental Assessment, speak
to specialists working on the project, review the
updated project timeline, and share their input.**

For questions, contact: KansasExtension@greencountymo.gov



The Greene County Highway Department invites you to attend a public hearing for the Kansas Extension project. The public hearing will be held:

March 23, 2017

6:00 - 8:00 pm

Wanda Gray Elementary

2101 W. Farm Road 182

Springfield, MO 65810

The public hearing will include updated information from the Environmental Assessment (EA), a chance for attendees to speak to specialists working on the project, an updated project timeline, and an opportunity to provide comments. Attendees are welcome to come and go at any point during the open house, no formal presentation will be given.

The EA document will be available for review starting March 7, 2017 on the project [website](#).

Any questions about the Kansas Extension project can be sent to: KansasExtension@greencountymo.gov.

Want to change how you receive these emails?

You can [update your preferences](#) or [unsubscribe from this list](#)

Public Hearing for Kansas Expressway Extension Project



Join the Greene County Highway Department for a public hearing for the Kansas Expressway extension project.

**March 23, 2017
6:00 - 8:00 pm**

**Wanda Gray Elementary
2101 W. Farm Road 182
Springfield, MO 65810**

For questions, contact:
KansasExtension@greencountymo.gov



Public hearing for Kansas Expressway extension project

The Greene County Highway Department is hosting a public hearing for the Kansas Expressway Extension project. The public hearing will be held:

March 23, 2017
6:00 – 8:00 p.m.
Wanda Gray Elementary
2101 W. Farm Road 182
Springfield, MO 65810


In late 2015, the Greene County Highway Department started the next phase of the Kansas Expressway Extension project by conducting an environmental study along the future roadway corridor. The extension of Kansas Expressway has been planned for several years to provide an additional north-south roadway in southern Greene County that will improve traffic flow in the area. Current plans are to extend Kansas Expressway from where it currently ends at Republic Road for a little over two miles south to a connection with Farm Road 141 (Cox Road).

The public hearing will include updated information from the Environmental Assessment (EA), a chance for attendees to speak to specialists working on the project, an updated project timeline, and an opportunity to provide comments. Attendees are welcome to come and go at any point during the open house, no formal presentation will be given.

The EA document will be available for review and comment from March 7, 2017 – April 7, 2017. The EA will be available for review at: Greene County Courthouse, City of Springfield City Hall, MoDOT District Office – Springfield, The Library Center – Springfield, Springfield City Utilities, Christian County Courthouse, and City of Nixa City Hall. The document will also be available online at:
https://greenecountymo.gov/highway/future_projects.php

Questions about the open house or the project can be emailed to
KansasExtension@greenecountymo.gov.

###

<div><div>Kansas EXTENSION <small>GREENE COUNTY, MISSOURI</small></div></div> <div>Kansas Expressway Extension Project Public Hearing Sign-in Sheet</div> <div>March 23, 2017</div>			
	Name	Email	Mailing Address
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Traffic Noise

Sound is anything that we hear. Sound that is undesirable or unwanted is considered noise.

Traffic noise is not consistent. Noise levels change with the number, type and speed of the vehicles.

Traffic noise must be analyzed during the environmental review process when a roadway would be constructed in a new location. For the Kansas Extension project, we followed FHWA and MoDOT noise policy guidance that included:

- Measuring current noise at specified locations along the corridor
- Developing a model to predict future noise levels
- Identifying locations where noise abatement evaluations should be performed
- Identifying areas that qualify for a noise wall, per MoDOT policy

Measuring Current Noise

A series of noise levels were measured at representative receptors in October 2015. A receptor is a location that would be sensitive to noise (i.e. houses, churches, daycares, hospitals, etc.).

Predicting Future Noise

A model was developed to predict what the future noise levels would be in 2040, after the road is built. The Federal Highway Administration’s Traffic Noise Model was used. Any representative receptor that was modeled to experience 67+ decibels or showed an increase of 15 decibels or more between current and predicted noise levels is considered to be impacted, as defined by MoDOT policy.

Noise Study Results

Based on the modeling results, four areas along the corridor are expected to be impacted by the Kansas Extension project and required a noise abatement analysis to evaluate where noise walls would be feasible and reasonable.

Feasibility

For a noise wall to be considered feasible, MoDOT requires the wall to provide at least a 5 dBA reduction for at least 67% of the first-row, impacted receptors.

The wall must also be feasible from an engineering standpoint, which takes into account physical and constructibility constraints, such as topography, access, drainage, safety, maintenance, and presence of other noise sources.

Reasonableness

For a noise wall to be considered reasonable, it must provide at least a 7 dBA reduction for 67% of benefited first-row receptors. Additionally, the noise wall can’t exceed 1,300 square feet per benefited receptor.

A map showing the locations of the noise walls that were identified as feasible and reasonable during the Environmental Assessment is included in this handout.

Final recommendations for the location and construction of noise walls will be made after final design and additional public involvement. Before a final decision is made, property owners and benefited residents must provide their viewpoint by ballot, with more than 50% in favor. Information about that input process will be provided later this year.



Project Overview

30 years of planning to provide an additional north-south corridor in southern Greene County. Plans are to extend the Kansas Expressway 2.3 miles south and connect with Cox Road (FR 141).



Parkway-like design.

- Maximum speeds of 40 mph
- Ultimate condition will include two lanes in each direction
- Phased construction approach will be used and initially one lane in each direction will be built
- Intersection improvements and turning lanes
- Grass medians
- Bicycle paths



Example of a parkway design



Builds on existing right of way

- Conceptual planning for this project began in the 1980s
- Public outreach and roadway alignment studies in the 1990s
- Right of way along the proposed corridor was purchased by Greene County
- 90% of the needed right of way is owned and preserved
- Preliminary design and environmental screenings were conducted in the 2000s



Environmental findings incorporated

- Greene County is working with federal and state agencies as part of the NEPA process
- In-depth environmental studies were done, including: historical and cultural resources, wetland delineations, noise analysis, habitat assessments, and geotechnical surveying
- Roadway design will be engineered to address environmental resources

At the conclusion of this environmental study, the roadway design elements can be finalized in anticipation of starting construction in 2018.

We Want To Hear From You

As part of the environmental study, required as part of the National Environmental Policy Act (NEPA), an Environmental Assessment (EA) document has been prepared and is available for public comment. The complete EA document is available online at: https://greenecountymo.gov/highway/future_projects.php.

The website includes a place to share your comments online, or you can email comments directly to: KansasExtension@greenecountymo.gov. You can also mail comments to Adam Humphrey, PE, Greene County Highway Department, 2065 N. Clifton, Springfield, MO 65803. **Comments will be accepted through April 22, 2017.**

Contact Us

For questions or comments email: KansasExtension@greenecountymo.gov



Environmental Assessment

As part of the environmental study, required as part of the National Environmental Policy Act (NEPA), the project team has surveyed the Kansas extension corridor and looked at:

Cultural and Historic Resources

The project team conducted a records search for historic resources and a walking survey for archaeological resources. The study examined the exploration and settlement in the project vicinity, Civil War battles in the area, agricultural development in the area, and 20th century development.

To protect these resources, their location is kept confidential, but any effects from the project that are a concern will be taken into account.

Natural Resources

Water Resources: Six streams were identified within the Corridor. Necessary permits would be obtained for all construction.

Air Quality: The project is expected to reduce congestion on other roadways in the area as well as shorten travel distance and idling times at intersections. The area is not expected to see a detrimental impact on air quality.

Floodplains: These occur along Ward Branch, Workman Branch, and the James River Basin. The project will be designed for special protection during construction and for vehicle safety following completion. Minimal, if any, changes to floodflows is expected. Necessary permits would be obtained prior to construction.

Climate Change: The project is expected to reduce congestion on other roadways in the area as well as shorten travel distances and idling times at intersections which is expected to reduce greenhouse gas emissions.

Hazardous Materials: Surveying to determine potential presence of hazardous materials in the corridor has been completed. There are no existing signs of concern. If a concern is identified during construction, applicable safety and mitigation efforts will be implemented.

Farmland: The project would have no adverse effect on prime farmland.

Key Issue: Geology

Karst features, such as caves and sinkholes, are common in the area and are something that Greene County is aware of and has experience working with when designing, constructing, and maintaining roadways.

During the Environmental Assessment, a variety of karst features were identified in the corridor. To mitigate potential impacts and hazards as part of the Kansas Extension project, the County will:

- Further identify and investigate karst features in the study area during the design process and develop a karst mitigation plan.
- Use best management practices during construction in areas where karst features are identified, which may include:
 - Conducting a geologic subsurface evaluation if new karst features are found during construction.
 - Installing stormwater control measures.
 - Positioning staging and refueling areas away from waterbodies and karst features.
 - Maintaining natural waterbody features.
 - Minimizing the removal of vegetation adjacent to rivers and streams.

Socioeconomics

Title VI and Environmental Justice: Human health, economic, and social effects on minority populations and low-income populations of the corridor were analyzed. Opportunities for community input to be considered in this project is an important part of environmental justice.

Land Development and Future Growth: The Kansas Extension would support continued economic vitality south of Springfield and provide access and capacity to serve current and planned growth and development.

Improved access and travel options: The project would result in improved travel times in the area, reduced congestion, improved emergency access, and linkages to local and regional bicycle and pedestrian trails. Safe, ADA-compliant access will be provided at intersections to provide pedestrian access. More details on locations of the pedestrian access will be determined during the design phase.

Key Issue: Sensitive Species

Sensitive Species: Ozark Cavefish

The project is not anticipated to adversely affect the Ozark cavefish. As a precaution during construction, mitigation efforts would include:

- Appropriate containment basins, silt fences, filter strips, and other appropriate measures would be used for retention of stormwater runoff.
- Construction debris would be contained and disposed of properly.
- Excess concrete and wash water would be disposed of in an area well away from karst features, streams, and wetlands.
- Disturbed areas would be revegetated promptly to limit erosion.
- Stationary fuel and oil storage containers would remain within a staging area or another confined area to avoid accidental introduction into the groundwater.

Key Issue: Sensitive Species

Sensitive Species: Indiana Bat, Northern Long-Eared Bat, Gray Bat

The project is not anticipated to adversely affect the Indiana Bat, the northern long-eared bat, or the gray bat. However, as a precaution during construction, mitigation efforts would include:

- While at this time, there are no known summer roost or maternity sites within several miles of the project area, Greene County commits to only clear potentially suitable bat roost trees between November 1 and March 31 to avoid impacts to females and non-flying juveniles in maternity roosts.
- Implement appropriate conservation measures in consultation with the U.S. Fish and Wildlife Service to protect any karst habitats shown to be used by protected species.
- Additional investigation of karst features for the presence or absence of bat use adjacent to and near the study corridor if needed.

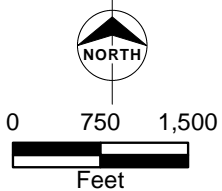
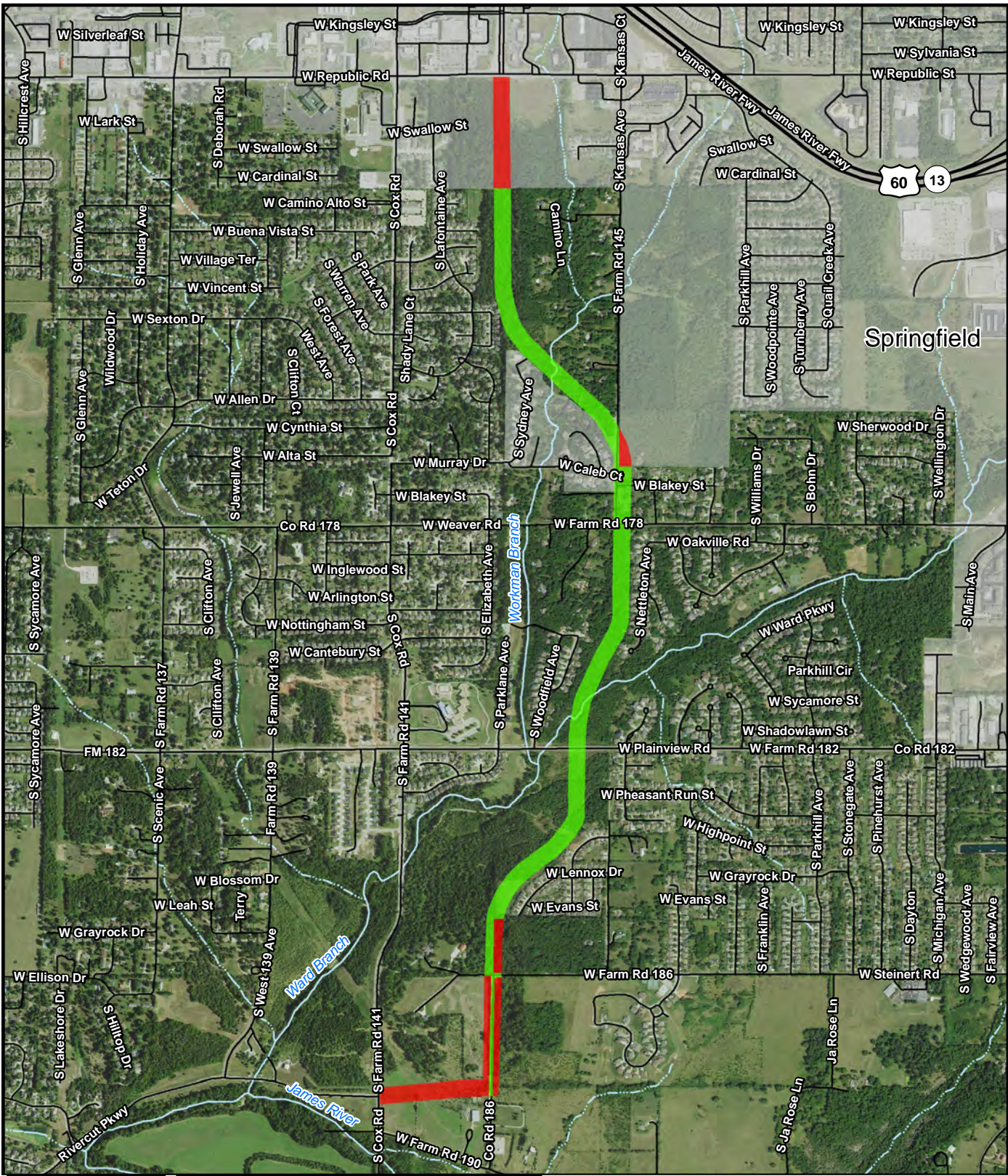
Parks and recreational areas near the corridor: The project would not impact any identified resources either directly or indirectly.

Visual Resources: The project would introduce a new roadway and bicycle/pedestrian paths which would be visible to many residents in the area, especially those adjacent to the corridor. Wooded areas outside the developed right of way could remain to provide a visual barrier between adjacent residences and the project.

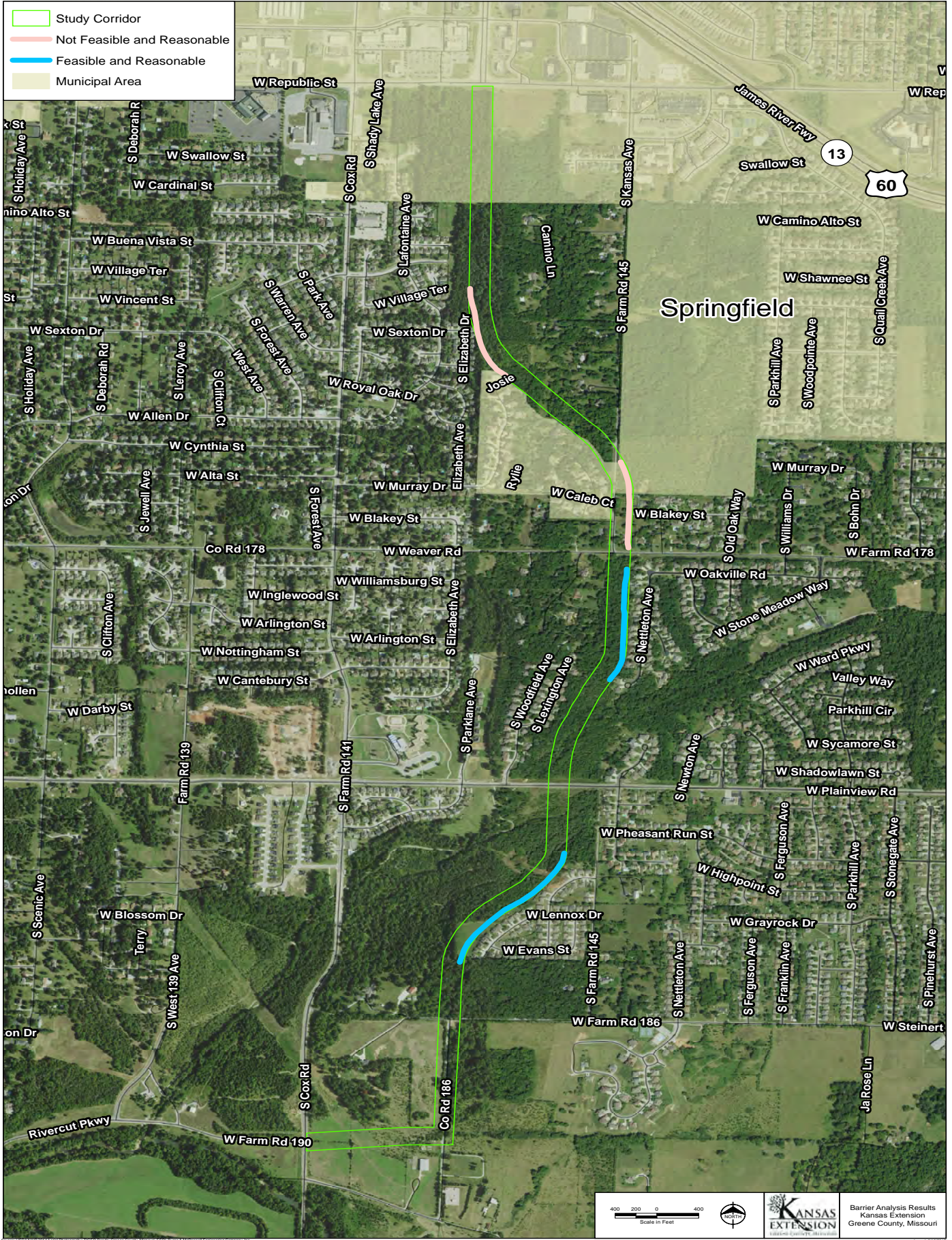
Anticipated Project Timeline

- October 2015 – December 2015**
Conducted environmental surveying
- February 2016**
Public information meeting
- Spring - Fall 2016**
 - Coordinated with federal and state agencies
 - Reviewed comments from public meeting
 - Finished environmental analyses
- Winter - Spring 2017 (TODAY)**
 - Draft Environmental Assessment published
 - Public hearing
 - Comment period: March 7 - April 22, 2017

- Summer 2017**
Preliminary plans and right of ways plans complete
- Fall 2017 - Spring 2018**
Purchase remaining right of way and complete final design
- Summer 2018**
Construction could begin pending funding considerations



- Right-of-Way Obtained
- Right-of-Way Needed
- Municipal Area
- Perennial Stream
- Intermittent Stream



[illegible]

[illegible]

Thank you for your input!



Kansas Extension Environmental Assessment Comment Card

Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

To receive updates on the project, please provide your name and email address:

Name:

Email:

Thank you!

Done

APPENDIX D - PUBLIC COMMENTS

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: A.G. Paul

Email: AG@SOF-USA.COM

Please return comments to: Adam Humphrey, PE, Greene County Highway Department,
2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension
Environmental Assessment document:

this is a waste of tax payer money
that should have never been started.
there are better ways to move traffic
south & north



COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: WAYNE GILBERT

Email: REICHER@AOL.COM

Please return comments to: Adam Humphrey, PE, Greene County Highway Department, 2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

GREAT! SOONER THE BETTER! THIS PROJECT IS
NEEDED (AND HAS BEEN NEEDED FOR YEARS) FOR THE
FUTURE GROWTH OF THE CITY, GREENE AND
CHRISTIAN COUNTIES.

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: CHARLES READINGER

Email: WHISPERING OAKS BB @ SBC GLOBAL .NET

Please return comments to: Adam Humphrey, PE, Greene County Highway Department,
2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension
Environmental Assessment document:

a very necessary project -
Start as soon as possible
Cox Rd. cannot handle the amount of traffic
it now has. Also the speed limit needs
to be lowered to 30 MPH to get the
traffic to go 40 MPH.



COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: Lisa Lewis

Email: larmerlewis@gmail.com

Please return comments to: Adam Humphrey, PE, Greene County Highway Department, 2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

They need to put a stoplight
at FR 190 and FR 141 to allow
residents of Rivercut to travel
North onto FR 141.

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: Aaron Bruton

Email: aarbruton@aol.com

Please return comments to: Adam Humphrey, PE, Greene County Highway Department,
2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension
Environmental Assessment document:

- 1 The sound study is and will be false data. The bridge forecasted to be built north of Plainview Road will be in the center of a canyon/waterway. This will only funnel noise south through the creek bottom.
- 2 The safety of having a stop sign/signal at the bottom of a large hill west bound on Plainview will cause several accidents.
- 3 Why in the world would you not expand Campbell to three lanes instead of creating an entire new roadway through so many of our back yards. This is every poor project and should be strongly reconsidered.

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: S. Trombold

Email: walstro@att.net

Please return comments to: Adam Humphrey, PE, Greene County Highway Department,
2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension
Environmental Assessment document:

The southern end is the proverbial
"road to nowhere" and appears to accomplish
very little. That stretch certainly does
not unload Campbell. The 190 strip
between ~~141~~ 141 and 143 looks like "we
had to stop somewhere." 141 through
the river corkscrew is a poor southern feed/
outlet. Has there been any consideration
to taking 143 south of the river, then
connect up to 141?

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: Michael J. Batchelder

Email: mjb1tcare@sbaglobal.net

Please return comments to: Adam Humphrey, PE, Greene County Highway Department, 2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

Please consider moving the road way
farther west of Lennox Place subdivision.
There is a "wetland" that would impact
the rerouting, but the "wetland" may
actually be an old pond. If the original
dam for the pond is removed (the pond is
owned by the county), the wetland
may go away. Problem solved.

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: Vickie Batchelder

Email: vickie.batchelder@gmail.com

Please return comments to: Adam Humphrey, PE, Greene County Highway Department,
2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension
Environmental Assessment document:

My address is 1809 W. Lennox Dr. We are wondering about the possibility of taking the road out away from the neighborhood a bit. It would take the curve out of the road, thereby shortening the road and possibly alleviate the need for a sound wall.

We have been advised that one consideration in not moving the road out farther is a wetland to the east of us. We are aware of the area and are also fairly confident there is a manmade dam built there for the purpose of making it a pond. We are unaware if there is a natural spring, but if not, then would the wetland dry up if the dam is removed?

Finally, is it possible for impacted residents like us, to know the results of the sound study, like what the DB rating is predicted to be and be able to compare it to other areas of town?



COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: Darrell Riemann

Email: darrellriemann@att.net

Please return comments to: Adam Humphrey, PE, Greene County Highway Department, 2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

It look like a good project. It should release
some of the traffic off of South Campbell

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: Mohan Tummala

Email: mohantummala@hotmail.com

Please return comments to: Adam Humphrey, PE, Greene County Highway Department, 2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

- Long term benefits of this planned 4 way lane is unclear since the south end of this project comes to abrupt end
- No clear vision in connecting this project with Nixa.
- Noise pollution/Smoke pollution from this project will likely effect health & well being of communities esp living adjacent to this project.
- Huge expense for this project looks unwise compared to perceived benefits when no plans shown connecting this to Nixa area with 4 lane roads.
- This project looks most likely has quite a few downsides in terms of value generated compared to any long term benefits
- Would like to see how this is justified when it is going through so many residential areas with no commercial/business future



COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: Jeff Rowe

Email: jeffrowe1028@gmail.com

Please return comments to: Adam Humphrey, PE, Greene County Highway Department, 2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

Try to keep it as scenic and tree-lined as possible.
How many trees are you going to have to cut down?
It looks like the property at the start where
Kansas 'T' intersects with Republic Road is
for sale - there is a commercial real estate sign
there. How close are you to purchasing that?

Will this extension eventually connect to the
East-West Arterial corridor in Southern Greene Co?
How far off in the future is that?

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: Richard McKie

Email: MOOSE 8688 @ hotmail .com

Please return comments to: Adam Humphrey, PE, Greene County Highway Department, 2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

Road Noise Barrier
my lot backs up to the intersection at weaver
and the new extension. according to your noise
abatement there is no barrier at the intersection

The noise from stopping and acceleration at
the intersections far exceeds traveling down
the road to lot.

There must ~~be~~ be a noise barrier
near the intersection north & south

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: Todd Skornia

Email: tskornia@mac.com

Please return comments to: Adam Humphrey, PE, Greene County Highway Department, 2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

- (*) - No Greene Co. revenue is achieved with this route
- (*) - For 2 yrs under this plan Weaver will be a nightmare road only to end back at Campbell Ave.
- (*) - FF Hwy. would be much more beneficial to separate traffic, raise commerce & much less of a disruption to established neighborhoods.
- (*) - expansion of Cox Rd would have made much more fiscal sense if an easterly route needed to be chosen
- (*) - do not believe that the wild life (cave fish, bats) will not be affected

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: Mitch Wilson

Email: mdwilson56@gmail.com

Please return comments to: Adam Humphrey, PE, Greene County Highway Department,
2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension
Environmental Assessment document:

I would ^{like for} this project to be stopped and other
alternatives considered such as ~~improve~~
improving Hwy FF.

I feel this proposed extension of Kansas Expressway
will bring more traffic & noise to this entire
corridor. Terminating the road at Cox road just
north of the James River poses problems for
those going to Nixa via Nicholas Road and
puts a heavy burden on the twin bridges.

This road would provide opportunities for
further development along this corridor which
most of us living in this area are
opposed to.

The noise study that was referenced doesn't seem
to be realistic.

Thanks

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: JANE PAUL

Email: janickpaul@yahoo.com

Please return comments to: Adam Humphrey, PE, Greene County Highway Department,
2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension
Environmental Assessment document:

THIS MAY HAVE BEEN A GOOD IDEA 30 years ago, but it is NOT
THE MOST LOGICAL WAY TO SEND TRAFFIC SOUTH.

SPRINGFIELD'S POPULATION HAS MOVED MORE WEST THAN
ANTICIPATED 30 years AGO — WEST OF COX RD.

TO PUT A 2 LANE ROAD FOR 2 years TO DEMO INTO
WEAVER ONLY CAUSED MORE CONGESTION WHICH THEN WILL
SEND VEHICLES EAST OR WEST ON WEAVER — A DANGEROUS
ROAD IN ITSELF WHERE MANY DEATHS HAVE OCCURRED.

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: Marilyn Davis

Email: davis1m@sbcgldbal.net

Please return comments to: Adam Humphrey, PE, Greene County Highway Department,
2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension
Environmental Assessment document:

We have a very large amt of crime in our neighborhood now. This is very troubling to think what will be added due to increase in traffic + pedestrians. Especially since it is "not feasible or reasonable" for even a wall barrier.

Where does this road lead to?

Additionally, I see your studies but ^{one on the} we purchased our home because of the wildlife. I know without a doubt this will decrease!

This is putting a bunch of commercial bldgs in the middle of several residential areas.

Very very sad ☹️.



COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: LARRY DAVIS

Email: DAVISLM LARRY D GMAIL.COM

Please return comments to: Adam Humphrey, PE, Greene County Highway Department, 2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

PLEASE Do NOT ALLOW A ^{DEVELOPER} ~~DEVELOPER~~ TO BUY
THE 10 ACRES LOT. THE SUBDIVISION SHOULD
BE ALLOW TO BUY AT A FAIR PRICE. THE LAND
WOULD BE USE FOR COMMON AREA ONLY.

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: JEFF BRUTON

Email: jeffb7777@outlook.com

Please return comments to: Adam Humphrey, PE, Greene County Highway Department,
2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension
Environmental Assessment document:

Several reasons why we do not want the project
to continue.

Noise - when Cox / Ward bridge went in back
in early 2000 our noise level quadrupled. We here
every vehicles sound echoing through the valley
at all hours.

The traffic level now ~~is~~ not that bad currently
except at normal home time traffic.

The plan does not show a plan why it ends where
it does.

We vote "no" on the whole process.

The environment aspect is huge too! Deer in
our backyard, Coyotes run this area AND lots of
turkeys would be effected too. Hoot overblow in the area
we hear every evening.

"No"

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: JOHN F. BROWN 1667 W. CAMINO, LN.
SPRINGFIELD MO 65810

Email:

Please return comments to: Adam Humphrey, PE, Greene County Highway Department,
2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension
Environmental Assessment document:

I HAVE HAD 9' OF WATER IN MY BACK
YARD,
WHY TIE IN TO FR 145? IT IS ALREADY
A RACE TRACK!

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: Jim FISHER

Email: JFISHERSTER@GMAIL.COM

Please return comments to: Adam Humphrey, PE, Greene County Highway Department,
2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension
Environmental Assessment document:

As GREENE Co. CITIZEN, I GREATLY APPRICATE THE
DILIGENCE THE ROAD DEPT. IS TAKING IN THIS, WITH
WORKING WITH FHWA/STATE & CITY. THIS ROAD IS
BADLY NEEDED. THE "SOUTHERN METRO" IS LACKING
A CONNECTED NORTH-~~THE~~ SOUTH CORRIDOR, WHICH IS
MAKING CAMPBELL AVE AND THE FARM ROADS
DANGEROUS. THE DILIGENCE ^{& FORESIGHT} THE COUNTY HAS
EXERCISED W/ RIGHT-OF-WAY LAND IS GOOD AND
HAS MADE THIS JOB POSSIBLE. IT SEEMS THAT
THE COUNTY IS DOING IT RIGHT, LOOKING AHEAD AT
POSSIBLE ENVIRONMENT CONCERNS, ETC.

GET IT BUILT!

THANK YOU.

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name:

Roger Hedgepeth

Email:

P4175@YAHOO.COM

Please return comments to: Adam Humphrey, PE, Greene County Highway Department, 2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

*County took our house and land and
dredged our home down. I live at 1513
W. Blakey St. Proposed hwy will be within
50 yds of our home. All other homes
show a sound wall except mine.
It is not fair, we suffered the
brunt of the highway project, all it is
only fair that we receive a sound
wall also*

Roger Hedgepeth

860-6562

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

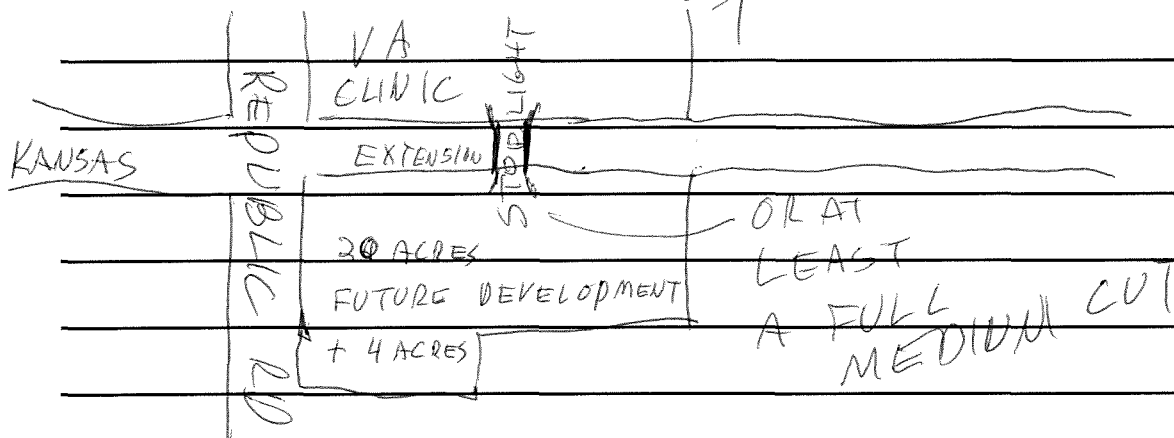
Name: BARBARA BEYER

Email: barbarabeyer@sbcglobal.net

Please return comments to: Adam Humphrey, PE, Greene County Highway Department,
2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension
Environmental Assessment document:

I'm excited that this is moving forward!
I realize there is actual design, rather than
concept, still to be done. I would
like to see a stop light about halfway
down Kansas Extension by the
VA clinic ^{on the} east side the land to be developed
on the west side.



COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: Mark Coble

Email: m.coble@sbcglobal.net

Please return comments to: Adam Humphrey, PE, Greene County Highway Department,
2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway Extension
Environmental Assessment document:

Many residence that live in English Oaks purchased their home because of the wooded areas around them. It is of great concern as to what will happen to all of the trees, especially at the intersection of Kansas & Republic on the South West corner extending south along the new extension. The fear is that all of the trees will be removed in favor of Commercial property, creating a poor visual to these home owners along with the added noise of traffic without the buffer of the trees.

Any info in regards would be much appreciated. Any info received will be passed on to residence in this subdivision with common concerns

Thank again,

Mark Coble

417-818-2817

Samuelson, Kathryn A (Kate)

From: Herleth, Michael
Sent: Wednesday, March 15, 2017 3:54 PM
To: Samuelson, Kathryn A (Kate)
Cc: Thornhill, Steve
Subject: FW: Kansas Expressway EA Appendix G
Attachments: Appendix G - Geological Study.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Kate, please add to the FONSI correspondence file. thanks

From: Adam Humphrey [mailto:AHumphrey@greencountymo.gov]
Sent: Wednesday, March 15, 2017 9:18 AM
To: Bachle, Peter <peter.bachle@dnr.mo.gov>
Cc: Herleth, Michael <mherleth@burnsmcd.com>; DeBacker, Michael <mdebacker@burnsmcd.com>
Subject: RE: Kansas Expressway EA Appendix G

Hello Peter,

I've attached a pdf copy of Appendix G to this email, as per your request. My apologies for any technical issues that you experienced while attempting to access this data via our website. The file size of the Appendices document is rather large and it takes a little while to complete the entire download of the online document (approximately 110MB). If you need anything additional, please don't hesitate to let me know.

Thank you!

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

From: Bachle, Peter [mailto:peter.bachle@dnr.mo.gov]
Sent: Tuesday, March 14, 2017 1:27 PM
To: Kansas Extension <KansasExtension@greencountymo.gov>
Subject: Kansas Expressway EA Appendix G

Mr. Humphrey,

I am reviewing the Kansas Expressway Extension EA. The web link to Appendix G Geological Study will not open. Would you be able to make an electronic copy available?

Thank you,
Peter Bachle
Geologist II
MDNR-Missouri Geological Survey
573-368-2472

JM

Keri & Matt Marke
5343 S. Westwood Ave.
Springfield, MO
65810

UNDELIVERED NO. 6583

16 MAR 2007 PM 3 L



Adam Humphrey, PE
Greene Co, Highway Department
2065 N. Clinton
Springfield, MO. 65803

65803-210665



COMMENT CARD

We want your input



To receive updates on the project, please provide your name and email address:

Name: Matt Marske

Email: matthewmarske@gmail.com
5343 S. Westwood Ave, Springfield, MO

Please return comments to: Adam Humphrey, PE, Greene County Highway Department, 2065 N. Clifton, Springfield, MO 65803 by April 7, 2017.

Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment:

I have some concerns with information in the
Environmental Assessment report and wanted to cross
reference that information with the specific studies
in question. However, the link you provide on line
to the Environmental Assessment-Appendices does
not work. It will be impossible to speak
specifically about some of the associated concerns
at the Public Hearing on March 23 without
access to this information.

Please correct immediately, forward me copies of
the Appendices and delay the hearings until the
information is provided to the public!

Samuelson, Kathryn A (Kate)

From: Herleth, Michael
Sent: Monday, March 20, 2017 3:18 PM
To: Samuelson, Kathryn A (Kate)
Subject: FW: Kansas Extension Project - Public Comment to Environmental Assessment
Attachments: 03-20-17 Matt Marske Comments.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

FONSI file.

FYI – the comment period will be extended 15 days to April 22 per discussion between Greene County, MoDOT and FHWA. thanks

From: Adam Humphrey [mailto:AHumphrey@greencountymo.gov]
Sent: Monday, March 20, 2017 1:06 PM
To: matthewmarske@gmail.com
Subject: Kansas Extension Project - Public Comment to Environmental Assessment

Hello Mr. Marske,

I wanted to reach out to you and confirm that I received your public comment form in the mail today regarding the Environmental Assessment (EA) report for the Kansas Extension roadway project here in Greene County. In your comments, you noted that you had experienced technical issues while attempting to access the “Appendices” document for the EA report via our online web link during a recent attempt. It is my understanding that this web link was not functioning correctly for a couple of days last week, but was repaired/restored on Wednesday (3/15) afternoon.

If there’s any specific appendix report information that you’d like for me to send you, please let me know and I’ll be happy to email you a copy, or you can also come by and pick up a CD of the entire Appendices from our office. The full version is available on our website at the following link (<https://greencountymo.gov/files/file.php?id=30495>), or you are welcome to view the full printed hardcopy versions of the report which have been made available at all of the following public locations for residents to review:

- Greene County Courthouse
- City of Springfield City Hall
- MoDOT District Office – Springfield
- The Library Center – Springfield
- Springfield City Utilities
- Christian County Courthouse
- City of Nixa City Hall

I hope that you’ll be able to join us for the upcoming Public Open House meeting this Thursday (3/23) from 6pm to 8pm at Wanda Gray Elementary School. In the meantime, please don’t hesitate to contact me (829-6536) if you have any questions or if I can assist with any other questions.

Sincerely,

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

COMMENT CARD

We want your input

To receive updates on the project, please provide your name and email address:

Name: Michael R. Pike

Email: OZARKmtnc@aol.com

Please return comments to: Adam Humphrey, PE, Greene County Highway Department, 2065 N. Clifton, Springfield, MO 65803 by April 22, 2017.

Please provide any comments you have about the Kansas Expressway-Extension Environmental Assessment document:

The freeway extension of Kansas is long overdue. I live nearby on 139. I see the road lines up with 141, to meet Cox Road. I have noticed a steady increase in traffic. People leaving River Cut go North on 139. Will the intersection be 4 way or signalized. The traffic coming down the hill on Cox Road at speed + when slick seems to be an issue

Will the intersection of Plainview + Kansas Expressway be signalized?

If construction begins in 2018 do you plan to open it in stages as completed? I know you plan to complete 1 lane first

Will construction require closing Weaver Road?

Mike

Samuelson, Kathryn A (Kate)

From: Doll, Maggie H
Sent: Wednesday, March 29, 2017 11:39 AM
To: Samuelson, Kathryn A (Kate); Herleth, Michael; DeBacker, Michael; Beam, Steven R
Cc: Bender, Camden J
Subject: FW: Kansas Extension Project - Michael Pike Public Comments
Attachments: 03-29-17 Michael Pike Comments.pdf

FYI...EA comment

From: Adam Humphrey [mailto:AHumphrey@greenecountymo.gov]
Sent: Wednesday, March 29, 2017 11:37 AM
To: ozarkmtnc@aol.com
Subject: Kansas Extension Project - Michael Pike Public Comments

Hello Mr. Pike,

I wanted to confirm that our staff has received the public comment card (attached to this email) that was mailed to our office regarding the Kansas Extension project here in Greene County. Please know that we greatly appreciate you taking the time to provide us with your input regarding this transportation improvement project.

Within your comments, there were a few questions that you had asked about. I wanted to offer the following responses to your inquiries to help provide some additional clarification regarding the proposed design and construction of this roadway project:

Question #1: Will the intersection of Plainview & Kansas Expressway be signalized?

Answer: Our final design of this intersection will ultimately be determined based upon the anticipated traffic volumes that are expected to occur in 2018, as well as the traffic volumes that we might expect to see within the next 10 to 20 years along the new Kansas Expressway corridor. In order for an intersection to be signalized, there are some very specific "warrants" that must be met before our federal design guidelines would justify installing a signal. Our design team has not yet completed a full traffic engineering analysis of the new intersections to determine what the appropriate traffic control measures will be. My best guess at this point would be that, initially, this intersection would not likely meet the required warrants for a traffic signal and would simply be controlled by stop signs on the sidestreet (i.e. Plainview Rd) – somewhat similar to the nearby intersection at Plainview & Cox Rd. In any case, we will definitely be designing these new intersections in a manner that would allow for a future traffic signal to be installed if/when the traffic volumes increase to the extent that a signal is required.

Question #2: If construction begins in 2018, do you plan to open it in stages as completed?

Answer: There are several possible options at this point in time regarding the potential "staging" of the construction for the new roadway. One option would be to construct the new corridor in three (3) separate stages. Under this option, we would likely build the segment from Republic Road to Weaver Rd as the first stage. Next, we would build the segment from Weaver Rd to Plainview Rd as the 2nd stage. Finally, we would then construct the segment from Plainview Rd down to FR 190 as the final stage. Under this staging concept, we would open the completed roadway segments to motorists as work progresses from north to south along the new corridor. Another possible option might be to build the entire roadway in one major project. Using this construction approach, it would be more likely that the new roadway would remain closed to traffic until the entire project is completed and ready to open to traffic. Ultimately, our construction staging will be largely based upon the available construction funds that Greene County can allocate

towards the project. Until final design is completed and we have some updated cost estimates for the new roadway, we probably won't be able to make a definite determination on this matter.

Question #3: Will construction require closing Weaver Road?

Answer: At this point, I don't foresee any construction issues that would require a complete closure of Weaver Road for any significant period of time. Our approach would be to try and keep all of these existing roadways functional while the new Kansas Extension corridor is being constructed in order to minimize the traffic impacts on local motorists. I would estimate that, if temporary closures are necessary, it would only be for very short periods of time to allow for construction operations that might occur at the new intersections.

I hope that this information helps to address some of the questions that you have regarding this project. Please feel free to call (829-6536) or email me if there's any other information that we can assist with. Thanks again for providing us with your input and feedback on our project.

Sincerely,

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

Samuelson, Kathryn A (Kate)

From: Doll, Maggie H
Sent: Wednesday, March 29, 2017 11:37 AM
To: Samuelson, Kathryn A (Kate); Herleth, Michael
Subject: FW: funding - kansas expressway extension

Forwarding comments received.

From: DeBacker, Michael
Sent: Monday, March 27, 2017 8:40 PM
To: Bender, Camden J <cjbender@burnsmcd.com>; Beam, Steven R <srbeam@burnsmcd.com>; Doll, Maggie H <mhdoll@burnsmcd.com>
Subject: Fwd: funding - kansas expressway extension

FYI

Mike

Begin forwarded message:

From: Adam Humphrey <AHumphrey@greencountymo.gov>
Date: March 27, 2017 at 2:09:09 PM CDT
To: "timsconfig@gmail.com" <timsconfig@gmail.com>
Subject: RE: funding - kansas expressway extension

Hello Mr. Scott,

The Kansas Expressway Extension project is being administered by the Greene County Highway Department as a federal transportation improvement project. This means that our department is following federal project requirements, with oversight by the Missouri Department of Transportation, in order to utilize federal surface transportation funding for the design and the construction of the proposed Kansas Extension corridor. Eighty percent (80%) of the total project cost will be eligible to be paid for using federal transportation funds. The remaining twenty percent (20%) of the total project cost will be paid with local transportation funds by the County.

Over the past 3 fiscal years (FY2014-FY2016), the Greene County Highway Department has been setting aside a portion of our local transportation dollars in preparation for the future construction cost of this transportation project. At the present time, we have set-aside a total of \$6 million dollars to be used towards the delivery of this public improvement. We estimate that the total cost of the proposed project (new 2 lane roadway from Republic Rd. down to FR 190) will be approximately \$30 million. However, until we have a completed final engineering design of the proposed roadway corridor, it's very difficult to estimate the total project cost with great precision.

For the last 12 months, our engineering work has been solely focused on compiling and analyzing environmental impact data in order to meet the required federal environmental policy guidelines for this project. Once we have completed this environmental review process, our engineering focus will shift towards the detailed design of the roadway, itself. These design details will help us to make a final determination regarding the most appropriate manner of staging the construction, and will help to establish an accurate estimate of cost over the duration of the roadway construction.

I hope that this information is helpful in addressing your inquiry regarding the cost and funding for this transportation project. Please feel free to contact me if you have additional questions regarding the project.

Sincerely,

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

From: Web Contact
Sent: Thursday, March 23, 2017 1:47 PM
To: Kansas Extension <KansasExtension@greenecountymo.gov>
Subject: funding - kansas expressway extension

Someone has a question or comment for your office or department.
This is a system generated email.
Please do not reply to it.

Name: Tim Scott
Email: timscott.email@gmail.com
Subject: funding - kansas expressway extension
Request Follows:
I cannot locate on your future projects webpage any reference to how this project will be paid. Please reply with detail on what budget is committed, what is planned, etc.



Samuelson, Kathryn A (Kate)

From: Doll, Maggie H
Sent: Wednesday, March 29, 2017 11:38 AM
To: Samuelson, Kathryn A (Kate); Herleth, Michael
Subject: FW: Access to Kansas Extension

Forwarding comments received.

From: DeBacker, Michael
Sent: Monday, March 27, 2017 8:23 PM
To: Bender, Camden J <cjbender@burnsmcd.com>; Beam, Steven R <srbeam@burnsmcd.com>; Doll, Maggie H <mhdoll@burnsmcd.com>
Subject: Fwd: Access to Kansas Extension

For our records...

Mike

Begin forwarded message:

From: Adam Humphrey <AHumphrey@greencountymo.gov>
Date: March 27, 2017 at 3:46:20 PM CDT
To: "lebarch@aol.com" <lebarch@aol.com>
Subject: **RE: Access to Kansas Extension**

Good afternoon Mr. Bussey,

I wanted to respond and confirm that I've received your email correspondence below regarding the proposed Kansas Extension project.

Presently, the focus of our recent engineering efforts have been to assess the overall environmental impacts that would result from the future construction of this proposed roadway improvement project. The purpose of this environmental assessment work is to ensure that our proposed transportation solution offers the minimal adverse impacts to the environment as is deemed possible, and to ensure that this public improvement compiles with all required aspects of the National Environmental Policy Act. In doing so, we have utilized the preliminary design plans that were developed back in 2003 by Greene County as a guiding document since those plans identified the proposed alignment and connectivity of this future roadway corridor. As you are probably aware, those preliminary design plans identified a full-access roadway connection to be made between the new Kansas Expressway Extension corridor and the existing Kansas Avenue (FR 145) roadway.

As we move forward into the final design stage of the proposed Kansas Extension roadway, this full-access connection between Kansas Expressway and FR 145 continues to be the concept that we're pursuing in the proposed roadway design. Our region's Major Thoroughfare Plan, as developed and adopted by Ozarks Transportation Organization (OTO), is consistent with this proposed roadway access which would someday allow for a future connection to also be made between Quail Creek subdivision and the existing Kansas Ave (FR 145). Since that roadway segment would fall within the city limits of Springfield, any future connection to be made between Quail Creek and FR 145 would be determined by the City of Springfield.

I hope that this information is helpful in addressing your inquiry and comments related to the proposed Kansas Extension project. Please feel free to contact me if I can be of any additional assistance to you regarding this project. Thanks for sharing your input with our project team.

Sincerely,

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

From: lebarch@aol.com [<mailto:lebarch@aol.com>]

Sent: Thursday, March 23, 2017 7:41 PM

To: KansasExtension@greencountymo.gov.

Subject: Access to Kansas Extension

Sirs -

I support the Kansas Extension, but only with the proviso that a complete cross-road connection (full access across any divider) be established where said extension going south curves into "old Kansas" approximately at .

A sensible connection there would serve the land to the east (currently zoned city residential), and eventually by an easterly extension to the Quail Creek subdivision.

Without a connection at the point mentioned, traffic would be forced to drive north to Republic Road.

Regards -
Lewis Bussey

Samuelson, Kathryn A (Kate)

From: Doll, Maggie H
Sent: Wednesday, March 29, 2017 11:38 AM
To: Samuelson, Kathryn A (Kate); Herleth, Michael
Subject: FW: Kansas Expressway Extension - Ward Branch Walking Trail Inquiry
Attachments: Kansas Extension Project Public Hearing Display Boards.pdf; ATT00001.htm; Public Comment Card.pdf; ATT00002.htm

Forwarding comments received.

From: DeBacker, Michael
Sent: Monday, March 27, 2017 8:35 PM
To: Bender, Camden J <cjbender@burnsmcd.com>; Beam, Steven R <srbeam@burnsmcd.com>; Doll, Maggie H <mhdoll@burnsmcd.com>
Subject: Fwd: Kansas Expressway Extension - Ward Branch Walking Trail Inquiry

FYI....

Mike

Begin forwarded message:

From: "Adam Humphrey" <AHumphrey@greencountymo.gov>
To: "oldjimh@centurytel.net" <oldjimh@centurytel.net>
Subject: Kansas Expressway Extension - Ward Branch Walking Trail Inquiry

Hello Mr. Hardy,

I received your inquiry below regarding the Kansas Extension project and wanted to provide you with some updated materials from last Thursday's public hearing. As you may already be aware, the focus of our latest public hearing was to present environmental impact data that has been collected and analyzed along this proposed Kansas roadway corridor. The intended purpose of this data is to help our design staff identify any adverse impacts associated with the proposed construction of the Kansas Extension roadway project, and to determine what methods can best be utilized to avoid or mitigate those impacts to the environment and to the residents that live adjacent to this planned roadway. I have attached some copies of the information that was on display during Thursday's meeting for additional reference – including a public comment form that can be filled out and returned to our office **(by April 22nd deadline)** with any input that you'd like to provide to our design team.

In terms of the existing Ozarks Greenways walking trail along the Ward Branch, there are no adverse impacts to this existing trail that were identified during our environmental assessment of the Kansas Extension corridor. There were, however, some potential benefits identified from a pedestrian trail/access perspective, resulting from the future construction of the new roadway corridor. The primary benefit would be the opportunity for us to connect the existing trailhead access that is located at Plainview Road (just east of Wanda Gray Elementary School) with the new pedestrian access that is planned along the entire length of our proposed Kansas Extension roadway corridor. Also, in order to protect the future connectivity of the Ward Branch trail heading northeast of our roadway project, we will be taking necessary precautions to ensure that the future trail will not be impacted by our roadway improvement design.

I hope that this information helps to address your questions regarding the Ward Branch walking trail. Please feel free to email or call (829-6536) me if you have additional questions that you'd like to discuss. Thanks for providing us with your input regarding this public improvement project.

Sincerely,

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

From: old jim and Fair Anne Hardy [<mailto:oldjimh@centurytel.net>]
Sent: Friday, March 24, 2017 10:02 PM
To: Bender, Camden J <cjbender@burnsmcd.com>
Subject: Re: Reminder: Greene County Kansas Extension Public Hearing

I regret i was unable to attend. Medical troubles.

Would you send minutes, or a link to them?

We're really curious about the walking trail along Ward Branch.

Thanks,

old jim (James) Hardy

Samuelson, Kathryn A (Kate)

From: Doll, Maggie H
Sent: Wednesday, March 29, 2017 11:39 AM
To: Samuelson, Kathryn A (Kate); Herleth, Michael
Subject: FW: Kansas Extension Inquiry

FYI

From: Adam Humphrey [mailto:AHumphrey@greenecountymo.gov]
Sent: Wednesday, March 22, 2017 10:11 AM
To: glabrune@larsonjd.com
Subject: RE: Kansas Extension Inquiry

Hello Greg,

I wanted to reach out and let you know that I had received your comments below regarding the proposed Kansas Expressway Extension project. As you may already be aware, the Greene County Highway Department is hosting a public hearing tomorrow evening at the Wanda Gray Elementary School from 6pm to 8pm to present some new information that has been gathered regarding this project. One of the items that is addressed within our public information is a summary of the various transportation project alternatives that have been considered over the last 30+ years in an effort to find the “best fit” solution to address our emerging transportation system needs in this area. Expansion of Cox Road is one of the concepts that’s been looked at in the past, but was ultimately ruled out as the best option for some of the following reasons:

- Cox Road was designed and constructed to operate as a “Secondary Arterial” classification of roadway. Because of this classification, you will note that there are a large number of residential and commercial driveways that have been constructed with direct access to this roadway. In many cases, the spacing between those access points is rather limited. In order for Cox Road to operate in a manner that would be consistent with the type of facility that we are proposing to construct in the Kansas Extension project, a large number of those existing driveway accesses would need to be eliminated to allow for traffic to flow appropriately – similar to the configuration that you see currently along the existing portions of Kansas Expressway within the urban areas of Springfield. In most cases, the only way to eliminate those access points along Cox Road is to buy-out the homes and eliminate them.
- Cox Road was constructed within about a 60-ft wide right-of-way corridor. The right-of-way width that has been preserved over the years for the future Kansas Expressway corridor is 110-feet wide, which is the typical standard for a Primary Arterial classification of roadway in Greene County. This additional right-of-way width is critical for constructing a full 4-lane roadway with travel lanes that are separated by a grass median and pedestrian sidewalk/trail access along the length of the corridor. In order to achieve this same type of design standard along the existing segments of Cox Road, we would be purchasing and demolishing a large number of homes along the corridor due to the limited right-of-way width.
- There is a tremendous amount of existing utilities (gas, water, sanitary sewer, phone/fiber optic cable) in addition to the existing fences, sidewalks, utility poles, and other fixed objects adjacent to the existing roadway that would have to be removed and/or relocated in order to accommodate the construction of a roadway like the Kansas Expressway Extension. The cost and time required to relocate all of these existing underground and overhead utilities would be extraordinary and could potentially be greater than the cost of the roadway, itself.

Based upon all of the various factors that have been considered over the years, and based heavily upon the public’s input that has been gathered since the time that Greene County began looking at transportation options, we’ve determined that the proposed extension of Kansas Expressway provides the greatest benefit with the least possible

negative impacts to the region. I hope that this information is helpful in explaining at least some of the reasons that have led our region's planners and our department towards the construction of this proposed transportation improvement project over the years.

I hope that you'll be able to join us for the public hearing open house tomorrow evening. Thanks for sharing your project comments and input with our staff. Please feel free to call or email me if you have any additional questions.

Sincerely,

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

From: Web Contact
Sent: Tuesday, March 21, 2017 1:27 PM
To: Kansas Extension <KansasExtension@greenecountymo.gov>
Subject: Extension

Someone has a question or comment for your office or department.
This is a system generated email.
Please do not reply to it.

Name: Greg La Brune
Email:
Subject: Extension
Request Follows:

I live in Woodfield Park, near the expansion, and am very concerned about the green space lost simply for another road. I'm curious why a simple solution can't be found, like expanding Cox Road south of Republic Road to 4 lanes instead of 2? Most of this added traffic involves the Rivercut neighborhood.
Regards, Greg



To: Adam Humphrey

From: Paul McCune *movingwaters@gmail.com*

Subject: Questions and concerns regarding design of Kansas Expressway Corridor

I am a property owner in Greene County who owns land bordering the proposed Kansas Expressway corridor. My land parcel which borders the corridor is #881815402218. My home is located on parcel #881815402056, which lies directly to the east and accesses the present Kansas Avenue. For reference, it is located about halfway between Republic Road and Weaver Road to the west of Kansas Avenue.

I have several questions that I would like to present for clarification:

Where will drainage from Kansas Expressway be directed from directly above (and west) of my property? Will it be channeled directly into Workman's Branch or will it drain across any portion of my property?

What type of fence or barrier will exist along the corridor right of way? Will it offer us security?

Will the corridor be provided with sidewalks or walking paths on one or both sides of the expressway?

Since only one two lane road will be constructed initially, which set of lanes will it be, the east or west set of lanes?

Will the passage over Workman's Branch be a bridge or just a box culvert? If a box culvert, how will it be guaranteed that water will not back up during a major flood event? Please be advised that water has backed up and overflowed several times in recent years over Kansas Avenue, which is only one of the two branches of Workman's Branch. Our home is located in which has become the flood plain of Workman Branch. We do not want further flooding threats as a result of the new corridor. We would ask that maximum flood release provisions be made where this corridor crosses Workman Branch.

How will affected property owners be notified for opportunities for input as plans are finalized?

Samuelson, Kathryn A (Kate)

From: Doll, Maggie H
Sent: Monday, April 03, 2017 9:24 AM
To: Samuelson, Kathryn A (Kate); Herleth, Michael; DeBacker, Michael; Beam, Steven R; Hurt, David
Subject: FW: Kansas Extension Project - Design Questions/Comments
Attachments: 03-30-17 Paul McCune Design Questions.pdf

FYI

From: Adam Humphrey [mailto:AHumphrey@greenecountymo.gov]
Sent: Friday, March 31, 2017 2:45 PM
To: movingwaters@gmail.com
Subject: Kansas Extension Project - Design Questions/Comments

Good afternoon Mr. McCune,

I wanted to follow-up with you and confirm that I received your letter in the mail yesterday regarding the Kansas Extension project in Greene County. In your correspondence, you inquired about several specific design aspects of the proposed roadway project, and I wanted to provide you with some additional information to help address your questions.

As you and I briefly discussed during our conversation at the public hearing, the majority of the “final design” details for this project remain unfinished at the current time. Once our project team has finalized all of the Environmental Assessment requirements for this project, we will then begin the process of working on the actual design details of the roadway. At the present time, we do have a set of preliminary design plans that were compiled back in 2003 which provides us with a general concept of what the proposed roadway alignment and profile might look like. Using these conceptual plans, I have provided some general answers below to the questions that you’ve asked in your letter.

- 1.) Where will drainage from Kansas Expressway be directed from directly above (and west) of my property? Will it be channeled directly into Workman’s Branch, or will it drain across any portion of my property?

Answer: The preliminary plans identified the design of a 4-ft wide flat-bottomed ditch along the east side of the new roadway which would carry storm water from north to south along the new right-of-way adjacent to your property. This drainage would be carried along the east side of the right-of-way down to the Workman Branch crossing where it would then pass underneath the roadway by means of a large box culvert structure. Ultimately, all of that drainage area ends up emptying directly into the Workman Branch waterway. The preliminary plans show the new roadway being constructed in a “cut” as it passes by your property, meaning that it would be lower than the existing ground profile. Therefore, the drainage would be directed towards the new roadway ditches, not towards your property.

- 2.) What type of fence or barrier will exist along the corridor right-of-way? Will it offer us security?

Answer: At the present time, there are no plans to install any type of continuous fencing or barriers along the entire length of the new roadway for privacy or security purposes. Generally speaking, unless the construction of a roadway improvement project requires the removal or relocation of a resident’s existing fence, we do not construct any fencing along the boundaries of Greene County roadways. You probably noticed during the recent public hearing that there are a couple of specific locations that were identified during the Environmental Assessment as potential sites for sound barrier installations. Those sites will be further evaluated during final design, and a barrier may be designed to reduce sound impacts for residents in some very specific locations, as required by federal guidelines.

3.) Will the corridor be provided with sidewalks or walking paths on one or both sides of the expressway?

Answer: Our current design concept would include the construction of new pedestrian sidewalks/trails along both sides of the new roadway corridor. Here is a web link to our project animation video which shows the proposed pedestrian paths along both sides of the future 4-lane roadway: https://www.youtube.com/watch?v=Bk7qsadN_jl

4.) Since only one 2-lane road will be constructed initially, which set of lanes will it be, the east or west set of lanes?

Answer: That's a great question, and we don't have an answer for it just yet. This will be one of the critical design elements that our team will be working on once we begin the final design process. The answer to this question will largely be determined based upon our cost estimates, construction staging decisions, and earthwork quantities.

5.) Will the passage over Workman's Branch be a bridge or just a box culvert? If a box culvert, how will it be guaranteed that water will not back up during a major flood event?

Answer: The preliminary plans identified the construction of a double box culvert to accommodate this new roadway crossing. Both of the boxes were sized at approximately 15-feet wide x 9-feet tall. These proposed drainage structures will be re-evaluated during the final design process to determine that they have been sized appropriately to handle a major storm event. Greene County design guidelines require our engineer to achieve what is known as a "no-rise certification" for the design of these drainage structures. What this means is that they must provide us with drainage calculations and hydraulic models showing that their proposed design will result in less than 0.01-feet of rise in upstream flood elevations during a 100-year storm event. This certification process protects both the county and the general public by ensuring that our proposed improvements will not adversely impact conditions upstream of the project site.

6.) How will affected property owners be notified for opportunities for input as plans are finalized?

Answer: We will continue to provide project updates to the public via our project email list, and by posting public advertisements for any future public meetings. Once our design team has made adequate progress into the final design details of the project, we'll be scheduling another public meeting/hearing to present the updated design information and to collect additional comments/feedback from the public. In the meantime, any other project related comments/questions can always be directed to our staff via the Greene County Highway Department website (https://greenecountymo.gov/about/contact_form_now.php?id=130) or by contacting me directly (417-829-6536).

I hope that this information is helpful in addressing several of your project related questions. As we wrap-up the Environmental Assessment process and move further into exploring the final design details of this roadway project, we'll be able to provide you with much better insight into some of these technical design areas. Please feel free to contact me anytime if I can be of further assistance. Also, I want to thank you for taking the time to provide us with your input for this public improvement project.

Sincerely,

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

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KANSAS EXTENSION

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A Project of the

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Greene County, Missouri

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Highway Department

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PUBLIC COMMENTS

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Offered in Conjunction with a

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Community Presentation

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March 23, 2017

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1	I N D E X	
2		PAGE
3	COMMUNITY PRESENTATION INFORMATION	3
4		
5	APPEARANCES	4
6		
7	PUBLIC COMMENTS	
8	By Bryan Saunders	5
9	By Roger Hedgpeth	6
10	By Paul McCune	7
11	By Charles Dischinger	7
12		
13	CERTIFICATE OF REPORTER	9
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KANSAS EXTENSION

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Greene County, Missouri,

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Highway Department

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PUBLIC COMMENTS

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offered in conjunction with a community presentation

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held from 6:00 p.m. to 8:00 p.m. on Thursday,

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March 23, 2017, at the Wanda Gray Elementary School,

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2101 West Farm Road 182, Springfield, Missouri,

15

before KAREN VEST, Registered Professional Reporter,

16

Certified Realtime Reporter, and Certified Court

17

Reporter within and for the State of Missouri.

18

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20

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1 A P P E A R A N C E S

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3 Presenting the Project:

MR. CAMDEN BENDER

4 BURNS & McDONALD

Public Involvement Specialist/Transportation

5 9400 Ward Parkway

Kansas City, Missouri 64114

6 816.844.4432

cjbender@burnsmcd.com

7

Court Reporter:

8 MS. KAREN VEST, RPR, CCR No. 846

MIDWEST LITIGATION SERVICES

9 2422 East Madrid Road

Springfield, Missouri 65804

10 417.877.9700

kvest@midwestlitigation.com

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2 P R O C E E D I N G S

3 IT IS HEREBY STIPULATED AND AGREED that
4 the following public comments may be taken in
5 shorthand by Karen Vest, RPR, CRR, a Registered
6 Professional Reporter, Certified Court Reporter, and
7 Certified Realtime Reporter in the state of
8 Missouri, and afterwards be transcribed into
9 typewriting and a written transcript made thereof.

10 (Whereupon, public comments began
11 at 6:00 p.m. on Thursday,
12 March 23, 2017, with appearances
13 as noted.)

14 * * * * *

15 PUBLIC COMMENT

16 BY BRYAN SAUNDERS:

17 I just want to make a comment regarding
18 the Kansas extension study and the hearing this
19 evening. My wife and I have been in the area for
20 about 20 years, and I know there's different
21 opinions about this. I think most is positive.

22 And I just wanted to contribute with a
23 comment that we would like -- me and my wife would
24 like to see the construction started as soon as
25 possible. We think it will really alleviate a lot

1 of the congestion and traffic.

2 We live in the southwest part of
3 Springfield. We work and live all over the city and
4 see this as a very positive asset to this part of
5 the community.

6 * * * * *

7 PUBLIC COMMENT

8 BY ROGER HEDGPETH:

9 I live at 1513 West Blakey Street,
10 Springfield, basically at the corner of Weaver and
11 Kansas.

12 We've lived there since 1983. Our
13 address used to be 49-N South Kansas Avenue. The
14 county stole our house and dozed it down. We had to
15 get a lawyer to get a halfway decent settlement out
16 of it.

17 When I found -- come here tonight, I
18 noticed all houses along the new proposed road have
19 a privacy or a sound barrier except where my house
20 is.

21 Considering all that we've had to go
22 through, we lost our home. The new highway is going
23 to be within 50 to 60 yards of my house. Why should
24 not I have a sound barrier just like every other
25 person on that street?

1 And that's what I wanted to say.

2 * * * * *

3 PUBLIC COMMENT

4 BY PAUL MCCUNE:

5 We are concerned about what type of
6 security fencing will be installed along the
7 corridor that borders our property. Okay. Our
8 address is 4615 South Farm Road 145. And email
9 address is movingwaters@gmail.com. ZIP code is
10 65814.

11 * * * * *

12 PUBLIC COMMENT

13 BY CHARLES DISCHINGER:

14 One, I think they're going to get a lot
15 more traffic when this is done than they're
16 anticipating.

17 I've lived in the area for 40 years and
18 people now drive around it. So they could take --
19 do their traffic analysis or whatever, but most
20 people are going to go through there.

21 And it's a hell of a lot cheaper to
22 build it all now instead of waiting five, ten years
23 and coming back and redoing it. Do it right the
24 first time. It's a simple philosophy.

25 You know, and I can say when I met her,

1 she lived in Wichita. She took me to -- when
2 I first -- the first few times I went to see her she
3 took me to a place and it was a five-lane street,
4 center left turn lane. Two cow pastures.

5 That was about 15 years ago. It's all
6 commercial now. But they put in the infrastructure
7 first when it didn't cost anything. All they had to
8 do was move cows out of the way.

9 And you know, build it and they will
10 come. You build this, and the people are going to
11 come. So I'm just saying -- I'm trying to save some
12 of my money. It's cheaper.

13 END OF PUBLIC COMMENTS

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1 CERTIFICATE OF REPORTER
2
3 I, Karen Vest, Registered Professional
4 Reporter, Certified Realtime Reporter, and Certified
5 Court Reporter within and for the State of Missouri,
6 do hereby certify that I was personally present at
7 the taking of the proceedings as set forth in the
8 caption sheet hereof; that I then and there took
9 down in stenotype the proceedings had at said time;
10 and that the foregoing is a full, true, and accurate
11 transcription of such stenotype notes so made at
12 such time and place, all to the best of my skill and
13 ability.

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Karen Vest, RPR, CRR,
Missouri CCR No. 846

GREENE CO. HIGHWAY DEPT. PUBLIC HEARING 3/23/2017

A	8:12 city 4:5 6:3 cjbender@bu... 4:6 code 7:9 come 6:17 8:10 8:11 coming 7:23 comment 5:15 5:17,23 6:7 7:3 7:12 comments 1:13 2:7 3:10 5:4,10 8:13 commercial 8:6 community 1:15 2:3 3:11 6:5 concerned 7:5 congestion 6:1 conjunction 1:14 3:11 Considering 6:21 construction 5:24 contribute 5:22 corner 6:10 corridor 7:7 cost 8:7 county 1:9 3:6 6:14 Court 3:16 4:7 5:6 9:5 cow 8:4 cows 8:8 CRR 5:5 9:18	drive 7:18	INFORMATI... 2:3 infrastructure 8:6 installed 7:6 Involvement 4:4	movingwaters... 7:9
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Phone: 1.800.280.3376

Fax: 314.644.1334

GREENE CO. HIGHWAY DEPT. PUBLIC HEARING 3/23/2017

3:10 4:4 5:4,10 5:15 6:7 7:3,12 8:13 put 8:6	Specialist/Tra... 4:4 Springfield 3:14 4:9 6:3,10 started 5:24 state 3:17 5:7 9:5 stenotype 9:9,11 STIPULATED 5:3 stole 6:14 street 6:9,25 8:3 study 5:18	Wanda 3:13 want 5:17 wanted 5:22 7:1 Ward 4:5 way 8:8 we've 6:12,21 Weaver 6:10 went 8:2 West 3:14 6:9 Wichita 8:1 wife 5:19,23 work 6:3 written 5:9	40 7:17 417.877.9700 4:10 4615 7:8 49-N 6:13	
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S 4:1 5:2 Saunders 2:8 5:16 save 8:11 saying 8:11 School 3:13 security 7:6 see 5:24 6:4 8:2 SERVICES 4:8 set 9:7 settlement 6:15 sheet 9:8 shorthand 5:5 simple 7:24 skill 9:12 soon 5:24 sound 6:19,24 South 6:13 7:8 southwest 6:2	U V Vest 3:15 4:8 5:5 9:3,18 W waiting 7:22			

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#1



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, April 20, 2017 9:22:09 PM

Last Modified: Thursday, April 20, 2017 9:42:24 PM

Time Spent: 00:20:15

IP Address: 99.45.214.103

PAGE 1

Q1: Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

First we understand the need to expand Kansas Expressway and are not arguing against the extension. We knew when we purchased a home in Stone Meadow that this was going to happen at some point. However, we are writing to express our concerns with regards to the development of the initial phase and implications this may have on the intersection of Weaver and Kansas.

In following the planning and talking with staff, there is a possibility that the next phase of Kansas Express Way could terminate into Weaver Road with no defined time frame to complete the project further south toward Nixa.

We would never have imagined this scenario and it is with much disappointment to learn that this would possibly be an option. Weaver Road, as is in Farm Road 178, is just that a Farm Road. Weaver Road is a narrow, very hilly country road with blind spots that can barely accommodate two passing vehicles or the volume during busier times of the day. This area is one hundred percent residential as compared to Republic Road which is entirely retail-commercial and has been improved. Weaver is not designed for nor can it in any way sustain the traffic that at present now turns on to Republic Road.

Given that James River and Campbell continue to be a bottle neck to the south, expanding Kansas just to Weaver will provide a route for many around that intersection placing them on a road that is not designed for more traffic. It would seem a better fit to take at least to Plainview which has been upgraded in recent years.

We urge the planning team to not have Kansas Expressway terminate for any period of time into Weaver. We also urge members of the team to come out in the rush hour times (morning or evening after work) and watch cars come over the hills and attempt to pull on to Weaver from an adjacent street or Driveway between the current Kansas and Campbell.

Should you have any questions, please feel free to contact us.

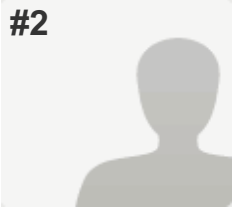
Q2: Name:

David & Karen Taylor

Q3: Email:

dkaylorfam06@att.net

#2



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Friday, April 21, 2017 9:47:36 AM

Last Modified: Friday, April 21, 2017 9:49:49 AM

Time Spent: 00:02:13

IP Address: 68.186.173.247

PAGE 1

Q1: Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

I went to the open house you had at the school and found it very informative. The entire project was presented well. I am excited to see it become reality.
My vote is move forward as soon as possible.

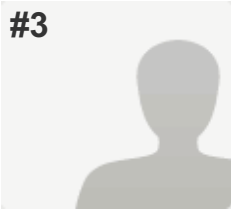
Q2: Name:

Respondent skipped this question

Q3: Email:

Respondent skipped this question

#3



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Friday, April 21, 2017 2:12:44 PM

Last Modified: Friday, April 21, 2017 2:21:17 PM

Time Spent: 00:08:33

IP Address: 38.88.52.154

PAGE 1

Q1: Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

April 21, 2017

Adam Humphrey, Assistant Administrator
Greene County Highway Department
2065 N. Clifton Ave.
Springfield, MO 65803
AHumphrey@greenecountymo.gov

Re: Comments on Kansas Expressway Extension Project Draft Environmental Assessment; March 7, 2017; Federal Aid No. STP-5909 (802)

Dear Mr. Humphrey,

This letter and the comments herein are submitted on behalf of Brent Brown, Doug Pitt, and Michael Sutton (the "Homeowners") regarding the draft Kansas Expressway Extension Project Environmental Assessment (the "EA") released March 7, 2017. Each of the Homeowners owns property and resides within the EA's Study Area.

As proposed, the alignment of the Kansas Expressway Extension project (the "Project") would pass through the Homeowners' community, directly impacting the Homeowners, their properties, and their community. The Homeowners and a number of their representatives have participated in the public process associated with the Project over the past several years and have provided input at each limited opportunity. Numerous other homeowners who own property and/or reside within or in close proximity to the EA's Study Area have also expressed their support for the comments submitted herein.

The Homeowners appreciate the opportunity to review the EA and provide the comments detailed herein. While the Homeowners have endeavored to review the EA thoroughly and to provide comprehensive comments, it is possible that the Homeowners will have additional comments on the EA and the EA process, and the Homeowners reserve the right to provide further comments at a later date, if warranted.

For the purposes of convenience and clarity, the Homeowners' comments are separated below into General Comments and Specific Comments specific to each section of the EA as identified. All capitalized terms used in this comment letter are intended to have the meaning attributed to them in the EA unless otherwise defined.

Thank you in advance for your time and careful consideration of the Homeowners' comments and concerns regarding the EA and the Project.

I. GENERAL COMMENTS

1. As described in greater detail below, in its current form the EA is incomplete, inadequate, and insufficient to meet the requirements of NEPA. Greene County, the Federal Highway Administration, and the Missouri Department of Transportation (the "Cooperating Agencies") failed to adequately investigate, study, and analyze the potential impacts to a number of identified and significant resources associated with the Project. As a result, the Cooperating Agencies have failed to prepare an environmental assessment that adequately addresses the direct, indirect, and cumulative adverse impacts of the Project or adequately considers mitigation of the adverse impacts of the Project. Further, the Cooperating

Kansas Extension Environmental Assessment Comment Card

Agencies' and the EA's inadequate investigation, study, and analysis preclude the full and proper consideration and characterization of potential Project impacts. The Cooperating Agencies need to conduct further investigations, study, and analyses of the potential Project impacts to a number of identified and significant resources.

2. As described in greater detail below, the EA is inadequate and incomplete because it improperly proposes to delay a number of analyses regarding reasonably foreseeable direct and indirect impacts of the Project until a later date, such as Project design or construction phases. Rather than conducting these analyses and presenting the findings in the EA, the Cooperating Agencies offer assurances of future additional assessment and study. However, such assurances cannot obviate the need for compliance with NEPA regulations. The Cooperating Agencies need to conduct investigations, study, and analysis of all reasonably foreseeable direct and indirect impacts of the Project and present the findings to the public.

3. As described in greater detail below, the Homeowners are concerned that without further study of the potential Project impacts, and if the Project proceeds as currently proposed, the Project will violate the Endangered Species Act.

4. As described in greater detail below, the EA does not fully, fairly, and adequately assess the proposed alternatives, including the No Action (No Build) Alternative, because the EA demonstrates a clear and unfair bias for the Preferred Alternative. The Cooperating Agencies should reevaluate each of the proposed alternatives in a fair and unbiased manner and prepare an unbiased environmental assessment.

5. As described in greater detail below, the EA does not fully, fairly, and adequately assess the proposed alternatives, including the No Action (No Build) Alternative, because the Cooperating Agencies irreversibly and irretrievably committed themselves to the Preferred Alternative and the Project's proposed alignment prior to the preparation of the EA. The Cooperating Agencies should reevaluate each of the proposed alternatives in a fair and unbiased manner and prepare an unbiased environmental assessment.

6. As described in greater detail below, the EA potentially fails to accurately characterize a number of identified impacts to the quality of the human environment as substantial and/or significant. To the extent identified impacts are significant, the Cooperating Agencies should prepare a Notice of Intent to prepare an Environmental Impact Statement (EIS) and proceed with an EIS process.

7. For all of the reasons described in greater detail herein, the Homeowners do not support the Cooperating Agencies' selection of the Preferred Alternative and, if an alternative is to be selected, urge the Cooperating Agencies to select the No Build Alternative as the preferred alternative at this time.

II. SPECIFIC COMMENTS

For convenience and clarity, the comments that follow are separated to correspond with the sections of the EA as identified by each section's heading.

1.0 Purpose and Need for Action

The EA and the Preferred Alternative (as identified in the EA) fail to meet the stated purpose and need for the proposed action because neither the EA nor the Preferred Alternative consider or include improvements or enhancements to Campbell Avenue (Hwy 160), to the east-west connections between Campbell Avenue and the Project, or beyond the southern terminus of the Project. Further, the stated purpose and need exhibit a clear bias against the No Action (No Build) Alternative.

The EA identifies the study purpose as follows:

The study purpose is to improve north/south connectivity for area residents from the growing areas in southern Greene County and northern Christian County to the employment centers, recreational areas, and retail centers in the City of Springfield. More specifically, the issues that the Study is meant to address include:

1. Improve the functionality of the Cox Road corridor by reducing the amount of commuter traffic along this primarily residential, "secondary arterial" street.

2. Improve the regional transportation network by adding an additional north-south corridor, improving system-wide travel times, reducing travel delays, and improving safety.

3. Provide needed network improvements to accommodate existing and projected growth in the southern Springfield/Greene County area

Kansas Extension Environmental Assessment Comment Card

Springfield/Greene County area.

(EA at 1-2).

The EA summarizes the purpose and need as follows:

Due to historical and continued development in southern Springfield, Greene County, and in northern Christian County, a large number of commuters are coming into Springfield from the south. The relative lack of sufficient north-south routes into the area results in increased traffic congestion and a higher crash rate compared to statewide averages. Congestion and higher crash rates are expected to continue to increase over the next 20 to 30 years.

(EA at 1-12).

The EA describes Cox Road as follows:

The Cox Road corridor is classified as a “secondary arterial” – primarily residential with direct access from numerous residential driveways. Secondary arterials, as outlined in the OTO Journey 2035 – Long Range Transportation Plan, 2011 (OTO, 2011), are intended for moderate traffic volumes traveling at moderate speeds, usually less than 35 miles per hour. . . . Cox Road was not intended to serve as a high volume and longer-distance commuter facility.

(EA at 1-6).

The EA describes Campbell Avenue as follows:

This segment is already approaching capacity and can handle only minimal additional traffic growth. As traffic grows and congestion increases, commuters are finding alternative routes to get to their destinations, which explains in part why the increase in traffic just south of the James River Expressway is less than the increases along other sections of Campbell Avenue. As shown in Table 1-6, traffic is diverting both east and west of Campbell Avenue on both Weaver Road and Plainview Road. Vehicles diverting west are using Cox Road or Kansas Avenue to then go north on the Kansas Expressway. Vehicles diverting east are heading north on National Avenue.

(EA at 1-10, 1-11).

The Preferred Alternative ostensibly meets the stated purpose and need, as outlined above, and will relieve north-south congestion along Campbell Avenue and Cox Road by providing an alternative north-south route. However, the Preferred Alternative and the EA fail to address the existing identified problems associated with current east-west travel along Weaver Road and Plainview Road, and problems associated with increased traffic on Cox Road beyond the southern terminus of the Project. These problems will only be exacerbated by the proposed Project.

For example, as indicated in Table 1-6, reproduced below, traffic is expected to increase drastically along Weaver Road and Plainview Road during the study period.

If the Project is completed as proposed and as intended it will draw a portion of the current traffic from Cox Road and an increasing amount of traffic from Campbell Avenue to the Project. However, the EA fails to address the potential impacts associated with the Project's effect of increasing traffic along Weaver Road and Plainview Road and does not propose any enhancements or modifications to either. In this regard the Preferred Alternative fails to meet stated purpose and need to “[p]rovide needed network improvements to accommodate existing and projected growth in the southern Springfield/Greene County area.”

Further, the Preferred Alternative is proposed to terminate on its southern end at Farm Road 190, including an east-west connection with Cox Road (see EA at 2-3); but the Preferred Alternative does not include any additional improvements beyond the southern terminus of the Project where the proposed roadway merely reconnects with Cox Road. Cox Road will continue to be a secondary arterial. By connecting the substantial projected traffic of the Project, as projected in the above table, back to Cox Road without any additional improvements or enhancements to Cox Road or elsewhere beyond the southern terminus, the Preferred Alternative will only exacerbate existing problems at the southern end of the route. This fails to meet stated purpose and need to “[i]mprove the functionality of the Cox Road corridor” or “[p]rovide needed network improvements to accommodate existing and projected growth in the southern Springfield/Greene County area.”

Further still, while the EA recognizes that Campbell Avenue is “already approaching capacity and can handle only

Kansas Extension Environmental Assessment Comment Card

minimal additional traffic growth,” the EA fails to propose any improvements or enhancements to Campbell Avenue. By identifying a significant problem but failing to even remotely address it, the Preferred Alternative fails to meet stated purpose and need to “[p]rovide needed network improvements to accommodate existing and projected growth in the southern Springfield/Greene County area.”

Finally, insofar as the EA identifies the purpose and need generally as to “[i]mprove the regional transportation network by adding an additional north-south corridor” in order to correct “[t]he relative lack of sufficient north-south routes,” the stated purpose and need of the Project patently disregards any alternative associated with making improvements to the existing corridors or routes and exhibits a clear bias against the No Action (No Build) Alternative. In other words, it is as if the stated purpose and need for the Project were nothing more than “build the Preferred Alternative.”

In order to fully and fairly provide the required environmental assessment, the Cooperating Agencies should develop and consider an unbiased purpose and need that allows consideration of all potential alternatives and incorporates a comprehensive perspective to solving the existing traffic problems along all roadways in the region.

2.0 Alternatives Considered

The EA does not fully, fairly, or adequately consider all alternatives because the EA and the Cooperating Agencies exhibit a clear bias for the Preferred Alternative and against the No Action (No Build) Alternative. Further, it appears as though the Cooperating Agencies may have violated NEPA by predetermining the outcome of the environmental analysis prior to conducting the EA.

The Preferred Alternative is described as follows:

The preferred alternative (Alternative 15-1) would extend from the northern terminus at the intersection of Kansas Expressway and Republic Road south to the southern terminus at Farm Road 190, including an east-west connection between Cox Road and the Kansas Expressway at the southern Study limit. This alternative would solve the transportation problems identified in the Purpose and Need section of this document by shifting more traffic from the Cox Road corridor, provide a newer, safer relief route for existing and future traffic; provide a better transportation network to accommodate existing and projected growth; as well as provide improve linkages to the area trail networks. Initially, the preferred alternative would be constructed as a two lane facility and eventually a four lane facility once traffic conditions warrant.

(EA at 2-9).

The EA provides that the Preferred Alternative was selected for the following reasons:

Based on the results of previous planning efforts and the screening process described in Appendix A, the current Build Alternative (Alternative 15-1), is recommended as the preferred alternative (Figure 2-1). This alternative best addresses the Purpose and Need for the Project, limits disruption to the natural and social environment, and was developed in consideration of input received from the public and environmental resource agencies.

[. . .]

The preferred alternative would extend from the northern terminus at the intersection of Kansas Expressway and Republic Road to the southern terminus at Farm Road 190, including an east-west connection between Cox Road and the Kansas Expressway at the southern Study limit. Initially, the preferred alternative would be constructed as a two lane facility and eventually expanded to a four lane facility once traffic conditions warrant.

The [Preferred Alternative] would result in a substantial diversion of traffic from both Cox Road and from Campbell Avenue. As illustrated in Figure 2-2, 11,000 to 17,000 vehicles per day are expected to divert from existing facilities to the Study Corridor by the year 2040. The trips generated along the Study Corridor would primarily consist of:

1. Current trips diverting from Cox Road – 5,000 to 6,000 trips per day
2. Current trips diverting from Campbell Avenue – 3,000 to 4,000 trips per day
3. Current trips diverting from National Avenue – 1,000 to 2,000 trips per day
4. New trips diverting from other locations – 2,000 to 5,000 trips per day

(EA at 2-2, 2-4).

As described in the comments on Section 1.0, above, the EA and the Cooperating Agencies exhibit a clear bias for the Preferred Alternative and against the No Build Alternative from the outset, as demonstrated in the crafting of the

Kansas Extension Environmental Assessment Comment Card

identified Purpose and Need for the EA. Indeed, partway through the EA and after defining the “Preferred Alternative,” the EA document begins to use the term “Build Alternative” in the place of “Preferred Alternative.” The usage of “Build Alternative,” when a number of different alternatives included certain build components, in the place of “Preferred Alternative” further demonstrates the Cooperating Agencies’ underlying bias for the Preferred Alternative as the only acceptable alternative among the myriad build alternatives available for consideration.

Further, it appears the Cooperating Agencies may have violated NEPA by predetermining the outcome of the environmental analysis in the EA, and Greene County may have irreversibly and irretrievably committed itself to the Preferred Alternative and the Project’s proposed alignment by actively acquiring right-of-way through the Study Area over the past several decades.

For example, as expressly admitted in the EA, “[t]hrough negotiations with property owners and developers working through the Greene County Subdivision process, more than 90 percent of the mapped corridor from Republic Road south to Steinert Road (Farm Road 186) was acquired by Greene County between 1995 and 2005.” (EA at 1-1, 1-2).

Further examples of Greene County’s premature commitment to the Preferred Alternative can be found in Table 5-2 of the EA, Summary of Comments and Questions from Questionnaire, which provides the following comments and agency responses:

Comment: Can the curve near the Royal Oaks subdivision be moved farther east?

Response: The roadway has been laid out to best fit within the limits of the property owned by Greene County. The alignment of the new roadway may be slightly adjusted during the final design process.

Comment: Why does the road follow the homes in the Lennox Place subdivision when the county owns the land adjacent to the corridor? Can this part of the road be straightened to increase distance from homes?

Response: The new roadway lies within the property dedicated to Greene County. The alignment of the roadway near Lennox Place may be slightly adjusted during the final design process.

(EA at 5-6, 5-7).

As clearly admitted in the EA, Greene County previously and prematurely (beginning more than 20 years ago) took affirmative actions to acquire large portions of the right-of-way necessary for implementation of the Preferred Alternative, and Greene County has allowed its prior actions and ownership interests to influence the formation and selection of the Preferred Alternative. As a result, because Greene County already owns large portions of the Preferred Alternative’s proposed right-of-way, the Cooperating Agencies have irreversibly and irretrievably committed themselves to a plan of action that is dependent upon the NEPA environmental analysis producing a certain outcome—adoption of the Preferred Alternative—before the required environmental analysis was commenced or is complete.

The environmental assessment process is supposed to involve an objective, good faith inquiry into the environmental consequences of the proposed action, and full and fair consideration of all alternatives. Instead, as expressly demonstrated in the EA, the Cooperating Agencies did not adequately assess all alternatives and demonstrated a clear predetermined bias for the Preferred Alternative.

Due to the clear and self-proclaimed bias of Greene County, the entire EA and especially its preference for the Preferred Alternative and assessment of its potential environmental impacts is tainted. A full and fair analysis of all alternatives and their environmental impacts must be conducted by the Cooperating Agencies in order to comply with the requirements of NEPA.

3.0 Impacts of the Proposed Action

3.1 Land Use

The EA does not correctly characterize the Study Area or adequately recognize the intrinsic value of the Study Area as undeveloped, wooded open space. As a result, the EA does not adequately consider the direct impacts the Project and Preferred Alternative would have on Land Use in the Study Area.

The EA describes the Study Area as consisting of primarily “residential development, with some commercial/office areas, planned development, and other areas classified as plot assignment districts,” and concludes that “[t]he Build Alternative will not directly impact any identified public facility or service, including schools, religious facilities, parks, recreational facilities or transit services.” (EA at 3-2)

Kansas Extension Environmental Assessment Comment Card

recreational facilities or transit services. (EA at 3-2).

The Study Area is indeed a primarily residential area, but a vast majority of the Study Area is undeveloped, wooded open space. The Preferred Alternative would require the removal of approximately 45 acres of trees and the construction of a four lane roadway right through the middle of undeveloped open space. Undeveloped open space such as this is increasingly rare in the southern Springfield area, and while its value and positive impact on the community are difficult to quantitatively assess, its importance to the character of the community, including the schools, parks, recreational opportunities, and religious facilities in the area, cannot be overstated.

The EA should correctly identify and characterize the Study Area as containing primarily undeveloped, wooded open space and provide a description of the direct impacts the Preferred Alternative would have thereto, including impacts relative to applicable land use and community plans in the area.

3.2 Socioeconomics and Environmental Justice

The EA does not adequately analyze the Project's potential socioeconomic and environmental justice impacts because the EA mischaracterizes the Study Area and fails to recognize the intrinsic value of the Study Area to the community as undeveloped, wooded open space.

The EA concludes generally that the Project will have only positive socioeconomic impacts on the Study Area. This conclusion is based in large part on the characterization of the Study Area as follows:

Because much of the Study Area is dominated by residential land uses, areas with the opportunity for economic growth and development are located at the north and south ends of the Study Corridor. [. . .] The Study Area is currently made up of a number of distinct neighborhoods. There is not currently connectivity between these neighborhoods or between the neighborhoods and other facilities and services beyond the existing road network.

(EA at 3-18).

Similar to Section 3.1, Land Use, this portion of the EA mischaracterizes the Study Area and fails to recognize the innate value of the Study Area to the community as undeveloped, wooded open space. In turn, the EA does not adequately analyze the direct impacts associated with drastically altering the character of the Study Area as proposed by the Project.

Further, rather than being constructed in a number of distinct neighborhoods with no connectivity between them as described in the EA, as proposed the Project would in reality bisect and disconnect neighbors and neighborhoods that comprise a larger community. The community is larger than any one neighborhood, especially in regard to the schools and religious institutions in the area. The EA offers no assessment of the potential impacts caused by the Project to the human environment of the larger community.

Further still, the EA fails to assess the potential impacts to private property and home values in the Study Area. As described above, as proposed the Project would bisect the larger residential community and replace the stillness of undeveloped, wooded open space with a four lane roadway. The proposed Project would drastically and negatively alter the character of the Study Area, directly and negatively impacting private property and home values.

The EA should correctly identify and characterize the Study Area as containing primarily undeveloped, wooded open space and provide a description of the direct impacts the Preferred Alternative would have on the socioeconomics and environment of the community related thereto.

3.3 Right-of-Way Acquisition

Similar to Sections 3.1 and 3.2, as described above, this section of the EA fails to adequately recognize the value of the Study Area to the community as undeveloped, wooded open space. As a result, the EA does not adequately analyze the impacts associated with removing approximately 45 acres of trees and drastically altering the character of the Study Area as proposed by the Project.

For example, the EA ignores the significant character of the Study Area's undeveloped, wooded open space and concludes plainly that "[p]roperty from ten parcels would be needed to construct the Project, resulting in approximately 19 acres of additional ROW being acquired. These parcels are all currently vacant. It is not anticipated that any residences or businesses would need to be acquired." (EA at 3-20).

The EA should correctly identify the Study Area as containing primarily undeveloped, wooded open space and provide a

Kansas Extension Environmental Assessment Comment Card

description of the direct impacts the acquisition of right-of-way and construction of the proposed roadway under the Preferred Alternative would have related thereto.

3.4 Air Quality

The EA identifies the potential for increased air pollution in “a few localized areas,” but fails to recognize that the majority of the Study Area is undeveloped, wooded open space, and as proposed the Project will require the removal of approximately 45 acres of trees within a tranquil residential area to replace it with the proposed four lane roadway. As a result, the EA does not adequately identify or assess potential Project impacts to air quality in the Study Area.

Regarding air quality impacts associated with the Preferred Alternative, the EA concludes simply as follows:

[T]he NAAQS and MSAT emissions from the Build Alternative are expected to be the same or lower in the design year (2040) than those from the No Build Alternative in the Project area. It is important to note that there could be increases in NAAQS and MSAT emissions in a few localized areas; however, the area as whole is not expected to see a detrimental impact to the air quality between the Build and No Build Alternatives.

(EA at 3-22).

Rather than focusing solely on vehicle emissions in the Study Area to justify selection of the Preferred Alternative, the EA should also identify and assess the air quality impacts directly associated with removing 45 acres of trees and replacing them with a four lane roadway. Further, the EA should assess the direct impact the Project will have on the air quality of the human environment; that is, removing 45 acres of trees and replacing them with a four lane roadway in the middle of a residential community.

3.5 Climate Change

The EA does not provide an adequate assessment of potential impacts related to Climate Change because the EA considers only vehicle emissions.

The Council of Environmental Quality’s guidance on analyzing the impacts of GHG emissions for NEPA evaluations provides as follows:

The analysis of climate change impacts should focus on those aspects of the human environment that are impacted by both the proposed action and climate change. Climate change can make a resource, ecosystem, human community, or structure more susceptible to many types of impacts and lessen its resilience to other environmental impacts apart from climate change. This increase in vulnerability can exacerbate the effects of the proposed action. For example, a proposed action may require water from a stream that has diminishing quantities of available water because of decreased snow pack in the mountains, or add heat to a water body that is already warming due to increasing atmospheric temperatures. Such considerations are squarely within the scope of NEPA and can inform decisions on whether to proceed with, and how to design, the proposed action to eliminate or mitigate impacts exacerbated by climate change. They can also inform possible adaptation measures to address the impacts of climate change, ultimately enabling the selection of smarter, more resilient actions.

(Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews, August 1, 2016, Section III.B.2., page 21).

Section 3.5 of the EA analyzes only vehicle emissions associated with the alternatives considered; it fails to address any aspects of the human environment that may be impacted by the proposed action. For example, the EA fails to address climate change related impacts to the streams, vegetation, or wildlife in the Study Area, and the direct impact the Project may have on them and their resilience. Further, the EA fails to address the climate change related impacts to the human environment, in this case a residential community, associated with removing 45 acres of undeveloped, wooded open space to construct a four lane paved roadway.

The EA should provide a complete assessment of the potential impacts associated with climate change in the Study Area in conformance with the Council of Environmental Quality’s guidance.

3.6 Noise

The EA does not adequately assess or provide mitigating options for Project noise impacts to the Study Area.

Kansas Extension Environmental Assessment Comment Card

The EA identifies four residential areas that would be impacted by the Project; however, noise barriers are proposed for only two of these areas. (See EA Figure 3-11; EA at 3-28). Ostensibly the Cooperating Agencies propose no mitigation for the other two areas whatsoever. The impacted areas identified in the EA are homes. The proposed alignment of the Project will abut a number of residential communities and homes. As described above, most of the Study Area is tranquil, undeveloped, wooded open space. Construction of the proposed Project would remove approximately 45 acres of woods and replace them with a four-lane paved road, directly and substantially increasing noise and impacting numerous homes and homeowners.

The EA identifies potentially significant impacts of noise on the human environment, but it falls short of identifying methods to mitigate those impacts. This analysis is inadequate and incomplete. Further, if the impacts cannot be mitigated, they may be significant impacts which necessitate the preparation of an EIS.

3.7 Water Resources

The EA's assessment of potential impacts to water resources is inadequate and incomplete because it fails to assess the long term impacts associated with construction activities over the full duration of the proposed Project or the lasting impacts of the proposed Project's impermeable roadway.

The EA identifies the following concerns regarding water resources:

Construction near streams and rivers makes it possible for soil to wash into an adjacent the [sic] water body. Over time, increased amounts of sediment can damage the river ecosystem by lowering oxygen levels and covering food sources and fish spawning areas. Soil and rock that is washed away can change the river bottom, affecting those species that use the bottom for food or habitat. Without onsite pollution controls, sediment-laden runoff from construction sites could degrade water quality. In addition, stormwater could pick up other pollutants such as concrete washout, paint, used oil, pesticides, or other debris, potentially harming or killing fish and wildlife, degrading aquatic habitat, and affecting drinking water quality.

(EA at 3-31).

Regarding potential impacts to water resources, the EA concludes generally as follows:

Construction-related impacts to water quality would be primarily the result of stormwater runoff. Water quality impacts resulting from construction of the new roadway would be relatively short-term due to the nature of the construction process. [. . .] The Build Alternative would increase stormwater runoff after construction as the area of impermeable pavement would increase. Also, there would be application of compounds used to de-ice roadway surfaces in the Study Corridor once the Project is completed. Use of these chemicals takes place primarily during wet seasons when precipitation dilutes their concentration.

This analysis and these conclusions of the EA are inadequate, first, because they fail to recognize as described elsewhere in the EA that the proposed Project contemplates the initial construction of two travel lanes that would ultimately be built out into a full four lane facility in 15 to 20 years (EA at 2-9). As proposed, the Project is not a short-term, discrete construction project; it is a phased and escalating construction project taking place over 20 years. Thus, the potential impacts to water resources of the proposed construction activities should be assessed over the entire span of the proposed Project construction timeline. The potential impacts in this regard merit further analysis and explanation, and could be substantial or significant.

Second, while the EA identifies that the proposed Project will increase stormwater runoff after construction is complete because it will result in an increased area of impermeable pavement, the EA does not provide any discussion or assessment of the potential impacts related thereto. The EA should provide discussion and analysis regarding the long term impacts to water resources, including the increased burden on existing stormwater facilities, associated with constructing the proposed Project's large impermeable surface.

Finally, as discussed in greater detail in the comments on Section 3.9, below, because the EA does not fully investigate or analyze geologic structures in the Study Area and their possible interconnectedness, without further investigation and study neither the Cooperating Agencies nor the public can adequately understand the potential impacts of the Project on water and other interconnected and related resources.

3.8 Aquatic Resources

The EA's assessment of potential impacts to aquatic resources is inadequate and incomplete.

Kansas Extension Environmental Assessment Comment Card

The EA concludes that “[u]nder the Build Alternative, construction of the roadway would result in temporary impacts to two ephemeral streams and two perennial streams that cross the Study Corridor.” (EA at 3-39). This conclusion is inadequate because it fails to recognize as described elsewhere in the EA that the proposed Project contemplates a long term, phased project that would take place over 15 to 20 years (EA at 2-9). The potential impacts to aquatic resources should be assessed over the entire span of the proposed Project construction timeline.

The EA’s assessment of potential impacts to aquatic resources assessment is by its own admission incomplete. For example, in discussing potential impacts to wetlands and rivers, the EA states “[o]nce the construction plans are finalized, the anticipated impacts of the Build Alternative would be finalized.” (EA at 3-39). Further, in describing possible mitigation for potential impacts, the EA states, “[f]ollowing completion of additional studies, the potential impacts to streams and wetlands would determine any need and further course of action for mitigation.” The EA expressly identifies the need for additional study to assess potential impacts to aquatic resources; these studies and assessments should be completed and published so the Cooperating Agencies and the public can adequately understand the potential impacts of the Project on aquatic resources.

3.9 Biological Resources and Threatened and Endangered Species

The EA’s assessment of potential impacts to biological resources and threatened and endangered species is inadequate, incomplete, and insufficient to meet the requirements of NEPA. If the Project were to proceed on the basis of the EA, the Homeowners are concerned the Project may violate NEPA and the Endangered Species Act (ESA).

For example, the EA identifies eight federally-listed species that may occur within or near the Study Corridor (EA at 3-42). Among the identified species are the Indiana bat, the northern long-eared bat, the gray bat, and the Ozark cavefish. The EA further states that a Preliminary Geologic Evaluation of the Project Corridor was performed and a total of 23 karst features were visually identified within or in the vicinity of the Project, including 16 depressions (shallow and deep), 3 open voids, 1 collapse, 1 surface opening, 1 spring, and 1 cave. (EA at 3-45). Further, the EA states that information provided by MoDOT in December 2016 indicated four to six known caves within 0.5 miles of the Study Corridor. (EA at 3-45). The EA expressly recognizes that “[s]ome karst features, such as caves and mines, can be used by Indiana and northern long-eared bats for hibernation and by gray bats throughout the year. Ozark cavefish are also known to inhabit caves, streams, and springs in Greene County.”

To assess potential impacts to these endangered species and their identified habitat, the EA relies primarily on an acoustic survey conducted in August 2015 within a portion of the corridor along Workman Branch near South Kansas Avenue (Armstrong and Robbins, 2015), which detected the presence of the gray and northern long-eared bat, and additional bat habitat assessments conducted by Greene County in 2015 which identified suitable summer roosting and foraging habitat for both the Indiana bat and the northern long-eared bat within the Study Area. (EA at 3-44). However, both of these studies are limited in approach, season, scope, and extent, and by themselves do not adequately assess all potential impacts to the identified endangered species in the Study Area.

In particular, neither of these studies directly evaluated the numerous features identified in the Study Area nor investigated the broad Study Area for additional features and habitat. As a result, the Cooperating Agencies have not conducted, and the EA does not contain, adequate comprehensive, detailed, on-the-ground investigations or assessments of the identified features, potential habitat, or the potential impacts to endangered species. Instead, the EA merely proposes that “[the geotechnical survey done in January 2016] and future geotechnical and other investigations within the Study Corridor necessary for final design and construction will be used to identify karst features. Known caves in proximity to the Study Corridor (0.5 mile) that could be indirectly disturbed or affected by construction activity, as well as potentially suitable karst features identified within the Study Corridor, will be investigated for the presence of protected bats.” (EA at 3-44).

Further, regarding one known cave feature, the EA provides that “[t]he one cave feature identified in the PPI geologic investigation (Appendix G; KE21) coincides with a known cave in the MSS database (MSS, 2016). The entrance to this cave is outside and adjacent to the Study Corridor near the proposed crossing of Ward Branch. MSS conducted an investigation of this cave in February 2016. It has a mapped passage that extends approximately 140 feet and crosses under the proposed alignment. There is a stream flowing at the far end of the passage and there were no signs of winter bat use by any common or protected bat species or cavefish at the time of the investigation.” Rather than the Cooperating Agencies conducting full, detailed, on-the-ground study or assessment and providing the results in the EA, the EA concludes, “[a] follow-up survey in the summer to determine any use by northern long-eared bats, gray bats, or Ozark cavefish is warranted.” (EA at 3-45).

Until these additional, proposed, warranted investigations and studies are completed, neither the Cooperating Agencies nor the public can adequately understand the potential impacts of the Project on biological resources and threatened

Kansas Extension Environmental Assessment Comment Card

and endangered species, and the EA is both incomplete and inadequate.

Yet another example of the EA's incompleteness and inadequacy is evident in the following passage:

This project is expected to avoid direct adverse impacts to caves which could be used by protected bat species. During future geotechnical and subsequent investigations necessary for final design and construction, any karst features identified as possible cave habitat in or near the Project will be investigated for the potential use by any protected bat species or cavefish. Known caves within 0.5 miles of the Study Corridor that could provide habitat for protected bats or Ozark cavefish that could be indirectly disturbed or affected by construction activity will also be investigated.

(EA at 3-46) (emphasis added).

The Cooperating Agencies' failure to conduct reasonable, necessary, and identified investigations and studies, and their absence from the EA evident in this Section 3.9, Biological Resources and Threatened and Endangered Species, further limits the EA's adequacy in a number of other assessments as well. For example, because the Cooperating Agencies have not investigated and the EA does not assess the identified karst features, the Cooperating Agencies and the EA are unable to fully assess potential impacts to water resources (Section 3.7) or aquatic resources (Section 3.8) that may have a direct connection to such geologic structures. For example, without knowing the location, extent, and potential interconnectedness of the karst features as well as their relationship with surface and ground water in the Study Area, neither the Cooperating Agencies nor the public can adequately assess the potential impacts associated with stormwater runoff, pollutants, or construction debris entering these features.

Finally, the Homeowners are concerned the EA likely cannot withstand scrutiny under NEPA or the ESA insofar as it proposes to delay a number of the analyses of reasonably foreseeable direct and indirect impacts of the Project, including analyses of impacts to Biological Resources and Threatened and Endangered Species, until after a later date such as Project design or construction phases. Although the Cooperating Agencies' assurances of future additional assessment and study may possess a certain pragmatic appeal to the Cooperating Agencies, such assurances cannot obviate the need for compliance with NEPA regulations. Further, until such assessments and studies are completed, neither the Cooperating Agencies nor the public can adequately assess compliance with the ESA or NEPA.

The Cooperating Agencies should perform comprehensive, on-the-ground investigations of the Study Area, including investigations of known and unknown geologic structures, in order to fully assess potential impacts to biological resources and threatened and endangered species, as well as a number of other interconnected and related resources.

3.10 Farmland

The Homeowners do not have any comments on the EA's findings regarding farmland at this time. The Homeowners reserve the ability to and may comment on the EA in relation to potential impacts of the Project on farmland at a later date.

3.11 Geology and Soils

The EA's assessment of potential impacts to geology and soils is inadequate, incomplete, and insufficient to meet the requirements of NEPA.

The EA concludes that "[t]he Build Alternative could result in potential impacts and hazards associated with geology and soils." (EA at 3-56). Among the identified potential impacts and hazards are the disturbance of soils and bedrock; soil erosion; and that sediment, surface water/construction fluids, and road runoff could be introduced to the Springfield Plateau aquifer. (EA at 3-56).

Further, the EA identifies a number of potential impacts and hazards associated with sinkholes and other karst features as follows:

[S]inkholes and other karst features (e.g., vanishing streams) may act as a direct conduit for surface water to enter groundwater. [. . .]

Modifications of the hydrology of the Springfield Plateau aquifer could result in potential impacts. Karst aquifers, particularly when cavernous, are sensitive to changes in overland flow that may cut off recharge to the aquifer through a losing stream or sinkhole. This has potential to alter spring, river, or cave ecology by modifying the existing habitats.

Due to the numerous identified karst features within the Study Area, other unidentified karst features may be

Kansas Extension Environmental Assessment Comment Card

encountered during construction of the Project. Portions of the road and ROW that are placed on top of karst features could result in structural instability.

Sinkholes and subsurface soil domes have potential to pose geologic hazards to any structure placed on or immediately adjacent to these features.

(EA at 3-56).

However, in response to these recognized potential impacts and hazards, the EA merely proposes further investigation and study at a later date:

As a result, these features must be properly identified and accounted for during the design phase and managed throughout construction and grading activities.

The presence of sinkholes and soil voids should be determined during geotechnical investigation and taken into account during the design and grading phase.

To mitigate potential impacts and hazards, karst features should be further identified and investigated. Karst features should be taken into account during the Project design phase, and a karst mitigation plan should be developed prior to construction activities.

(EA at 3-56).

It is inappropriate and inadequate pursuant to the requirements of NEPA for the EA to identify potential impacts and hazards but fail to investigate or analyze them. The Cooperating Agencies should perform the additional investigations and analyses of the geologic structures and soils in the Study Area in order to allow the Cooperating Agencies and the public to adequately assess the Project's potential impacts not only to geology and soils, but also to a number of other interconnected and related resources.

3.12 Hazardous Waste

The Homeowners do not have any comments on the EA's finding regarding hazardous waste at this time. The Homeowners reserve the ability to and may comment on the EA in relation to potential hazardous waste impacts of the Project at a later date.

3.13 Architectural, Archaeological, Cultural, and Historic Resources

The EA's assessment of Architectural, Archaeological, Cultural, and Historic Resources is incomplete and inadequate because, as stated in the EA, "due to property access issues, the archaeological survey and any related site evaluation or mitigation will be completed at a later date but prior to project construction." (EA at 3-57).

The EA further acknowledges:

The Build Alternative has the potential to impact as yet unidentified historic properties. Compliance with Section 106 is being conducted under the PA for the phased Identification and Evaluation of Historic Properties (July 2014) among FHWA, MHTC, ACHP, and MoSHPO. Additionally, impacts to archaeological resources will be considered as property access and Project design are finalized. Construction authorization for the Project cannot be issued until all of the applicable stipulations of the PA for Phased Section 106 evaluations have been satisfied.

(EA at 3-67).

It is inappropriate and inadequate pursuant to the requirements of NEPA to complete an EA, select a Preferred Alternative, and/or proceed with the Project without more fully ascertaining the potential impacts of the Project. Until the Cooperating Agencies actually complete a full assessment, neither the Cooperating Agencies nor the public can adequately understand the potential impacts of the Project. An assessment of the Project's potential impacts to the Architectural, Archaeological, Cultural, and Historic Resources should be pursued to completion.

3.15 Visual Resources

The EA mischaracterizes the Study Area and the scope of the Project and as a result does not adequately assess the potential impacts to visual resources in the Study Area. For example, the EA opines that "[t]he visual landscape is typical of a high density suburban area" (EA at 3-68). This characterization of the Study Area, and in particular that

Kansas Extension Environmental Assessment Comment Card

typical of a high density suburban area. (EA at 3-68). This characterization of the Study Area, and in particular that portion of the Study Area where the proposed Project would be constructed, mischaracterizes the existing undeveloped, wooded open space.

The EA recognizes that “[o]pen landscape, dominated by open fields and wooded areas, would be replaced by paved travel lanes and associated signage and traffic signals.” (EA at 3-69). But the EA downplays the significance of the impacts to the area, stating, “[h]owever, the Study Corridor is wider than required for the travel lanes, and initially only two lanes would be constructed. Wooded areas outside the developed ROW could remain to provide a visual barrier between adjacent residences and the Project.” (EA at 3-69).

The EA disregards the potential impacts of the Project on the visual resources of the Study Area by mischaracterizing the Study Area and the magnitude of the Project. If completed as proposed, the Preferred Alternative will destroy approximately 45 acres of undeveloped, wooded open space and replace it with a paved four lane roadway. The roadway, its associated signage, traffic signals, lighting, and the countless vehicles utilizing it would drastically alter the visual resources of the Study Area adversely impacting the human environment and dramatically altering the character of the community. The EA should fully and correctly identify these potential direct impacts.

3.16 Construction Impacts

The EA’s assessment of construction impacts is inadequate and incomplete because it fails to assess construction impacts over the full duration of the proposed Project.

This section of the EA provides discussion regarding potential impacts of Project construction activities related to Traffic Control/Detours, Air Quality, Noise, Protected Habitat, Water Quality, Impacts to Floodplains/Floodways, Visual Effects, Utilities, and Borrow and Waste Sites. In sum, the EA concludes that the Project and the Preferred Alternative “would result in short-term and temporary impacts due to construction activities . . . [including] increases in noise, dust, and pollutants discharged by construction equipment . . . [and] temporary disruptions to businesses, residences, and existing traffic patterns with the development of possible travel detours and access modifications.” (EA at 3-69).

As proposed, the Project contemplates the initial construction of two travel lanes that would ultimately be built out into a full four lane facility in 15 to 20 years (EA at 2-9). As proposed, the Project is not a discrete construction project; it is a multi-decade, phased, and escalating construction project that would impact each portion of the proposed alignment repeatedly year over year from the time the first trees are to be removed, during construction of the first two lanes, and for 20 years later when additional lanes are to be constructed and the Project is fully completed. In other words, the Project contemplates two decades of continual construction activities.

On the whole, the impacts of the proposed construction activities are neither temporary nor inconsequential. Further, because the proposed construction activities will take place over a period of 20 years or more, even minimal impacts—such as impacts to air quality, water quality, and protected habitat—should be assessed over the span of the proposed Project construction timeline. The potential impacts in this regard merit further analysis and explanation.

3.17 Indirect and Cumulative Impacts

The EA’s indirect and cumulative impacts analyses are inadequate for a number of reasons.

The EA suggests that the Project would be consistent with comprehensive traffic plans for the area and would generally result in positive economic impacts. This conclusion is ostensibly built on the following premises: (1) “additional phases of residential development would attract additional businesses to the area;” (2) “economic development follows substantial transportation and access improvements;” and (3) “[t]he Project would introduce a new roadway into the region and provide access to areas that are currently inaccessible.” (EA at 3-74).

The EA proffers no support for these premises. In addition, the notion that the Project will provide access to areas that are currently inaccessible is patently inaccurate. As stated clearly elsewhere in the EA, “[a]ccess [to the new roadway] would be limited to the existing cross-streets, each with an at-grade signalized intersection.” (EA at 2-9). Further, contrary to the idea of increasing access to inaccessible areas, the actual intended effect of the proposed Project is to move as many vehicles as quickly as possible through what is currently undeveloped, wooded open space. The indirect impacts of the Project will be to greatly alter the current character of the Study Area.

Regarding cumulative impacts, the EA recognizes that “[t]he construction of the new roadway would contribute to the cumulative loss of riparian and woodland habitat.” But the EA concludes, “[o]verall, no substantial cumulative effects are anticipated as a result of implementation of the Project, other than the positive cumulative effects on regional traffic circulation and safety.” This analysis is inadequate and insufficient in both breadth and depth. As discussed above, the

Kansas Extension Environmental Assessment Comment Card

EA fails to recognize the cumulative impact of the incremental impacts over the course of the proposed lengthy phased construction period.

Further, both the indirect and cumulative impacts analyses are inadequate because they fail to assess Project impacts associated with east-west travel along Weaver Road and Plainview Road, and problems associated with increased traffic on Cox Road beyond the southern terminus of the Project. As described above and in the EA, the effect of the proposed Project will be to draw substantial traffic from Cox Road, Campbell Avenue, and elsewhere to the new roadway. (EA at 2-4). However, the Project does not contemplate any improvements or enhancements to either Weaver Road and Plainview Road, the major identified east-west connections between the Project and Campbell Avenue. In addition, the Project terminates on its southern end by reconnecting with Cox Road; but the Project does not contemplate any improvements or enhancements to Cox Road at or beyond this southern terminus. As a result, the Project would undoubtedly burden the east-west connectors of Weaver or Plainview Roads, and Cox Road beyond the southern terminus, exacerbating problems on roadways identified in the EA as already at or beyond capacity. By failing to either assess or contemplate mitigating actions to alleviate these adverse impacts, the EA fails to provide adequate indirect and cumulative impacts analyses.

Further, the defined Study Area, depicted in Figure 1-2, does not include the entirety of Weaver Road or Plainview Road between the Project and Campbell Avenue, and does not include a meaningful portion of connecting roads beyond the southern terminus of the Project. As result, the EA fails to adequately assess the potential direct, indirect, and cumulative impacts to these surrounding roadways. To adequately analyze the indirect and cumulative impacts of the proposed Project, the Study Area should be expanded beyond Campbell Avenue on the east and further south beyond the Project's southern terminus.

4.1 Commitments

A number of the proposed commitments described in Section 4.1 of the EA serve to highlight the incompleteness and inadequacy of the EA as further detailed above.

For example, the EA proposes to commit Greene County to the construction of two noise barriers to mitigate noise impacts, but the EA ignores entirely the potential impacts to two other residential areas. (EA at 4-1).

Further, the EA recognizes in a number of commitments related to water resources, sinkholes, and karst features, that substantial amounts of information are lacking and significant additional study is necessary, as follows:

Sediment, surface water/construction fluids, and road runoff could be introduced to the Springfield Plateau aquifer. Sinkholes and other karst features (e.g., vanishing streams) may act as a direct conduit for surface water to enter groundwater. As a result, these features will be properly identified and accounted for by Greene County and its engineer during the design phase and managed by the contractor throughout construction and grading activities.

The presence of sinkholes and soil voids will be determined by Greene County and its engineer during geotechnical investigation and taken into account during the design and grading phase.

Greene County will require its contractor to use BMPs during construction in areas where karst features have been identified that will include:

- o Conducting a geologic subsurface evaluation of the Study Corridor using exploratory borings, electrical resistivity, seismic, or ground penetrating radar
- o Contacting geotechnical specialists if new karst features are found during construction

During future geotechnical and other investigations necessary for final design and construction, any karst features identified will be investigated by Greene County and a qualified biologist for the presence or potential use by protected bat species. Known caves in proximity to the Study Corridor (0.5 mile) that could be indirectly disturbed or affected by construction activity, as well as potentially suitable karst features identified within the Study Corridor, will be investigated by Greene County and a qualified biologist for the presence of protected bats. This investigation and corresponding consultation with USFWS (based on the results of the investigation) will be completed and any mitigation measures resulting from that consultation will be incorporated into the project prior to receiving a federal construction authorization for the project.

(EA at 4-2, 4-3).

Much of the information that the EA admittedly lacks, and which the EA proposes be gathered at a later date, could have been easily and readily obtained by the Cooperating Agencies prior to the completion of this EA. But the

Kansas Extension Environmental Assessment Comment Card

information was not gathered and the proposed studies were not completed. As a result, the EA's analysis of the potential environmental impacts is inadequate and the mitigating commitments are ill-informed.

The Cooperating Agencies need to conduct and complete further investigations, study, and analyses of all reasonably foreseeable direct and indirect impacts of the Project and present their findings before an adequate comprehensive list of commitments can be properly prepared.

III. Conclusion

For the reasons further explained herein, the Homeowners are concerned that the EA is unfairly biased toward the Preferred Alternative, incomplete in its analysis of potential (and potentially significant) impacts, and insufficient to meet the requirements of NEPA and the ESA.

The Homeowners appreciate the opportunity to review the EA and provide the comments detailed herein. The Homeowners do not have any further comments at this time, but reserve the right to provide additional comments, as appropriate.

Thank you for your time and careful consideration of our comments and concerns regarding the EA and the Project.

Sincerely,

Jason C. Smith
Thomas N. George
Spencer Fane LLP
Attorneys for Homeowners

cc: Brent Brown
Doug Pitt
Michael Sutton

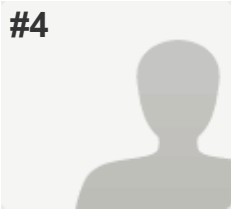
Q2: Name:

Tom George

Q3: Email:

tgeorge@spencerfane.com

#4



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Saturday, April 22, 2017 7:40:12 AM

Last Modified: Saturday, April 22, 2017 7:48:45 AM

Time Spent: 00:08:33

IP Address: 108.202.168.49

PAGE 1

Q1: Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

Topics on the extension which warrant further consideration:

- No increase in tax revenue - the project goes through only residential neighborhoods
- Reduced green space for residents and wildlife
- Diminution of property values of residents directly and indirectly bordering the project
- Lack of proper planning for the increased traffic flow going down Kansas Ave at the Weaver intersection specifically. Weaver is already crowded and without any work done to it the traffic problem will be relocated and not resolved.

Thank you for your consideration of the above points. Take care.

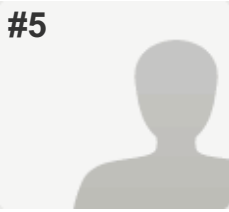
Q2: Name:

Michael Sutton

Q3: Email:

sutton_63@hotmail.com

#5



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Saturday, April 22, 2017 10:30:55 AM

Last Modified: Saturday, April 22, 2017 10:43:44 AM

Time Spent: 00:12:49

IP Address: 173.25.171.3

PAGE 1

Q1: Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

Please be advised that I fully agree and support the comments submitted April 21, 2017 on behalf of Brent Brown, Doug Pitt, Justin French, and Michael Sutton. As a fellow homeowner whose property backs up against the proposed extension, I ask that you review and seriously consider the comments as the majority opinion of those living in the area. Thank you.

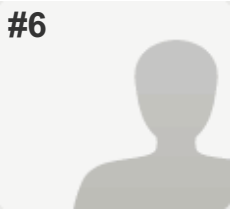
Q2: Name:

David Fessenden

Q3: Email:

fessenden76@gmail.com

#6



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Saturday, April 22, 2017 10:54:06 AM

Last Modified: Saturday, April 22, 2017 10:54:41 AM

Time Spent: 00:00:35

IP Address: 173.25.171.3

PAGE 1

Q1: Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

Please be advised that I fully agree and support the comments submitted April 21, 2017 on behalf of Brent Brown, Doug Pitt, Justin French, and Michael Sutton. As a fellow homeowner whose property backs up against the proposed extension, I ask that you review and seriously consider the comments as the majority opinion of those living in the area. Thank you.

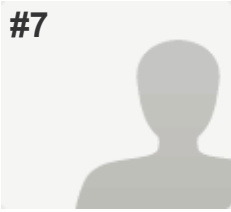
Q2: Name:

Stephanie Fessenden

Q3: Email:

Fessenden81@gmail.com

#7



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Saturday, April 22, 2017 11:45:08 AM

Last Modified: Saturday, April 22, 2017 11:46:16 AM

Time Spent: 00:01:07

IP Address: 70.195.68.195

PAGE 1

Q1: Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

I fully agree and support the comments submitted April 21, 2017 on behalf of Brent Brown, Doug Pitt, Justin French, and Michael Sutton. As a fellow homeowner whose property backs up against the proposed extension, I ask that you review and seriously consider the comments as the majority opinion of those living in the area. Thank you.

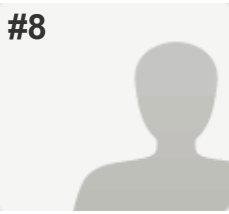
Q2: Name:

Marty Diebold

Q3: Email:

mdieb@hotmail.com

#8



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Saturday, April 22, 2017 10:30:40 PM

Last Modified: Saturday, April 22, 2017 10:39:00 PM

Time Spent: 00:08:20

IP Address: 12.31.31.149

PAGE 1

Q1: Please provide any comments you have about the Kansas Expressway Extension Environmental Assessment document:

I generally concur with the comments submitted April 21, 2017, on behalf of Brent Brown, Doug Pitt, Justin French, and Michael Sutton. I also remain concerned that Christian County has zero plans to continue the project into Christian County, despite the fact that the expansion provides benefits that directly benefit that population. To me, it appears that we are just moving the "dead end" from Republic Road to the county line. Finally, I remain concern about increased traffic on Weaver Road. That street is the sole point of ingress/egress for some Stone Meadow residents and is on the Springfield Public Schools bus route. Increased traffic might make it impossible to deliver students to school on time or require police intervention to ensure a smooth flow of traffic.

Q2: Name:

Kevin Rapp

Q3: Email:

kjrapp@gmail.com

Samuelson, Kathryn A (Kate)

From: Herleth, Michael
Sent: Wednesday, March 15, 2017 3:53 PM
To: Samuelson, Kathryn A (Kate); Thornhill, Steve
Cc: DeBacker, Michael
Subject: FW: Kansas Expressway Extension Status Update

Follow Up Flag: Follow up
Flag Status: Flagged

Kate, please add to the FONSI correspondence file.

Thanks

From: Adam Humphrey [mailto:AHumphrey@greencountymo.gov]
Sent: Wednesday, March 15, 2017 3:50 PM
To: George, Tom <tgeorge@spencerfane.com>
Subject: RE: Kansas Expressway Extension Status Update

Hello Mr. George,

Please feel free to direct any project related requests or comments to myself. I will be happy to distribute any such requests to our project team and our coordinating public agencies at both MoDOT and FHWA.

Thanks!

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

From: George, Tom [<mailto:tgeorge@spencerfane.com>]
Sent: Wednesday, March 15, 2017 3:12 PM
To: Adam Humphrey <AHumphrey@greencountymo.gov>
Subject: RE: Kansas Expressway Extension Status Update

Adam,

On behalf of the Timberbrook Property Owners Association, I will be submitting a formal request for an extension of time to submit comments on the EA. Please let me know where I should direct the formal request. The EA lists a number of contacts, but I just want to be sure the request gets to the right place as soon as possible.

Thanks,
Tom

Tom George Attorney
Spencer Fane LLP

From: Adam Humphrey [<mailto:AHumphrey@greencountymo.gov>]
Sent: Wednesday, March 8, 2017 3:34 PM
To: George, Tom
Cc: Doug Pitt
Subject: RE: Kansas Expressway Extension Status Update

Yes, that is correct. We'll continue to collect public comments up through April 7th. In the meantime, feel free to contact me with any questions that you might have regarding the EA report, and I'll do my best to get you an answer.

Thanks,

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

From: George, Tom [<mailto:tgeorge@spencerfane.com>]
Sent: Wednesday, March 08, 2017 3:40 PM
To: Adam Humphrey <AHumphrey@greencountymo.gov>
Cc: Doug Pitt <dougpitt@icloud.com>
Subject: RE: Kansas Expressway Extension Status Update

Adam,

Thank you for the email. I received the automated email notification last week as well.

Just to confirm, the comment deadline in April 7?

Thanks,
Tom

Tom George Attorney
Spencer Fane LLP

1700 Lincoln Street, Suite 2000 | Denver, CO 80203
O 303.839.3708
TGeorge@spencerfane.com | spencerfane.com

From: Adam Humphrey [<mailto:AHumphrey@greencountymo.gov>]
Sent: Tuesday, March 7, 2017 1:05 PM
To: George, Tom
Cc: Doug Pitt
Subject: RE: Kansas Expressway Extension Status Update

Good afternoon Mr. George,

I wanted to reach out and provide you with an update on the latest status of Greene County's Kansas Extension project. Last Thursday (3/2/17), our staff received notification that both MoDOT and Federal Highway Administration have now signed and authorized the release of our Environmental Assessment report documents for public review and comment. As of today, those signed documents are available electronically for public viewing via our Greene County website. Below is a link to that webpage:

https://www.greenecountymo.gov/highway/future_projects.php NOTE: These documents are rather large in file size (50MB and 85MB, respectively) and will take a few moments to download for viewing.

Greene County will be hosting a public open house meeting on Thursday, March 23rd from 6pm to 8pm at the Wanda Gray Elementary School here in Springfield. During that meeting, we'll have several members of our project engineering team available to help answer questions pertaining to the various data that is inclusive within the EA report. Following the public meeting event, our staff will continue to collect public comments up through April 7th.

Just wanted to keep you posted on this latest milestone that has been reached. Please let us know if you have any project questions that we can help to address.

Sincerely,

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

From: George, Tom [<mailto:tgeorge@spencerfane.com>]
Sent: Wednesday, January 11, 2017 2:12 PM
To: Adam Humphrey <AHumphrey@greenecountymo.gov>
Subject: RE: Kansas Expressway Extension Status Update

Adam,

Thank you for the update. Please keep me in the loop if something changes.

Thanks,
Tom

Tom George Attorney
Spencer Fane LLP

1700 Lincoln Street, Suite 2000 | Denver, CO 80203
O 303.839.3708
TGeorge@spencerfane.com | spencerfane.com

From: Adam Humphrey [<mailto:AHumphrey@greenecountymo.gov>]
Sent: Wednesday, January 11, 2017 1:07 PM
To: George, Tom
Subject: RE: Kansas Expressway Extension Status Update

Hello Tom,

Since the last time that you and I corresponded, there has been considerable progress made towards the completion of our Environmental Assessment (EA) document, but still no change regarding the document's formal approval status. Another round of reviews/comments was recently completed by our engineering consultant, ultimately culminating in an updated report being resubmitted to Federal Highway Administration (FHWA) on December 19th. These latest EA report documents are now awaiting another review from FHWA, and potentially MoDOT staff as well. I expect that we could quite possibly receive our formal approval notification any time now, or we could end up with some additional comments to address in the report.

Wish I could tell you something more definitive at this point, but we're continuing to work through this review process which involves a lot of oversight from several different state and federal agencies. In the meantime, please feel free to contact me anytime if you have any other questions.

Thanks!

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

From: George, Tom [<mailto:tgeorge@spencerfane.com>]
Sent: Tuesday, January 10, 2017 11:55 AM
To: Adam Humphrey <AHumphrey@greencountymo.gov>
Subject: RE: Kansas Expressway Extension Status Update

Hi Adam,

I am just touching base with you regarding the Kansas Expressway Extension. I have not seen or heard anything regarding the EIS. Could you please share any update you may have on the status of the EIS review and the project generally?

Thanks,
Tom

Tom George Attorney
Spencer Fane LLP

1700 Lincoln Street, Suite 2000 | Denver, CO 80203
O 303.839.3708
TGeorge@spencerfane.com | spencerfane.com

From: Adam Humphrey [<mailto:AHumphrey@greencountymo.gov>]
Sent: Thursday, November 3, 2016 6:56 AM
To: George, Tom
Subject: RE: Kansas Expressway Extension Status Update

Good morning Tom,

I apologize for the delay in responding to your question regarding the current status of our Kansas Expressway Extension project. Our engineering consultant has just recently resubmitted the latest draft of our Environmental Assessment report to both MoDOT and FHWA on Tuesday, November 1st of this week. I haven't received any definitive word from either of these agencies regarding their anticipated timeline for completion of this latest review cycle, but we believe that this submittal will be approved as the "final draft" version of the document, following the internal review by their respective staff members. If there are no additional questions or comments generated during this latest review period, I would anticipate that the document will be approved and signed by both FHWA & MoDOT within the next month or two.

Once we receive the signed federal document, we'll be posting it for public review in a number of locations – including our website. I will send you a copy (or a link) as soon as we're authorized to release the information to the public.

Sincerely,

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

From: George, Tom [<mailto:tgeorge@spencerfane.com>]
Sent: Friday, October 28, 2016 10:29 AM
To: Adam Humphrey <AHumphrey@greencountymo.gov>
Subject: RE: Kansas Expressway Extension Status Update

Hi Adam,

I am just reaching out to touch base on the status of the proposed Kansas Expressway Extension. I have not seen any news regarding the EIS. Any updates you could share?

Thanks in advance,
Tom

Tom George Attorney
Spencer Fane LLP

1700 Lincoln Street, Suite 2000 | Denver, CO 80203
O 303.839.3708
TGeorge@spencerfane.com | spencerfane.com

From: Adam Humphrey [<mailto:AHumphrey@greencountymo.gov>]
Sent: Tuesday, August 30, 2016 12:33 PM
To: George, Tom
Subject: RE: Kansas Expressway Extension Status Update

Good afternoon Mr. George,

Our engineering consultant received comments back from FHWA a couple of weeks ago following their latest review of the Kansas Extension Environmental Assessment (EA) document. We have a meeting scheduled this Friday, September 2nd between FHWA, MoDOT, and our project design team to discuss some of these remaining comments/questions with a goal of finalizing any necessary changes to this document as soon as possible. Federal Highway Administration has recently encountered a backlog of projects that have required quite a bit of their staff's time and review efforts, and it has simply taken more time than I had anticipated to move through their review process.

Please know that you have, indeed, been added to our project contact list for any future updates as they become available. At the present time, there simply hasn't been any new information to share until we receive approval to present the draft EA documents for public review. Looks like we're very close to reaching that milestone, but we should know a little more after our upcoming meeting.

Hope this helps to bring you up to speed on the latest progress. We'll keep you posted once we have something more definitive to report.

Sincerely,

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

From: George, Tom [<mailto:tgeorge@spencerfane.com>]
Sent: Tuesday, August 30, 2016 10:42 AM
To: Adam Humphrey <AHumphrey@greenecountymo.gov>
Cc: Kory Armstrong (karmstrong@envsi.com) <karmstrong@envsi.com>
Subject: Kansas Expressway Extension Status Update

Hi Adam,

You will recall that we spoke by phone about a month ago regarding the Kansas Expressway Extension. It was our understanding that Federal Highways and MoDOT were hoping to finalize and release the public draft of the EA at the end of this month. With September nearly upon us, could you please let us know whether that is still the plan, or when the draft is expected?

Also, when we spoke you offered to add my email address to the news/updates list for the project. If you haven't done so, could you please? I haven't received any updates, but realize that might be because there aren't any.

Thanks,
Tom

Tom George Attorney
Spencer Fane LLP

1700 Lincoln Street, Suite
2000 | Denver, CO 80203
☎ 303.839.3708
TGeorge@spencerfane.com
| spencerfane.com



SpencerFane

File No. 5022103-0004

THOMAS N. GEORGE
DIRECT DIAL: 303.839.3708
tgeorge@spencerfane.com

March 15, 2017

**VIA CERTIFIED MAIL AND E-MAIL
RECEIPT NO.: 7011 0470 0000 6280 4844**

Adam Humphrey, Assistant Administrator
Greene County Highway Department
2065 N. Clifton Ave.
Springfield, MO 65803
AHumphrey@greencountymo.gov

**Re: Kansas Expressway Extension Project Environmental Assessment; Request for
Extension of Comment Period Until June 6, 2017**

Dear Mr. Humphrey,

Our firm represents the Timberbrook Property Owners Association of the Timberbrook Subdivision in Springfield, Missouri (the "Homeowners") in connection with the proposed Kansas Expressway Extension project. For the reasons stated herein, the Homeowners respectfully request an extension of time of 60 days up to and including June 6, 2017, to provide comments on the Kansas Expressway Extension Project Environmental Assessment.

The Timberbrook Subdivision is generally located north of Weaver Road and west of Kansas Avenue in southern Springfield. As proposed, the alignment of the Kansas Expressway Extension project would abut and pass through the Timberbrook Subdivision, directly and significantly impacting the Homeowners.

Greene County, the Federal Highway Administration, and the Missouri Department of Transportation (the "Cooperating Agencies") released their Environmental Assessment for the proposed Kansas Expressway Extension project on March 7, 2017 (the "EA"), after several years of preparation and internal review. The EA is comprised of more than 500 pages of information, tables, figures, and appendices.

Currently, the Cooperating Agencies intend to hold only one public meeting regarding the EA on March 23, 2017, and public comments on the EA are due April 7, 2017. This timeline leaves the public, including the Homeowners, approximately two weeks to review the EA prior to the only public meeting, and two weeks to prepare comments following the only public meeting. This schedule does not afford the public or the Homeowners adequate time to review, discuss, and prepare comments on the EA, including scheduling and holding homeowner meetings as necessary.

The Homeowners' requested extension of 60 days is reasonable considering the size, complexity, and importance of the EA, and in comparison to the length of time which the Cooperating Agencies needed to conduct their recent internal reviews. This request will not cause undue delay and will allow the public, including the Homeowners, adequate time to review the voluminous EA, to meet and discuss it among themselves, and to provide meaningful comments to the Cooperating Agencies.

WA 9406500.1

March 13, 2017
Page 2

Thank you for your time and consideration of the Homeowners' request. Please do not hesitate to contact me with questions or to discuss this matter further.

Sincerely,



Thomas N. George

cc: Brent Brown, President, Timberbrook Property Owners Association (brent@btecorp.net)

Samuelson, Kathryn A (Kate)

From: Herleth, Michael
Sent: Friday, March 17, 2017 7:04 AM
To: Samuelson, Kathryn A (Kate)
Subject: FW: STP-5909(802) - Kansas Extension Project - Request for EA Public Comment Period Extension
Attachments: 3-15-17 Letter from Spencer Fane Law Firm - Requesting Extension of Public Comment Period.pdf
Follow Up Flag: Follow up
Flag Status: Completed

Kate, please add to the FONSI correspondence file. We may need to keep track of this in a separate subfolder. thanks

From: Adam Humphrey [mailto:AHumphrey@greenecountymo.gov]
Sent: Thursday, March 16, 2017 4:14 PM
To: Ball, Raegan (FHWA) <raegan.ball@dot.gov>; Matthew Burcham <Matthew.Burcham@modot.mo.gov>
Cc: DeBacker, Michael <mdebacker@burnsmcd.com>; Rick Artman <rartman@greenecountymo.gov>; Thornhill, Steve <sthornh@burnsmcd.com>; Herleth, Michael <mherleth@burnsmcd.com>
Subject: STP-5909(802) - Kansas Extension Project - Request for EA Public Comment Period Extension

Good afternoon Reagan & Matt,

Attached to this email is a letter that was received by our Greene County Highway Department yesterday evening regarding the advertised public comment period deadline for the above referenced roadway project. The letter was submitted to our staff by the Spencer Fane law firm, on behalf of the Timberbrook Subdivision Property Owner's Association, requesting a 60-day time extension for public comments on the Environmental Assessment report documents. The Timberbrook Subdivision is located immediately adjacent to our project study corridor, and their letter states that these residents have not been afforded "adequate time to review, discuss, and prepare comments on the EA, including scheduling and holding homeowner meetings as necessary" under the currently specified public comment deadline of April 7th.

Upon our review of this time extension request, our Greene County staff has some concerns regarding the impacts that a 2-month delay could have on our overall project delivery timeline. We believe that a 2-week time extension of the public comment period, which would result in a new public comment deadline of April 21st, would be reasonable and sufficient in allowing adequate time for residents to review, discuss, and prepare their comments. Our project team certainly desires to be as accommodating as we possibly can to the public's interests in this project. But, we also wish to balance those interests with our responsibility to be accountable to our project delivery commitments with local planning partners, coordinating agencies, and the community at-large.

By means of this correspondence, I would request that MoDOT and FHWA please review the attached letter from the Timberbrook Property Owner's Association and let us know how you wish to proceed. Feel free to call or email me if you have any questions or need additional information from Greene County as you consider this public request.

Sincerely,

Adam Humphrey, P.E.
Assistant Administrator



County of **GREENE** *State of Missouri*

GREENE COUNTY HIGHWAY DEPARTMENT

2065 N CLIFTON, SPRINGFIELD, MO 65803

FAX (417) 831-5216

(417) 831-3591



BOB CIRTIN

Presiding Commissioner

HAROLD BENGSCHE

Commissioner 1st District

LINCOLN P. HOUGH

Commissioner 2nd District

RICK ARTMAN

Administrator

March 20, 2017

Mr. Thomas N. George
Spencer Fane LLP
1700 Lincoln Street, Suite 2000
Denver, CO 80203-4554

**RE: Kansas Extension Project – Environmental Assessment Report
Request for Extension of Comment Period Until June 6, 2017**

Dear Mr. George,

This letter is being provided in response to the recent request that was received from your office, on behalf of the residents within the Timberbrook Property Owners Association, asking for a sixty (60) day extension of the public comment period for the Environmental Assessment (EA) report on Greene County's Kansas Extension Project.

Upon review of the Homeowner's request that we provide additional time to allow residents to "review the voluminous EA, to meet and discuss it among themselves, and to provide meaningful comments to the Cooperating Agencies", and based upon our consultation with both MoDOT and Federal Highway Administration staff, we are in agreement to provide an additional fifteen (15) days of public comment period. We believe that this additional time, which will result in a new public comment deadline of April 22nd, will afford the Timberbrook Property Owners Association adequate time to provide meaningful comments regarding the content of this EA report.

Please note that, although the EA documents consist of more than 500 pages of information, the actual EA report is considerably shorter in length and has been written with the intent of providing the public with a complete summary of the raw data, reports, tables, and figures that are comprised within the Appendices as per federal guidance. Based upon all of the EA data that has been compiled to date and pending the outcome of our public comment period, the proposed study corridor does not currently appear to "significantly impact" the residents of the Timberbrook Subdivision.

Our Greene County staff, in cooperation with MoDOT and FHWA, certainly endeavors to be as accommodating as we can to the Timberbrook homeowners and to all members of the general public. We would ask that you please understand that we are also tasked with the responsibility to be accountable to our overall project delivery commitments with local planning partners, coordinating agencies, and the community at-large. By means of providing this time extension, which will result in a total public comment period of forty-five (45) days, we believe that all of these stated project objectives can be amply satisfied.

Again, we invite all of the homeowners to please join us for the upcoming Public Hearing scheduled for Thursday (3/23) from 6pm to 8pm at Wanda Gray Elementary School. Thank you for sharing your project input with our staff.

Sincerely,

A handwritten signature in blue ink, appearing to read "Adam Humphrey", with a large, stylized flourish extending to the right.

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department

Cc: Raegan Ball, FHWA
Matthew Burcham, MoDOT

Samuelson, Kathryn A (Kate)

From: Herleth, Michael
Sent: Monday, March 20, 2017 4:11 PM
To: Samuelson, Kathryn A (Kate)
Cc: DeBacker, Michael; Thornhill, Steve
Subject: FW: Kansas Extension Project - Request for EA Public Comment Period Extension
Attachments: 03-20-17 Letter to Thomas George of Spencer Fane LLP.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Please add to the file. thanks

From: Adam Humphrey [mailto:AHumphrey@greencountymo.gov]
Sent: Monday, March 20, 2017 4:07 PM
To: George, Tom <tgeorge@spencerfane.com>
Cc: Doug Pitt <dougpitt@icloud.com>; Brent Brown <Brent@btecorp.net>; Ball, Raegan (FHWA) <raegan.ball@dot.gov>; Matthew Burcham <Matthew.Burcham@modot.mo.gov>
Subject: RE: Kansas Extension Project - Request for EA Public Comment Period Extension

Good afternoon Mr. George,

Attached to this email is a scanned copy of a letter on behalf of Greene County, which is being provided in response to your recent inquiry/request regarding the Kansas Extension project. The original hard copy is being mailed out to your Denver, CO address for your files. Please let us know if you have any questions.

Thanks!

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

From: George, Tom [<mailto:tgeorge@spencerfane.com>]
Sent: Friday, March 17, 2017 4:53 PM
To: Adam Humphrey <AHumphrey@greencountymo.gov>
Subject: RE: 3-15-17 Letter re Kansas Expressway Expansion Project

Great. Thank you, Adam.

Have a nice weekend.
Tom

Tom George Attorney
Spencer Fane LLP

1700 Lincoln Street, Suite 2000 | Denver, CO 80203
O 303.839.3708
TGeorge@spencerfane.com | spencerfane.com

From: Adam Humphrey [<mailto:AHumphrey@greencountymo.gov>]
Sent: Friday, March 17, 2017 3:36 PM
To: George, Tom
Subject: RE: 3-15-17 Letter re Kansas Expressway Expansion Project

Hello Tom,

Yes, I can confirm that we've received your letter and have forwarded the correspondence along to our project liaisons at both MoDOT and FHWA. I anticipate a response very soon and will certainly let you know as soon as a decision has been made.

Thanks!

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

From: George, Tom [<mailto:tgeorge@spencerfane.com>]
Sent: Friday, March 17, 2017 4:29 PM
To: Adam Humphrey <AHumphrey@greencountymo.gov>
Cc: brent@btecorp.net; Doug Pitt (dougpitt@icloud.com) <dougpitt@icloud.com>
Subject: RE: 3-15-17 Letter re Kansas Expressway Expansion Project

Adam,

Could you please confirm that you received the below email and the Homeowners' request for an extension of time to comment on the EA? Also, could you please let us know as soon as possible when the Co-Lead Agencies have decided whether to grant an extension? As you know, time is of the essence.

Thanks
Tom

Tom George Attorney
Spencer Fane LLP

1700 Lincoln Street, Suite 2000 | Denver, CO 80203
O 303.839.3708
TGeorge@spencerfane.com | spencerfane.com

From: Garofalo, Lori A.
Sent: Wednesday, March 15, 2017 4:21 PM
To: AHumphrey@greencountymo.gov
Cc: brent@btecorp.net; George, Tom
Subject: 3-15-17 Letter re Kansas Expressway Expansion Project

Mr. Humphrey,

Good afternoon. Attached please find a letter prepared by Thomas N. George of our firm. Should you have any questions concerning this matter, please contact Mr. George directly at (303) 839-3709. Thank you.

Lori A. Garofalo Legal Administrative Assistant

to Thomas N. George
Spencer Fane LLP

1700 Lincoln Street, Suite 2000 | Denver, CO 80203
☎ 303.839.3877
lgarofalo@spencerfane.com | spencerfane.com



JASON C. SMITH
DIRECT DIAL: 417.888.1013
jcsmith@spencerfane.com

File No. 5022103-4

April 21, 2017

SENT VIA CERTIFIED MAIL AND E-MAIL

Adam Humphrey, Assistant Administrator
Greene County Highway Department
2065 N. Clifton Ave.
Springfield, MO 65803
AHumphrey@greencountymo.gov

**Re: Comments on Kansas Expressway Extension Project Draft Environmental
Assessment; March 7, 2017; Federal Aid No. STP-5909 (802)**

Dear Mr. Humphrey:

This letter and the comments herein are submitted on behalf of Brent Brown, Doug Pitt, Justin French and Michael Sutton (the “Homeowners”) regarding the draft Kansas Expressway Extension Project Environmental Assessment (the “EA”) released March 7, 2017. Each of the Homeowners owns property and resides within the EA’s Study Area.

As proposed, the alignment of the Kansas Expressway Extension project (the “Project”) would pass through the Homeowners’ community, directly impacting the Homeowners, their properties, and their community. The Homeowners and a number of their representatives have participated in the public process associated with the Project over the past several years and have provided input at each limited opportunity. Numerous other homeowners who own property and/or reside within or in close proximity to the EA’s Study Area have also expressed their support for the comments submitted herein.

The Homeowners appreciate the opportunity to review the EA and provide the comments detailed herein. While the Homeowners have endeavored to review the EA thoroughly and to provide comprehensive comments, it is possible that the Homeowners will have additional comments on the EA and the EA process, and the Homeowners reserve the right to provide further comments at a later date, if warranted.

For the purposes of convenience and clarity, the Homeowners’ comments are separated below into General Comments and Specific Comments specific to each section of the EA as identified. All capitalized terms used in this comment letter are intended to have the meaning attributed to them in the EA unless otherwise defined.

WA 9595474.1



Adam Humphrey
April 21, 2017
Page 2

Thank you in advance for your time and careful consideration of the Homeowners' comments and concerns regarding the EA and the Project.

I. GENERAL COMMENTS

1. As described in greater detail below, in its current form the EA is incomplete, inadequate, and insufficient to meet the requirements of NEPA. Greene County, the Federal Highway Administration, and the Missouri Department of Transportation (the "Cooperating Agencies") failed to adequately investigate, study, and analyze the potential impacts to a number of identified and significant resources associated with the Project. As a result, the Cooperating Agencies have failed to prepare an environmental assessment that adequately addresses the direct, indirect, and cumulative adverse impacts of the Project or adequately considers mitigation of the adverse impacts of the Project. Further, the Cooperating Agencies' and the EA's inadequate investigation, study, and analysis preclude the full and proper consideration and characterization of potential Project impacts. The Cooperating Agencies need to conduct further investigations, study, and analyses of the potential Project impacts to a number of identified and significant resources.
2. As described in greater detail below, the EA is inadequate and incomplete because it improperly proposes to delay a number of analyses regarding reasonably foreseeable direct and indirect impacts of the Project until a later date, such as Project design or construction phases. Rather than conducting these analyses and presenting the findings in the EA, the Cooperating Agencies offer assurances of future additional assessment and study. However, such assurances cannot obviate the need for compliance with NEPA regulations. The Cooperating Agencies need to conduct investigations, study, and analysis of all reasonably foreseeable direct and indirect impacts of the Project and present the findings to the public.
3. As described in greater detail below, the Homeowners are concerned that without further study of the potential Project impacts, and if the Project proceeds as currently proposed, the Project will violate the Endangered Species Act.
4. As described in greater detail below, the EA does not fully, fairly, and adequately assess the proposed alternatives, including the No Action (No Build) Alternative, because the EA demonstrates a clear and unfair bias for the Preferred Alternative. The Cooperating Agencies should reevaluate each of the proposed alternatives in a fair and unbiased manner and prepare an unbiased environmental assessment.
5. As described in greater detail below, the EA does not fully, fairly, and adequately assess the proposed alternatives, including the No Action (No Build) Alternative, because the

Adam Humphrey
April 21, 2017
Page 3

Cooperating Agencies irreversibly and irretrievably committed themselves to the Preferred Alternative and the Project's proposed alignment prior to the preparation of the EA. The Cooperating Agencies should reevaluate each of the proposed alternatives in a fair and unbiased manner and prepare an unbiased environmental assessment.

6. As described in greater detail below, the EA potentially fails to accurately characterize a number of identified impacts to the quality of the human environment as substantial and/or significant. To the extent identified impacts are significant, the Cooperating Agencies should prepare a Notice of Intent to prepare an Environmental Impact Statement (EIS) and proceed with an EIS process.
7. For all of the reasons described in greater detail herein, the Homeowners do not support the Cooperating Agencies' selection of the Preferred Alternative and, if an alternative is to be selected, urge the Cooperating Agencies to select the No Build Alternative as the preferred alternative at this time.

II. SPECIFIC COMMENTS

For convenience and clarity, the comments that follow are separated to correspond with the sections of the EA as identified by each section's heading.

1.0 Purpose and Need for Action

The EA and the Preferred Alternative (as identified in the EA) fail to meet the stated purpose and need for the proposed action because neither the EA nor the Preferred Alternative consider or include improvements or enhancements to Campbell Avenue (Hwy 160), to the east-west connections between Campbell Avenue and the Project, or beyond the southern terminus of the Project. Further, the stated purpose and need exhibit a clear bias against the No Action (No Build) Alternative.

The EA identifies the study purpose as follows:

The study purpose is to improve north/south connectivity for area residents from the growing areas in southern Greene County and northern Christian County to the employment centers, recreational areas, and retail centers in the City of Springfield. More specifically, the issues that the Study is meant to address include:

1. Improve the functionality of the Cox Road corridor by reducing the amount of commuter traffic along this primarily residential, "secondary arterial" street.



Adam Humphrey
April 21, 2017
Page 4

2. Improve the regional transportation network by adding an additional north-south corridor, improving system-wide travel times, reducing travel delays, and improving safety.

3. Provide needed network improvements to accommodate existing and projected growth in the southern Springfield/Greene County area.

(EA at 1-2).

The EA summarizes the purpose and need as follows:

Due to historical and continued development in southern Springfield, Greene County, and in northern Christian County, a large number of commuters are coming into Springfield from the south. The relative lack of sufficient north-south routes into the area results in increased traffic congestion and a higher crash rate compared to statewide averages. Congestion and higher crash rates are expected to continue to increase over the next 20 to 30 years.

(EA at 1-12).

The EA describes Cox Road as follows:

The Cox Road corridor is classified as a “secondary arterial” – primarily residential with direct access from numerous residential driveways. Secondary arterials, as outlined in the OTO Journey 2035 – Long Range Transportation Plan, 2011 (OTO, 2011), are intended for moderate traffic volumes traveling at moderate speeds, usually less than 35 miles per hour. . . . Cox Road was not intended to serve as a high volume and longer-distance commuter facility.

(EA at 1-6).

The EA describes Campbell Avenue as follows:

This segment is already approaching capacity and can handle only minimal additional traffic growth. As traffic grows and congestion increases, commuters are finding alternative routes to get to their destinations, which explains in part why the increase in traffic just south of the James River Expressway is less than the increases along other sections of Campbell Avenue. As shown in Table 1-6, traffic is diverting both east and west of Campbell Avenue on both Weaver Road and Plainview Road. Vehicles diverting west are using Cox Road or Kansas Avenue to then go north on the

Adam Humphrey
 April 21, 2017
 Page 5

Kansas Expressway. Vehicles diverting east are heading north on National Avenue.

(EA at 1-10, 1-11).

The Preferred Alternative ostensibly meets the stated purpose and need, as outlined above, and will relieve north-south congestion along Campbell Avenue and Cox Road by providing an alternative north-south route. However, the Preferred Alternative and the EA fail to address the existing identified problems associated with current east-west travel along Weaver Road and Plainview Road, and problems associated with increased traffic on Cox Road beyond the southern terminus of the Project. These problems will only be exacerbated by the proposed Project.

For example, as indicated in Table 1-6, reproduced below, traffic is expected to increase drastically along Weaver Road and Plainview Road during the study period.

Table 1-6: Existing and Forecasted Diversion of Traffic from Campbell Avenue (AADT)

Location	Average Number of Vehicles per Day		Avg. Growth (%)
	Existing (2015)	Future (2040)	
West on Weaver Road	7,480	10,070	34.6
East on Weaver Road	4,360	6,860	57.3
West on Plainview Road	9,540	16,830	76.4
East on Plainview Road	6,370	9,680	52.0

Source: OTO Travel Demand Model, 2015

If the Project is completed as proposed and as intended it will draw a portion of the current traffic from Cox Road and an increasing amount of traffic from Campbell Avenue to the Project. However, the EA fails to address the potential impacts associated with the Project's effect of increasing traffic along Weaver Road and Plainview Road and does not propose any enhancements or modifications to either. In this regard the Preferred Alternative fails to meet stated purpose and need to "[p]rovide needed network improvements to accommodate existing and projected growth in the southern Springfield/Greene County area."

Further, the Preferred Alternative is proposed to terminate on its southern end at Farm Road 190, including an east-west connection with Cox Road (*see* EA at 2-3); but the Preferred Alternative does not include any additional improvements beyond the southern terminus of the Project where the proposed roadway merely reconnects with Cox Road. Cox Road will continue to be a secondary arterial. By connecting the substantial projected traffic of the Project, as projected in the above table, back to Cox Road without any additional improvements or enhancements to Cox Road or elsewhere beyond the southern terminus, the Preferred Alternative will only exacerbate existing problems at the



Adam Humphrey
April 21, 2017
Page 6

southern end of the route. This fails to the meet stated purpose and need to “[i]mprove the functionality of the Cox Road corridor” or “[p]rovide needed network improvements to accommodate existing and projected growth in the southern Springfield/Greene County area.”

Further still, while the EA recognizes that Campbell Avenue is “already approaching capacity and can handle only minimal additional traffic growth,” the EA fails to propose any improvements or enhancements to Campbell Avenue. By identifying a significant problem but failing to even remotely address it, the Preferred Alternative fails to the meet stated purpose and need to “[p]rovide needed network improvements to accommodate existing and projected growth in the southern Springfield/Greene County area.”

Finally, insofar as the EA identifies the purpose and need generally as to “[i]mprove the regional transportation network by adding an additional north-south corridor” in order to correct “[t]he relative lack of sufficient north-south routes,” the stated purpose and need of the Project patently disregards any alternative associated with making improvements to the existing corridors or routes and exhibits a clear bias against the No Action (No Build) Alternative. In order words, it is as if the stated purpose and need for the Project were nothing more than “build the Preferred Alternative.”

In order to fully and fairly provide the required environmental assessment, the Cooperating Agencies should develop and consider an unbiased purpose and need that allows consideration of all potential alternatives and incorporates a comprehensive perspective to solving the existing traffic problems along all roadways in the region.

2.0 Alternatives Considered

The EA does not fully, fairly, or adequately consider all alternatives because the EA and the Cooperating Agencies exhibit a clear bias for the Preferred Alternative and against the No Action (No Build) Alternative. Further, it appears as though the Cooperating Agencies may have violated NEPA by predetermining the outcome of the environmental analysis prior to conducting the EA.

The Preferred Alternative is described as follows:

The preferred alternative (Alternative 15-1) would extend from the northern terminus at the intersection of Kansas Expressway and Republic Road south to the southern terminus at Farm Road 190, including an east-west connection between Cox Road and the Kansas Expressway at the southern Study limit. This alternative would solve the transportation problems identified in the Purpose and Need section of this document by shifting more traffic from the Cox Road corridor, provide a newer, safer relief route for existing and future traffic; provide a better transportation network to accommodate existing and projected growth; as well as provide improve linkages to the area trail



Adam Humphrey
April 21, 2017
Page 7

networks. Initially, the preferred alternative would be constructed as a two lane facility and eventually a four lane facility once traffic conditions warrant.

(EA at 2-9).

The EA provides that the Preferred Alternative was selected for the following reasons:

Based on the results of previous planning efforts and the screening process described in Appendix A, the current Build Alternative (Alternative 15-1), is recommended as the preferred alternative (Figure 2-1). This alternative best addresses the Purpose and Need for the Project, limits disruption to the natural and social environment, and was developed in consideration of input received from the public and environmental resource agencies.

[. . .]

The preferred alternative would extend from the northern terminus at the intersection of Kansas Expressway and Republic Road to the southern terminus at Farm Road 190, including an east-west connection between Cox Road and the Kansas Expressway at the southern Study limit. Initially, the preferred alternative would be constructed as a two lane facility and eventually expanded to a four lane facility once traffic conditions warrant.

The [Preferred Alternative] would result in a substantial diversion of traffic from both Cox Road and from Campbell Avenue. As illustrated in Figure 2-2, 11,000 to 17,000 vehicles per day are expected to divert from existing facilities to the Study Corridor by the year 2040. The trips generated along the Study Corridor would primarily consist of:

1. Current trips diverting from Cox Road – 5,000 to 6,000 trips per day
2. Current trips diverting from Campbell Avenue – 3,000 to 4,000 trips per day
3. Current trips diverting from National Avenue – 1,000 to 2,000 trips per day
4. New trips diverting from other locations – 2,000 to 5,000 trips per day

(EA at 2-2, 2-4).

As described in the comments on Section 1.0, above, the EA and the Cooperating Agencies exhibit a clear bias for the Preferred Alternative and against the No Build Alternative from the outset, as demonstrated in the crafting of the identified Purpose and Need for the EA. Indeed, partway through the EA and after defining the “Preferred Alternative,” the EA document begins to use the term “Build Alternative” in the place of “Preferred Alternative.” The usage of “Build Alternative,” when a



Adam Humphrey
April 21, 2017
Page 8

number of different alternatives included certain build components, in the place of “Preferred Alternative” further demonstrates the Cooperating Agencies’ underlying bias for the Preferred Alternative as the only acceptable alternative among the myriad build alternatives available for consideration.

Further, it appears the Cooperating Agencies may have violated NEPA by predetermining the outcome of the environmental analysis in the EA, and Greene County may have irreversibly and irretrievably committed itself to the Preferred Alternative and the Project’s proposed alignment by actively acquiring right-of-way through the Study Area over the past several decades.

For example, as expressly admitted in the EA, “[t]hrough negotiations with property owners and developers working through the Greene County Subdivision process, more than 90 percent of the mapped corridor from Republic Road south to Steinert Road (Farm Road 186) was acquired by Greene County between 1995 and 2005.” (EA at 1-1, 1-2).

Further examples of Greene County’s premature commitment to the Preferred Alternative can be found in Table 5-2 of the EA, Summary of Comments and Questions from Questionnaire, which provides the following comments and agency responses:

Comment: Can the curve near the Royal Oaks subdivision be moved farther east?

Response: The roadway has been laid out to best fit within the limits of the property owned by Greene County. The alignment of the new roadway may be slightly adjusted during the final design process.

Comment: Why does the road follow the homes in the Lennox Place subdivision when the county owns the land adjacent to the corridor? Can this part of the road be straightened to increase distance from homes?

Response: The new roadway lies within the property dedicated to Greene County. The alignment of the roadway near Lennox Place may be slightly adjusted during the final design process.

(EA at 5-6, 5-7).

As clearly admitted in the EA, Greene County previously and prematurely (beginning more than 20 years ago) took affirmative actions to acquire large portions of the right-of-way necessary for implementation of the Preferred Alternative, and Greene County has allowed its prior actions and ownership interests to influence the formation and selection of the Preferred Alternative. As a result, because Greene County already owns large portions of the Preferred Alternative’s proposed right-of-



Adam Humphrey
April 21, 2017
Page 9

way, the Cooperating Agencies have irreversibly and irretrievably committed themselves to a plan of action that is dependent upon the NEPA environmental analysis producing a certain outcome—adoption of the Preferred Alternative—before the required environmental analysis was commenced or is complete.

The environmental assessment process is supposed to involve an objective, good faith inquiry into the environmental consequences of the proposed action, and full and fair consideration of all alternatives. Instead, as expressly demonstrated in the EA, the Cooperating Agencies did not adequately assess all alternatives and demonstrated a clear predetermined bias for the Preferred Alternative.

Due to the clear and self-proclaimed bias of Greene County, the entire EA and especially its preference for the Preferred Alternative and assessment of its potential environmental impacts is tainted. A full and fair analysis of all alternatives and their environmental impacts must be conducted by the Cooperating Agencies in order to comply with the requirements of NEPA.

3.0 Impacts of the Proposed Action

3.1 Land Use

The EA does not correctly characterize the Study Area or adequately recognize the intrinsic value of the Study Area as undeveloped, wooded open space. As a result, the EA does not adequately consider the direct impacts the Project and Preferred Alternative would have on Land Use in the Study Area.

The EA describes the Study Area as consisting of primarily “residential development, with some commercial/office areas, planned development, and other areas classified as plot assignment districts,” and concludes that “[t]he Build Alternative will not directly impact any identified public facility or service, including schools, religious facilities, parks, recreational facilities or transit services.” (EA at 3-2).

The Study Area is indeed a primarily residential area, but a vast majority of the Study Area is undeveloped, wooded open space. The Preferred Alternative would require the removal of approximately 45 acres of trees and the construction of a four lane roadway right through the middle of undeveloped open space. Undeveloped open space such as this is increasingly rare in the southern Springfield area, and while its value and positive impact on the community are difficult to quantitatively assess, its importance to the character of the community, including the schools, parks, recreational opportunities, and religious facilities in the area, cannot be overstated.



Adam Humphrey
April 21, 2017
Page 10

The EA should correctly identify and characterize the Study Area as containing primarily undeveloped, wooded open space and provide a description of the direct impacts the Preferred Alternative would have thereto, including impacts relative to applicable land use and community plans in the area.

3.2 Socioeconomics and Environmental Justice

The EA does not adequately analyze the Project's potential socioeconomic and environmental justice impacts because the EA mischaracterizes the Study Area and fails to recognize the intrinsic value of the Study Area to the community as undeveloped, wooded open space.

The EA concludes generally that the Project will have only positive socioeconomic impacts on the Study Area. This conclusion is based in large part on the characterization of the Study Area as follows:

Because much of the Study Area is dominated by residential land uses, areas with the opportunity for economic growth and development are located at the north and south ends of the Study Corridor. [. . .] The Study Area is currently made up of a number of distinct neighborhoods. There is not currently connectivity between these neighborhoods or between the neighborhoods and other facilities and services beyond the existing road network.

(EA at 3-18).

Similar to Section 3.1, Land Use, this portion of the EA mischaracterizes the Study Area and fails to recognize the innate value of the Study Area to the community as undeveloped, wooded open space. In turn, the EA does not adequately analyze the direct impacts associated with drastically altering the character of the Study Area as proposed by the Project.

Further, rather than being constructed in a number of distinct neighborhoods with no connectivity between them as described in the EA, as proposed the Project would in reality bisect and disconnect neighbors and neighborhoods that comprise a larger community. The community is larger than any one neighborhood, especially in regard to the schools and religious institutions in the area. The EA offers no assessment of the potential impacts caused by the Project to the human environment of the larger community.



Adam Humphrey
April 21, 2017
Page 11

Further still, the EA fails to assess the potential impacts to private property and home values in the Study Area. As described above, as proposed the Project would bisect the larger residential community and replace the stillness of undeveloped, wooded open space with a four lane roadway. The proposed Project would drastically and negatively alter the character of the Study Area, directly and negatively impacting private property and home values.

The EA should correctly identify and characterize the Study Area as containing primarily undeveloped, wooded open space and provide a description of the direct impacts the Preferred Alternative would have on the socioeconomics and environment of the community related thereto.

3.3 Right-of-Way Acquisition

Similar to Sections 3.1 and 3.2, as described above, this section of the EA fails to adequately recognize the value of the Study Area to the community as undeveloped, wooded open space. As a result, the EA does not adequately analyze the impacts associated with removing approximately 45 acres of trees and drastically altering the character of the Study Area as proposed by the Project.

For example, the EA ignores the significant character of the Study Area's undeveloped, wooded open space and concludes plainly that "[p]roperty from ten parcels would be needed to construct the Project, resulting in approximately 19 acres of additional ROW being acquired. These parcels are all currently vacant. It is not anticipated that any residences or businesses would need to be acquired." (EA at 3-20).

The EA should correctly identify the Study Area as containing primarily undeveloped, wooded open space and provide a description of the direct impacts the acquisition of right-of-way and construction of the proposed roadway under the Preferred Alternative would have related thereto.

3.4 Air Quality

The EA identifies the potential for increased air pollution in "a few localized areas," but fails to recognize that the majority of the Study Area is undeveloped, wooded open space, and as proposed the Project will require the removal of approximately 45 acres of trees within a tranquil residential area to replace it with the proposed four lane roadway. As a result, the EA does not adequately identify or assess potential Project impacts to air quality in the Study Area.

Regarding air quality impacts associated with the Preferred Alternative, the EA concludes simply as follows:

[T]he NAAQS and MSAT emissions from the Build Alternative are expected to be the same or lower in the design year (2040) than those from the No Build Alternative in



Adam Humphrey
April 21, 2017
Page 12

the Project area. It is important to note that there could be increases in NAAQS and MSAT emissions in a few localized areas; however, the area as whole is not expected to see a detrimental impact to the air quality between the Build and No Build Alternatives.

(EA at 3-22).

Rather than focusing solely on vehicle emissions in the Study Area to justify selection of the Preferred Alternative, the EA should also identify and assess the air quality impacts directly associated with removing 45 acres of trees and replacing them with a four lane roadway. Further, the EA should assess the direct impact the Project will have on the air quality of the human environment; that is, removing 45 acres of trees and replacing them with a four land roadway in the middle of a residential community.

3.5 Climate Change

The EA does not provide an adequate assessment of potential impacts related to Climate Change because the EA considers only vehicle emissions.

The Council of Environmental Quality's guidance on analyzing the impacts of GHG emissions for NEPA evaluations provides as follows:

The analysis of climate change impacts should focus on those aspects of the human environment that are impacted by both the proposed action and climate change. Climate change can make a resource, ecosystem, human community, or structure more susceptible to many types of impacts and lessen its resilience to other environmental impacts apart from climate change. This increase in vulnerability can exacerbate the effects of the proposed action. For example, a proposed action may require water from a stream that has diminishing quantities of available water because of decreased snow pack in the mountains, or add heat to a water body that is already warming due to increasing atmospheric temperatures. Such considerations are squarely within the scope of NEPA and can inform decisions on whether to proceed with, and how to design, the proposed action to eliminate or mitigate impacts exacerbated by climate change. They can also inform possible adaptation measures to address the impacts of climate change, ultimately enabling the selection of smarter, more resilient actions.

(Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews, August 1, 2016, Section III.B.2., page 21).



Adam Humphrey
April 21, 2017
Page 13

Section 3.5 of the EA analyzes only vehicle emissions associated with the alternatives considered; it fails to address any aspects of the human environment that may be impacted by the proposed action. For example, the EA fails to address climate change related impacts to the streams, vegetation, or wildlife in the Study Area, and the direct impact the Project may have on them and their resilience. Further, the EA fails to address the climate change related impacts to the human environment, in this case a residential community, associated with removing 45 acres of undeveloped, wooded open space to construct a four lane paved roadway.

The EA should provide a complete assessment of the potential impacts associated with climate change in the Study Area in conformance with the Council of Environmental Quality's guidance.

3.6 Noise

The EA does not adequately assess or provide mitigating options for Project noise impacts to the Study Area.

The EA identifies four residential areas that would be impacted by the Project; however, noise barriers are proposed for only two of these areas. (*See* EA Figure 3-11; EA at 3-28). Ostensibly the Cooperating Agencies propose no mitigation for the other two areas whatsoever. The impacted areas identified in the EA are homes. The proposed alignment of the Project will abut a number of residential communities and homes. As described above, most of the Study Area is tranquil, undeveloped, wooded open space. Construction of the proposed Project would remove approximately 45 acres of woods and replace them with a four-lane paved road, directly and substantially increasing noise and impacting numerous homes and homeowners.

The EA identifies potentially significant impacts of noise on the human environment, but it falls short of identifying methods to mitigate those impacts. This analysis is inadequate and incomplete. Further, if the impacts cannot be mitigated, they may be significant impacts which necessitate the preparation of an EIS.

3.7 Water Resources

The EA's assessment of potential impacts to water resources is inadequate and incomplete because it fails to assess the long term impacts associated with construction activities over the full duration of the proposed Project or the lasting impacts of the proposed Project's impermeable roadway.

The EA identifies the following concerns regarding water resources:

Construction near streams and rivers makes it possible for soil to wash into an adjacent the [sic] water body. Over time, increased amounts of sediment can damage



Adam Humphrey
April 21, 2017
Page 14

the river ecosystem by lowering oxygen levels and covering food sources and fish spawning areas. Soil and rock that is washed away can change the river bottom, affecting those species that use the bottom for food or habitat. Without onsite pollution controls, sediment-laden runoff from construction sites could degrade water quality. In addition, stormwater could pick up other pollutants such as concrete washout, paint, used oil, pesticides, or other debris, potentially harming or killing fish and wildlife, degrading aquatic habitat, and affecting drinking water quality.

(EA at 3-31).

Regarding potential impacts to water resources, the EA concludes generally as follows:

Construction-related impacts to water quality would be primarily the result of stormwater runoff. Water quality impacts resulting from construction of the new roadway would be relatively short-term due to the nature of the construction process. [. . .] The Build Alternative would increase stormwater runoff after construction as the area of impermeable pavement would increase. Also, there would be application of compounds used to de-ice roadway surfaces in the Study Corridor once the Project is completed. Use of these chemicals takes place primarily during wet seasons when precipitation dilutes their concentration.

This analysis and these conclusions of the EA are inadequate, first, because they fail to recognize as described elsewhere in the EA that the proposed Project contemplates the initial construction of two travel lanes that would ultimately be built out into a full four lane facility in 15 to 20 years (EA at 2-9). As proposed, the Project is not a short-term, discrete construction project; it is a phased and escalating construction project taking place over 20 years. Thus, the potential impacts to water resources of the proposed construction activities should be assessed over the entire span of the proposed Project construction timeline. The potential impacts in this regard merit further analysis and explanation, and could be substantial or significant.

Second, while the EA identifies that the proposed Project will increase stormwater runoff after construction is complete because it will result in an increased area of impermeable pavement, the EA does not provide any discussion or assessment of the potential impacts related thereto. The EA should provide discussion and analysis regarding the long term impacts to water resources, including the increased burden on existing stormwater facilities, associated with constructing the proposed Project's large impermeable surface.

Finally, as discussed in greater detail in the comments on Section 3.9, below, because the EA does not fully investigate or analyze geologic structures in the Study Area and their possible interconnectedness, without further investigation and study neither the Cooperating Agencies nor the



Adam Humphrey
April 21, 2017
Page 15

public can adequately understand the potential impacts of the Project on water and other interconnected and related resources.

3.8 Aquatic Resources

The EA's assessment of potential impacts to aquatic resources is inadequate and incomplete.

The EA concludes that "[u]nder the Build Alternative, construction of the roadway would result in temporary impacts to two ephemeral streams and two perennial streams that cross the Study Corridor." (EA at 3-39). This conclusion is inadequate because it fails to recognize as described elsewhere in the EA that the proposed Project contemplates a long term, phased project that would take place over 15 to 20 years (EA at 2-9). The potential impacts to aquatic resources should be assessed over the entire span of the proposed Project construction timeline.

The EA's assessment of potential impacts to aquatic resources assessment is by its own admission incomplete. For example, in discussing potential impacts to wetlands and rivers, the EA states "[o]nce the construction plans are finalized, the anticipated impacts of the Build Alternative would be finalized." (EA at 3-39). Further, in describing possible mitigation for potential impacts, the EA states, "[f]ollowing completion of additional studies, the potential impacts to streams and wetlands would determine any need and further course of action for mitigation." The EA expressly identifies the need for additional study to assess potential impacts to aquatic resources; these studies and assessments should be completed and published so the Cooperating Agencies and the public can adequately understand the potential impacts of the Project on aquatic resources.

3.9 Biological Resources and Threatened and Endangered Species

The EA's assessment of potential impacts to biological resources and threatened and endangered species is inadequate, incomplete, and insufficient to meet the requirements of NEPA. If the Project were to proceed on the basis of the EA, the Homeowners are concerned the Project may violate NEPA and the Endangered Species Act (ESA).

For example, the EA identifies eight federally-listed species that may occur within or near the Study Corridor (EA at 3-42). Among the identified species are the Indiana bat, the northern long-eared bat, the gray bat, and the Ozark cavefish. The EA further states that a Preliminary Geologic Evaluation of the Project Corridor was performed and a total of 23 karst features were visually identified within or in the vicinity of the Project, including 16 depressions (shallow and deep), 3 open voids, 1 collapse, 1 surface opening, 1 spring, and 1 cave. (EA at 3-45). Further, the EA states that information provided by MoDOT in December 2016 indicated four to six known caves within 0.5 miles of the Study Corridor. (EA at 3-45). The EA expressly recognizes that "[s]ome karst features, such as caves and mines, can be used by Indiana and northern long-eared bats for hibernation and by gray bats



Adam Humphrey
April 21, 2017
Page 16

throughout the year. Ozark cavefish are also known to inhabit caves, streams, and springs in Greene County.”

To assess potential impacts to these endangered species and their identified habitat, the EA relies primarily on an acoustic survey conducted in August 2015 within a portion of the corridor along Workman Branch near South Kansas Avenue (Armstrong and Robbins, 2015), which detected the presence of the gray and northern long-eared bat, and additional bat habitat assessments conducted by Greene County in 2015 which identified suitable summer roosting and foraging habitat for both the Indiana bat and the northern long-eared bat within the Study Area. (EA at 3-44). However, both of these studies are limited in approach, season, scope, and extent, and by themselves do not adequately assess all potential impacts to the identified endangered species in the Study Area.

In particular, neither of these studies directly evaluated the numerous features identified in the Study Area nor investigated the broad Study Area for additional features and habitat. As a result, the Cooperating Agencies have not conducted, and the EA does not contain, adequate comprehensive, detailed, on-the-ground investigations or assessments of the identified features, potential habitat, or the potential impacts to endangered species. Instead, the EA merely proposes that “[the geotechnical survey done in January 2016] and future geotechnical and other investigations within the Study Corridor necessary for final design and construction will be used to identify karst features. Known caves in proximity to the Study Corridor (0.5 mile) that could be indirectly disturbed or affected by construction activity, as well as potentially suitable karst features identified within the Study Corridor, will be investigated for the presence of protected bats.” (EA at 3-44).

Further, regarding one known cave feature, the EA provides that “[t]he one cave feature identified in the PPI geologic investigation (Appendix G; KE21) coincides with a known cave in the MSS database (MSS, 2016). The entrance to this cave is outside and adjacent to the Study Corridor near the proposed crossing of Ward Branch. MSS conducted an investigation of this cave in February 2016. It has a mapped passage that extends approximately 140 feet and crosses under the proposed alignment. There is a stream flowing at the far end of the passage and there were no signs of winter bat use by any common or protected bat species or cavefish at the time of the investigation.” Rather than the Cooperating Agencies conducting full, detailed, on-the-ground study or assessment and providing the results in the EA, the EA concludes, “[a] follow-up survey in the summer to determine any use by northern long-eared bats, gray bats, or Ozark cavefish is warranted.” (EA at 3-45).

Until these additional, proposed, warranted investigations and studies are completed, neither the Cooperating Agencies nor the public can adequately understand the potential impacts of the Project on biological resources and threatened and endangered species, and the EA is both incomplete and inadequate.



Adam Humphrey
April 21, 2017
Page 17

Yet another example of the EA's incompleteness and inadequacy is evident in the following passage:

This project is expected to avoid direct adverse impacts to caves which could be used by protected bat species. **During future geotechnical and subsequent investigations necessary for final design and construction**, any karst features identified as possible cave habitat in or near the Project will be investigated for the potential use by any protected bat species or cavefish. Known caves within 0.5 miles of the Study Corridor that could provide habitat for protected bats or Ozark cavefish that could be indirectly disturbed or affected by construction activity will also be investigated.

(EA at 3-46) (emphasis added).

The Cooperating Agencies' failure to conduct reasonable, necessary, and identified investigations and studies, and their absence from the EA evident in this Section 3.9, Biological Resources and Threatened and Endangered Species, further limits the EA's adequacy in a number of other assessments as well. For example, because the Cooperating Agencies have not investigated and the EA does not assess the identified karst features, the Cooperating Agencies and the EA are unable to fully assess potential impacts to water resources (Section 3.7) or aquatic resources (Section 3.8) that may have a direct connection to such geologic structures. For example, without knowing the location, extent, and potential interconnectedness of the karst features as well as their relationship with surface and ground water in the Study Area, neither the Cooperating Agencies nor the public can adequately assess the potential impacts associated with stormwater runoff, pollutants, or construction debris entering these features.

Finally, the Homeowners are concerned the EA likely cannot withstand scrutiny under NEPA or the ESA insofar as it proposes to delay a number of the analyses of reasonably foreseeable direct and indirect impacts of the Project, including analyses of impacts to Biological Resources and Threatened and Endangered Species, until after a later date such as Project design or construction phases. Although the Cooperating Agencies' assurances of future additional assessment and study may possess a certain pragmatic appeal to the Cooperating Agencies, such assurances cannot obviate the need for compliance with NEPA regulations. Further, until such assessments and studies are completed, neither the Cooperating Agencies nor the public can adequately assess compliance with the ESA or NEPA.

The Cooperating Agencies should perform comprehensive, on-the-ground investigations of the Study Area, including investigations of known and unknown geologic structures, in order to fully assess potential impacts to biological resources and threatened and endangered species, as well as a number of other interconnected and related resources.

Adam Humphrey
April 21, 2017
Page 18

3.10 Farmland

The Homeowners do not have any comments on the EA's findings regarding farmland at this time. The Homeowners reserve the ability to and may comment on the EA in relation to potential impacts of the Project on farmland at a later date.

3.11 Geology and Soils

The EA's assessment of potential impacts to geology and soils is inadequate, incomplete, and insufficient to meet the requirements of NEPA.

The EA concludes that "[t]he Build Alternative could result in potential impacts and hazards associated with geology and soils." (EA at 3-56). Among the identified potential impacts and hazards are the disturbance of soils and bedrock; soil erosion; and that sediment, surface water/construction fluids, and road runoff could be introduced to the Springfield Plateau aquifer. (EA at 3-56).

Further, the EA identifies a number of potential impacts and hazards associated with sinkholes and other karst features as follows:

[S]inkholes and other karst features (e.g., vanishing streams) may act as a direct conduit for surface water to enter groundwater. [. . .]

Modifications of the hydrology of the Springfield Plateau aquifer could result in potential impacts. Karst aquifers, particularly when cavernous, are sensitive to changes in overland flow that may cut off recharge to the aquifer through a losing stream or sinkhole. This has potential to alter spring, river, or cave ecology by modifying the existing habitats.

Due to the numerous identified karst features within the Study Area, other unidentified karst features may be encountered during construction of the Project. Portions of the road and ROW that are placed on top of karst features could result in structural instability.

Sinkholes and subsurface soil domes have potential to pose geologic hazards to any structure placed on or immediately adjacent to these features.

(EA at 3-56).

However, in response to these recognized potential impacts and hazards, the EA merely proposes further investigation and study at a later date:



Adam Humphrey
April 21, 2017
Page 19

As a result, these features must be properly identified and accounted for during the design phase and managed throughout construction and grading activities.

The presence of sinkholes and soil voids should be determined during geotechnical investigation and taken into account during the design and grading phase.

To mitigate potential impacts and hazards, karst features should be further identified and investigated. Karst features should be taken into account during the Project design phase, and a karst mitigation plan should be developed prior to construction activities.

(EA at 3-56).

It is inappropriate and inadequate pursuant to the requirements of NEPA for the EA to identify potential impacts and hazards but fail to investigate or analyze them. The Cooperating Agencies should perform the additional investigations and analyses of the geologic structures and soils in the Study Area in order to allow the Cooperating Agencies and the public to adequately assess the Project's potential impacts not only to geology and soils, but also to a number of other interconnected and related resources.

3.12 Hazardous Waste

The Homeowners do not have any comments on the EA's finding regarding hazardous waste at this time. The Homeowners reserve the ability to and may comment on the EA in relation to potential hazardous waste impacts of the Project at a later date.

3.13 Architectural, Archaeological, Cultural, and Historic Resources

The EA's assessment of Architectural, Archaeological, Cultural, and Historic Resources is incomplete and inadequate because, as stated in the EA, "due to property access issues, the archaeological survey and any related site evaluation or mitigation will be completed at a later date but prior to project construction." (EA at 3-57).

The EA further acknowledges:

The Build Alternative has the potential to impact as yet unidentified historic properties. Compliance with Section 106 is being conducted under the PA for the phased Identification and Evaluation of Historic Properties (July 2014) among FHWA, MHTC, ACHP, and MoSHPO. Additionally, impacts to archaeological resources will be considered as property access and Project design are finalized. Construction



Adam Humphrey

April 21, 2017

Page 20

authorization for the Project cannot be issued until all of the applicable stipulations of the PA for Phased Section 106 evaluations have been satisfied.

(EA at 3-67).

It is inappropriate and inadequate pursuant to the requirements of NEPA to complete an EA, select a Preferred Alternative, and/or proceed with the Project without more fully ascertaining the potential impacts of the Project. Until the Cooperating Agencies actually complete a full assessment, neither the Cooperating Agencies nor the public can adequately understand the potential impacts of the Project. An assessment of the Project's potential impacts to the Architectural, Archaeological, Cultural, and Historic Resources should be pursued to completion.

3.15 Visual Resources

The EA mischaracterizes the Study Area and the scope of the Project and as a result does not adequately assess the potential impacts to visual resources in the Study Area. For example, the EA opines that "[t]he visual landscape is typical of a high density suburban area." (EA at 3-68). This characterization of the Study Area, and in particular that portion of the Study Area where the proposed Project would be constructed, mischaracterizes the existing undeveloped, wooded open space.

The EA recognizes that "[o]pen landscape, dominated by open fields and wooded areas, would be replaced by paved travel lanes and associated signage and traffic signals." (EA at 3-69). But the EA downplays the significance of the impacts to the area, stating, "[h]owever, the Study Corridor is wider than required for the travel lanes, and initially only two lanes would be constructed. Wooded areas outside the developed ROW could remain to provide a visual barrier between adjacent residences and the Project." (EA at 3-69).

The EA disregards the potential impacts of the Project on the visual resources of the Study Area by mischaracterizing the Study Area and the magnitude of the Project. If completed as proposed, the Preferred Alternative will destroy approximately 45 acres of undeveloped, wooded open space and replace it with a paved four lane roadway. The roadway, its associated signage, traffic signals, lighting, and the countless vehicles utilizing it would drastically alter the visual resources of the Study Area adversely impacting the human environment and dramatically altering the character of the community. The EA should fully and correctly identify these potential direct impacts.

3.16 Construction Impacts

The EA's assessment of construction impacts is inadequate and incomplete because it fails to assess construction impacts over the full duration of the proposed Project.



Adam Humphrey
April 21, 2017
Page 21

This section of the EA provides discussion regarding potential impacts of Project construction activities related to Traffic Control/Detours, Air Quality, Noise, Protected Habitat, Water Quality, Impacts to Floodplains/Floodways, Visual Effects, Utilities, and Borrow and Waste Sites. In sum, the EA concludes that the Project and the Preferred Alternative “would result in short-term and temporary impacts due to construction activities . . . [including] increases in noise, dust, and pollutants discharged by construction equipment . . . [and] temporary disruptions to businesses, residences, and existing traffic patterns with the development of possible travel detours and access modifications.” (EA at 3-69).

As proposed, the Project contemplates the initial construction of two travel lanes that would ultimately be built out into a full four lane facility in 15 to 20 years (EA at 2-9). As proposed, the Project is not a discrete construction project; it is a multi-decade, phased, and escalating construction project that would impact each portion of the proposed alignment repeatedly year over year from the time the first trees are to be removed, during construction of the first two lanes, and for 20 years later when additional lanes are to be constructed and the Project is fully completed. In other words, the Project contemplates two decades of continual construction activities.

On the whole, the impacts of the proposed construction activities are neither temporary nor inconsequential. Further, because the proposed construction activities will take place over a period of 20 years or more, even minimal impacts—such as impacts to air quality, water quality, and protected habitat—should be assessed over the span of the proposed Project construction timeline. The potential impacts in this regard merit further analysis and explanation.

3.17 Indirect and Cumulative Impacts

The EA’s indirect and cumulative impacts analyses are inadequate for a number of reasons.

The EA suggests that the Project would be consistent with comprehensive traffic plans for the area and would generally result in positive economic impacts. This conclusion is ostensibly built on the following premises: (1) “additional phases of residential development would attract additional businesses to the area;” (2) “economic development follows substantial transportation and access improvements;” and (3) “[t]he Project would introduce a new roadway into the region and provide access to areas that are currently inaccessible.” (EA at 3-74).

The EA proffers no support for these premises. In addition, the notion that the Project will provide access to areas that are currently inaccessible is patently inaccurate. As stated clearly elsewhere in the EA, “[a]ccess [to the new roadway] would be limited to the existing cross-streets, each with an at-grade signalized intersection.” (EA at 2-9). Further, contrary to the idea of increasing access to inaccessible areas, the actual intended effect of the proposed Project is to move as many vehicles as



Adam Humphrey
April 21, 2017
Page 22

quickly as possible through what is currently undeveloped, wooded open space. The indirect impacts of the Project will be to greatly alter the current character of the Study Area.

Regarding cumulative impacts, the EA recognizes that “[t]he construction of the new roadway would contribute to the cumulative loss of riparian and woodland habitat.” But the EA concludes, “[o]verall, no substantial cumulative effects are anticipated as a result of implementation of the Project, other than the positive cumulative effects on regional traffic circulation and safety.” This analysis is inadequate and insufficient in both breadth and depth. As discussed above, the EA fails to recognize the cumulative impact of the incremental impacts over the course of the proposed lengthy phased construction period.

Further, both the indirect and cumulative impacts analyses are inadequate because they fail to assess Project impacts associated with east-west travel along Weaver Road and Plainview Road, and problems associated with increased traffic on Cox Road beyond the southern terminus of the Project. As described above and in the EA, the effect of the proposed Project will be to draw substantial traffic from Cox Road, Campbell Avenue, and elsewhere to the new roadway. (EA at 2-4). However, the Project does not contemplate any improvements or enhancements to either Weaver Road and Plainview Road, the major identified east-west connections between the Project and Campbell Avenue. In addition, the Project terminates on its southern end by reconnecting with Cox Road; but the Project does not contemplate any improvements or enhancements to Cox Road at or beyond this southern terminus. As a result, the Project would undoubtedly burden the east-west connectors of Weaver or Plainview Roads, and Cox Road beyond the southern terminus, exacerbating problems on roadways identified in the EA as already at or beyond capacity. By failing to either assess or contemplate mitigating actions to alleviate these adverse impacts, the EA fails to provide adequate indirect and cumulative impacts analyses.

Further, the defined Study Area, depicted in Figure 1-2, does not include the entirety of Weaver Road or Plainview Road between the Project and Campbell Avenue, and does not include a meaningful portion of connecting roads beyond the southern terminus of the Project. As result, the EA fails to adequately assess the potential direct, indirect, and cumulative impacts to these surrounding roadways. To adequately analyze the indirect and cumulative impacts of the proposed Project, the Study Area should be expanded beyond Campbell Avenue on the east and further south beyond the Project’s southern terminus.

4.1 Commitments

A number of the proposed commitments described in Section 4.1 of the EA serve to highlight the incompleteness and inadequacy of the EA as further detailed above.

Adam Humphrey
April 21, 2017
Page 23

For example, the EA proposes to commit Greene County to the construction of two noise barriers to mitigate noise impacts, but the EA ignores entirely the potential impacts to two other residential areas. (EA at 4-1).

Further, the EA recognizes in a number of commitments related to water resources, sinkholes, and karst features, that substantial amounts of information are lacking and significant additional study is necessary, as follows:

Sediment, surface water/construction fluids, and road runoff could be introduced to the Springfield Plateau aquifer. Sinkholes and other karst features (e.g., vanishing streams) may act as a direct conduit for surface water to enter groundwater. As a result, these features will be properly identified and accounted for by Greene County and its engineer during the design phase and managed by the contractor throughout construction and grading activities.

The presence of sinkholes and soil voids will be determined by Greene County and its engineer during geotechnical investigation and taken into account during the design and grading phase.

Greene County will require its contractor to use BMPs during construction in areas where karst features have been identified that will include:

- Conducting a geologic subsurface evaluation of the Study Corridor using exploratory borings, electrical resistivity, seismic, or ground penetrating radar
- Contacting geotechnical specialists if new karst features are found during construction

During future geotechnical and other investigations necessary for final design and construction, any karst features identified will be investigated by Greene County and a qualified biologist for the presence or potential use by protected bat species. Known caves in proximity to the Study Corridor (0.5 mile) that could be indirectly disturbed or affected by construction activity, as well as potentially suitable karst features identified within the Study Corridor, will be investigated by Greene County and a qualified biologist for the presence of protected bats. This investigation and corresponding consultation with USFWS (based on the results of the investigation) will be completed and any mitigation measures resulting from that consultation will be incorporated into the project prior to receiving a federal construction authorization for the project.

(EA at 4-2, 4-3).

Adam Humphrey
April 21, 2017
Page 24

Much of the information that the EA admittedly lacks, and which the EA proposes be gathered at a later date, could have been easily and readily obtained by the Cooperating Agencies prior to the completion of this EA. But the information was not gathered and the proposed studies were not completed. As a result, the EA's analysis of the potential environmental impacts is inadequate and the mitigating commitments are ill-informed.

The Cooperating Agencies need to conduct and complete further investigations, study, and analyses of all reasonably foreseeable direct and indirect impacts of the Project and present their findings before an adequate comprehensive list of commitments can be properly prepared.

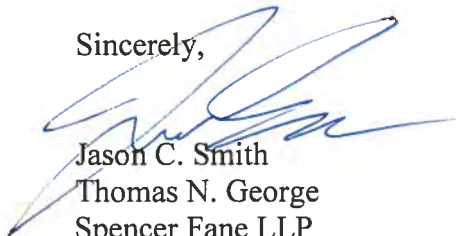
III. Conclusion

For the reasons further explained herein, the Homeowners are concerned that the EA is unfairly biased toward the Preferred Alternative, incomplete in its analysis of potential (and potentially significant) impacts, and insufficient to meet the requirements of NEPA and the ESA.

The Homeowners appreciate the opportunity to review the EA and provide the comments detailed herein. The Homeowners do not have any further comments at this time, but reserve the right to provide additional comments, as appropriate.

Thank you for your time and careful consideration of our comments and concerns regarding the EA and the Project.

Sincerely,


Jason C. Smith
Thomas N. George
Spencer Fane LLP
Attorneys for Homeowners

cc: Brent Brown
Doug Pitt
Justin French
Michael Sutton

APPENDIX E - AGENCY COMMENTS

Samuelson, Kathryn A (Kate)

From: Adam Humphrey <AHumphrey@greenecountymo.gov>
Sent: Tuesday, March 07, 2017 1:02 PM
To: Gieryn, Samuel W
Cc: Mohr, Paul F
Subject: RE: Kansas Expressway Extension Project - Environmental Assessment

Follow Up Flag: Follow up
Flag Status: Flagged

Mr. Gieryn,

I wanted to confirm that I've received your email response below. Thank you for reviewing and responding to our project notification for the proposed Kansas Extension Project. I'll pass your comments along to the rest of our project team.

Sincerely,

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

From: Gieryn, Samuel W [mailto:Samuel.W.Gieryn@hud.gov]
Sent: Tuesday, March 07, 2017 10:06 AM
To: Adam Humphrey <AHumphrey@greenecountymo.gov>
Cc: Mohr, Paul F <Paul.F.Mohr@hud.gov>
Subject: Kansas Expressway Extension Project - Environmental Assessment

Hello Mr. Humphrey,

Thank you for giving our agency the opportunity to review the proposed Kansas Expressway Extension Project and comment on its Environmental Assessment. I reviewed applicable HUD databases and did not identify any HUD-assisted projects in the EA's Study Area. Public housing developments and HUD-assisted residential new construction projects were specifically considered because of the potential negative impact if located near the extended highway project. Although not specific to HUD's mission, it is encouraging to see the incorporation of a proposed recreational trail into the proposed project to help improve the community.

At this time, we do not feel that participation by our agency at the public hearing is necessary. Thank you again for the opportunity to review and comment.

Best,

Sam

Samuel W. Gieryn, JD | Field Environmental Officer
U.S. Dept Housing & Urban Development | 400 State Avenue, Rm 200; Kansas City, KS 66101-2406
P: 913-948-5246 | F: 913-551-5859 | E: samuel.w.gieryn@hud.gov | <https://www.hudexchange.info/environmental-review/>



Missouri Department of

dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director



APR 05 2017

Mr. Adam Humphrey
Assistant Administrator
Greene County Highway Department
2065 N. Clifton
Springfield, MO 65803

Dear Mr. Humphrey:

The Missouri Department of Natural Resources appreciates the opportunity to review the materials for the proposed Kansas Expressway Extension Project. The department offers the following comments for consideration.

Project Location

The Environmental Assessment study area includes all area within 0.25 miles of each side of the Kansas Expressway Extension from the Kansas Expressway/Republic Road intersection to the Farm Road 190/S Farm Road 141 intersection. The following geographic descriptions apply to the endpoint locations of the proposed Kansas Expressway Extension within the study area.

Geographic Coordinates:

471627 E 4110272 N to 471132 E 4106606 N

Public Land Survey System:

Township 28 N, Range 22 W, Section 15
Township 28 N, Range 22 W, Section 14
Township 28 N, Range 22 W, Section 22
Township 28 N, Range 22 W, Section 23
Township 28 N, Range 22 W, Section 27

8-Digit Hydrologic Unit Code:

James (11010002)

Ecological Drainage Unit:

Ozark/White

Solid Waste

The department's technical bulletin, "Managing Construction and Demolition Waste" has been developed to assist project planners. This bulletin can be found on the department's web site at <http://dnr.mo.gov/pubs/pub2045.htm>.



Recycled paper

In the event construction work involves any excavation, the following technical bulletin might also be helpful, "Managing Solid Waste Encountered during Excavation Activities" as it provides general disposal requirements for any solid waste that may be discovered. The bulletin can be found on the department's web site at <http://dnr.mo.gov/pubs/pub2192.htm>.

In the event scrap tires are encountered, the following technical bulletin could also be helpful, "Management of Scrap Tires" as it provides guidance and disposal information for any scrap tires that may be discovered. The bulletin can be found on the department's web site at <http://dnr.mo.gov/pubs/pub2056.htm>.

Water Protection

Geospatial Data

Geospatial data published by the department addressing designated uses, sensitive waters, geology, and other watershed information included in this review, is available on the Missouri Spatial Data Information Service website at <http://msdis.missouri.edu/>. Additional geospatial resources available from the department can be found at <http://dnr.mo.gov/gis/>.

Permitting Obligations

Clean Water Act Sections 401 and 404:

Any project that has the potential to result in the discharge of fill or dredged material into a jurisdictional water of the United States may require Clean Water Act Section 404 Permit Authorization from the U.S. Army Corps of Engineers (USACE), and Section 401 Water Quality Certification from the Department of Natural Resources. The 401 Certification is a certification by the state that the project will not violate water quality standards. More information about the Section 404 Permit Program, including Clean Water Act jurisdiction, is available at <https://www.epa.gov/cwa-404/section-404-permit-program>. More information about state 401 Water Quality Certification can be found at <http://dnr.mo.gov/env/wpp/401/>.

If discharge into water has occurred, or will occur, Green County Highway Department or its contractors should immediately contact the USACE Little Rock District at (501) 324-5557, and the department's Operating Permits Section at (573) 522-4502 for more information. Green County Highway Department and its contractors may wish to consult with the department and the USACE prior to project initiation to ensure contingency plans are in place should such a discharge occur.

Mitigation

An alternatives analysis would need to be submitted prior to any impacts to jurisdictional waters as part of the avoidance and minimization measures that precede mitigating unavoidable impacts. Mitigation for wetlands should be in conformance with the *State of Missouri Aquatic Resources Mitigation Guidelines*, https://dnr.mo.gov/env/wpp/401/docs/mitigation_guidelines.pdf, while mitigation for streams should be in conformance with the *Missouri Stream Mitigation Method*, http://www.mvnm.usace.army.mil/Portals/51/docs/regulatory/May_2013_Missouri_Stream_Mitigation_Method.pdf.

Any mitigation plans must be in conformance with the *Compensatory Mitigation for Losses of Aquatic Resources*, <https://www.epa.gov/cwa-404/compensatory-mitigation>. This rule establishes a hierarchy for mitigation, with the purchase of credits from a mitigation bank at the top of that hierarchy. The rule also emphasizes in-kind and in-watershed mitigation; to go outside the watershed may result in a higher credit purchase calculation. The applicant should receive mitigation plan approval from the department prior to certification.

Land Disturbance

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

Information and application for online land disturbance permits are located at <http://www.dnr.mo.gov/env/wpp/epermit/help.htm>. Questions regarding permit requirements may be directed to the department's Southwest Regional Office at (417) 891-4300.

Best Management Practices (BMPs)

In all cases, BMPs should be utilized during project activities to limit the amount of sediment and other pollutants entering waters of the state, and to protect the water's chemical, physical, and biological characteristics. These practices include, but are not limited to, conducting work during low flow conditions whenever possible, keeping heavy equipment out of the water, and taking all necessary precautions to avoid the release of fuel or other waste products to streams and other waters. In addition, the department encourages the preservation of existing riparian or buffer areas around each water resource to limit the amount of sediments or other pollutants entering the water. Any stream banks, riparian corridors, lake shores, or wetlands denuded of vegetation should be stabilized and re-vegetated as soon as is practicable.

Designated Uses

Waterbodies with Specific Designated Uses:

Waterbodies are assigned specific designated uses according to State of Missouri Water Quality regulations at 10 CSR 20-7.031(2). These waters are protected by numeric water quality criteria outlined in 10 CSR 20-7.031(5) and Table A, as well as general water quality criteria outlined at 10 CSR 20-7.031(4).

The project area is contained within the Workman Branch (Waterbody ID (WBID) 3371), Ward Branch (WBID 2374), and James River (WBID 2362) watersheds, which eventually drain into Table Rock Lake (WBID 7313). Workman Branch, a Tributary to Workman Branch (WBID 3372), and a potentially impacted stream designated WBID 3960 are Class C streams, which are defined as streams that may cease flow in dry periods, but maintain permanent pools which support aquatic life. Ward Branch and James River are Class P streams, which are defined as

streams that maintain permanent flow even in drought periods. These streams are assigned the following specific designated uses in the Missouri Use Designation Dataset and at 10 CSR 20-7.031 Table H and specified in the following table:

- Protection and propagation of fish, shellfish and wildlife – warm water habitat (WWH)
- Cool Water Habitat (CLH)
- Human health protection (HHP)
- Irrigation (IRR)
- Livestock and wildlife protection (LWP)
- Secondary contact recreation (SCR)
- Whole body contact recreation – Category A (WBC-A)
- Whole body contact recreation – Category B (WBC-B)

Waterbody	WBID	Class	WWH	CLH	HHP	IRR	LWP	SCR	WBC-A	WBC-B
Trib. to Workman Branch	3372	C	X		X		X	X		X
Workman Branch	3371	C	X		X		X			X
	3960	C	X		X	X	X	X		X
Ward Branch	2374	P	X		X		X			X
James River	2362	P		X	X	X	X	X	X	

Waterbodies without Specific Designated Uses:

Waterbodies that are not assigned specific designated uses are still protected at all times by general water quality criteria outlined at 10 CSR 20-7.031(4), and are subject to the acute toxicity criteria of Tables A and B, as well as whole effluent toxicity conditions. There are two tributaries that could potentially be impacted by the proposed project that do not have specific designated uses.

According to the National Wetlands Inventory, there are eight ponds totaling about 1.5 acres, 1 acre of freshwater emergent wetlands, and 4 acres of forested/shrub wetland that could potentially be impacted by the proposed project. As such, the potential exists for wetlands, ponds, and the aforementioned tributaries and headwaters to be impacted, depending on their proximity to land disturbance activities. In all cases, take care to avoid such impacts through alternatives analysis before compensatory mitigation is considered. If wetlands, ponds, headwaters, or tributaries are not directly impacted but are near any land disturbance, take care to protect water quality. While these water bodies are not assigned specific designated uses, they are protected by Missouri's general water quality criteria.

Sensitive Waters

Table C, Waters Designated for Cold Water Habitat:

There are no known waters designated for Cold Water Habitat within the proposed project area. Missouri's waters designated for Cold Water Habitat can be found at 10 CSR 20-7.031 Table C, with associated criteria at 10 CSR 20-7.031 Table A.

Table D, Outstanding National Resource Waters:

There are no known Outstanding National Resource Waters within the proposed project area. There shall be no lowered water quality in Outstanding National Resource Waters, as designated in 10 CSR 20-7.031 Table D.

Table E, Outstanding State Resource Waters:

There are no known Outstanding State Resource Waters within the proposed project area. There shall be no lowered water quality in Outstanding State Resource Waters, as designated in 10 CSR 20-7.031 Table E.

Table F, Metropolitan No-Discharge Streams:

There are no known Metropolitan No-Discharge Streams within the proposed project area. Discharge to metropolitan no-discharge streams is prohibited, except as specifically permitted at 10 CSR 20-7.031(7). These exceptions include uncontaminated cooling water, permitted stormwater discharges in compliance with permit conditions, and excess wet-weather bypasses not interfering with designated uses.

Table I, Biocriteria Reference Locations:

There are no known biocriteria reference locations within the proposed project area. Biocriteria reference locations are water body segments used in the development of water quality standards and the assessment of aquatic life protection due to their high degree of biological integrity. Reference water locations for some aquatic habitat types can be found in 10 CSR 20-7.031 Table I. These waters should be protected in order to maintain their reference status.

Table J, Losing Streams:

There are no known losing streams within the proposed project area. A losing stream is defined as a stream that distributes 30 percent or more of its flow during low flow periods through permeable geologic material into a bedrock aquifer. These features are associated with karst topography, which underlies much of the state, and can act as conduits of pollutants to groundwater resources. Please contact the department's Missouri Geological Survey at (800) 361-4827 for more information or to determine if the project will cross or impact any losing streams. If losing streams are located in the project area, additional precautions and BMPs should be put in place to protect sensitive water resources at all times. Losing streams are protected by effluent regulations at 10 CSR 20-7.015(1)(B)3 and (4) and Water Quality Standards at 10 CSR 20-7.031(1)(N), (5)(C) and (13).

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

There are no known 303(d) Impaired or 305(b) Threatened Waters within the proposed project area. Waters assessed by the department as threatened or impaired could potentially be impacted by this project. Project personnel should ensure that any activities related to the project do not cause an increase in the pollutants impairing these waters nor re-suspend any pollutants that might be bound to sediment. Additional information can be found at <http://dnr.mo.gov/env/wpp/waterquality/303d/303d.htm>, or by contacting the department's Water Protection Program at (573) 751-1300.

Waters with Approved Total Maximum Daily Loads (TMDL):

Within the proposed project area, James River has an approved TMDL for nutrients. Approximately 233 TMDLs or TMDL alternatives have been approved by the U.S. Environmental Protection Agency for streams, rivers, and lakes throughout the state of Missouri. Care should be taken to ensure that the impairments are not made worse by this project's activities. The department staff may require extra protections when developing permits or certifications in order to comply with TMDL load and wasteload allocations. Additional information can be found at <http://www.dnr.mo.gov/env/wpp/tmdl/index.html>, or by contacting the department's Water Protection Program at (573) 751-1300.

Watershed Conditions

Karst Topography – Springs, Sinkholes, and Caves:

According to data, there are three springs, one sink hole, and a potential for caves to be affected by the proposed project. Springs, sinkholes, and caves are features on the landscape associated with karst topography that can act as direct conduits of surface water and pollutants to groundwater. As such, extra precaution should be taken to minimize disturbance of land in or around these features, and to avoid the introduction of pollutants to sensitive groundwater resources.

Certified Wells:

There are seven wells that could potentially be impacted by the proposed project, of which four are abandoned, and three are domestic water wells. Wells can also act as conduits of pollutants to groundwater resources. Abandoned wells should be plugged prior to any land disturbance, and care should be taken to utilize appropriate BMPs to protect any currently operating wells. For more information on locating and plugging wells, please visit the department's Wellhead Protection Section webpage at <https://dnr.mo.gov/geology/geosrv/wellhd/>, or contact the department's Geological Survey Program directly at (800) 361-4827.

Public Drinking Water:

All work associated with this project should take into consideration the protection of both surface and groundwater public drinking water supplies, implementing appropriate BMPs as necessary. In the event that public drinking water sources or infrastructure, such as reservoirs, water supply wells, surface water supply intakes, or treatment systems, have the potential to be impacted by

suspended solids or other pollutants as a result of this project, the owners or operators of the affected drinking water system should be notified prior to the onset of work. For additional information regarding source water protection, please contact Mr. Ken Tomlin of the department's Public Drinking Water Branch at (573) 526-0269.

Conservation Opportunity Areas (COAs):

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

Natural Areas:

There are no known designated Natural Areas in or near the proposed project area. Missouri Natural Areas are designated by the interagency Missouri Natural Areas Committee with the goal to protect and manage sites that represent the character, diversity and ecological processes of the state's native landscapes. Designated Natural Areas are located statewide and may consist of a combination of public and private resources. Please contact the Missouri Department of Conservation at (573) 751-4115, or the Department of Natural Resources at (800) 361-4827 for more information.

Geological Survey

The project area does not lie within a former mining district and there are no recorded mines within the project area. Therefore, there is no likely collapse potential due to former mining activities in the area. Also, there are no recorded geological structures identified near the project area.

Regional Geology and Hydrogeology

The sedimentary rock sequence in the Springfield Plateau area also contains limestone and shale units.

The document states, "Mississippian-age units, which crop out across southwestern Missouri, include the Cotter Formation, the Compton Formation, the Sedalia Formation, the Northview Formation, the Pierson Limestone, the Reeds Spring Formation, the Elsey Formation, and the Burlington-Keokuk Limestone." We would like to note that the Cotter Dolomite is Ordovician-age.

Build Alternative

The department agrees that due to numerous identified karst features within the study area, other unidentified karst features may be encountered during construction of the Project. Portions of the road and right of way that are placed on top of karst features could result in structural instabilities.

Mr. Adam Humphrey
Page Eight

We appreciate the opportunity to provide comments for the proposed action materials for the proposed Kansas Expressway Extension Project. If you have any questions or need clarification, please contact me or Ms. Missy Newman at (573) 751-3195. The address for correspondence is Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102. Thank you.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES



Robert D. Stout
Chief of Policy

RDS/man

Samuelson, Kathryn A (Kate)

From: Herleth, Michael
Sent: Monday, April 17, 2017 11:00 AM
To: Samuelson, Kathryn A (Kate)
Subject: FW: Kansas Expressway Extension Project/ Greene County, Missouri

Follow Up Flag: Follow up
Flag Status: Flagged

Please add to the files for the FONSI. thanks

From: Adam Humphrey [mailto:AHumphrey@greenecountymo.gov]
Sent: Monday, April 17, 2017 10:46 AM
To: DeBacker, Michael <mdebacker@burnsmcd.com>; Thornhill, Steve <sthornh@burnsmcd.com>; Herleth, Michael <mherleth@burnsmcd.com>; Beam, Steven R <srbeam@burnsmcd.com>; Doll, Maggie H <mhdoll@burnsmcd.com>
Cc: Jim Norgren <JNorgren@greenecountymo.gov>; Rick Artman <rartman@greenecountymo.gov>
Subject: FW: Kansas Expressway Extension Project/ Greene County, Missouri

Hello everyone,

I received the following response last week on behalf of the Delaware Nation regarding our Kansas Extension project. Just wanted to forward this along to each of you for your files/records. They have acknowledged their concurrence with our proposed project actions.

Thanks!

Adam Humphrey, P.E.
Assistant Administrator
Greene County Highway Department
(417) 829-6536

From: Kimberly Penrod [mailto:kpenrod@delawarenation.com]
Sent: Tuesday, April 11, 2017 11:13 AM
To: Adam Humphrey <AHumphrey@greenecountymo.gov>
Cc: Kimberly Penrod <kpenrod@delawarenation.com>
Subject: RE: Kansas Expressway Extension Project/ Greene County, Missouri

Adam,
Sorry this is late. Please update your files to reflect the contact information below.

The protection of our tribal cultural resources and tribal trust resources will take all of us working together. We look forward to working with you and your agency.
With the information you have submitted we can concur at present with this proposed plan.

As with any new project, we never know what may come to light until work begins.
The Delaware Nation asks that you keep us up to date on the progress of this project and if any discoveries arise please contact us immediately.

If you need anything additional from me please do not hesitate to contact me.

Thanks,
Kim

Respectfully,

*Kim Penrod
Delaware Nation
Director, Cultural Resources/
106, Archives, Library and Museum
31064 State Highway 281
PO Box 825
Anadarko, OK 73005
(405)-247-2448 Ext. 1403 Office
(405)-924-9485 Cell
kpenrod@delawarenation.com*



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Office of the Chief

Bill John Baker
Principal Chief
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S. Joe Crittenden
Deputy Principal Chief
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April 20, 2017

Adam Humphrey
Assistant Administrator
Greene County Highway Department
2065 N Clifton
Springfield, MO 65803

Re: Kansas Expressway Extension Project, Greene County, Missouri.

Mr. Humphrey:

The Cherokee Nation (CN) is in receipt of your correspondence about **Kansas Expressway Extension Project, Greene County, Missouri**, and appreciates the opportunity to provide comment upon this project. The CN maintains databases and records of cultural, historic, and pre-historic resources in this area. Our Historic Preservation Office has reviewed this project and cross referenced the project's legal description against our information and has found no instances where this project intersects or adjoins such resources. Thus, the CN does not foresee this project imparting impacts to Cherokee cultural resources at this time. However, if during the conduct of this project, items of cultural significance are discovered, the CN requests that the Greene County Highway Department halt all project activities immediately and re-contact our Offices for further consultation.

Additionally, we would request your Organization conduct appropriate inquiries with other pertinent Tribal and Historic Preservation Offices regarding historic and prehistoric resources not included in the CN databases or records. If you require additional information or have any questions, please contact me at your convenience.

Thank you for your time and attention to this matter.

Wado,

Elizabeth Toombs, Special Projects Officer
Cherokee Nation Tribal Historic Preservation Office
elizabeth-toombs@cherokee.org
918.453.5389