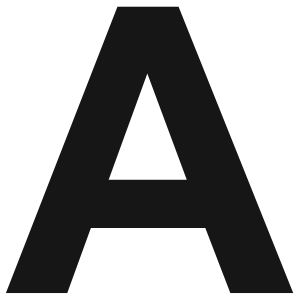
Kansas City International Airport
Environmental Assessment, Section 106 Evaluation, and
Section 4(f) Statement

Appendix A



Appendix A Public and Agency Coordination

This appendix contains the following:

Scoping

- Scoping Meeting Published Notices / Affidavits
- Example Agency Scoping Letter (Agency Scoping Letter Distribution List provided in Section A.2)
- Tribe Coordination Letters are provided in Appendix B
- Agency Scoping Meeting Sign-In Sheets
- Agency Scoping Meeting Agenda
- Meeting Presentation
- Agency Meeting Summary
- Public Scoping Letters (Public Scoping Letter Distribution List provided in Section A.3)
- Public Scoping Sign-In Sheets
- Public Scoping Display Boards
- Public Scoping Transcript
- Agency and Public Comments Received
- A DVD with interviews from the Public Scoping Meeting was also received. Due to the format, the DVD was entered in the Administrative File for the project.

Public Hearing

- Public Hearing Published Notices / Affidavits
- Public Hearing Sign-In Sheets
- Public Hearing Display Boards
- Agency and Public Comments Received (Found in Appendix H)

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A.1 Agency Scoping Letter Distribution List

The following key agencies as shown in **Table A-1** were invited to attend an Agency Scoping Meeting in Kansas City and to provide any information they wished to be considered in the EA. The letter provided later in this appendix addressed to Mr. Kyle Elliot, dated February 13, 2018, is an example of the coordination letter sent to all agencies.

Table A-1 Agency Scoping Letter Distribution List

Local	
City of Kansas City, Missouri Kyle Elliot Division Manager, Long Range Planning & Preservation 414 E. 12th St. Kansas City, MO, 64106	City of Kansas City, Missouri Mark L. McHenry Director 4600 E. 63rd St. Kansas City, MO, 64130
City of Kansas City, Missouri Troy Schulte City Manager 414 E. 12th St. Kansas City, MO, 64106	Mid-America Regional Council Tom Jacobs Environmental Program Director 600 Broadway, Suite 200 Kansas City, MO, 64105
Platte County Public Works Department Bob Heim Director 15955 Highway 273 Platte City, MO, 64079	City of Kansas City, Missouri Bradley Wolf City Historic Preservation Officer 414 E. 12th St. Kansas City, MO, 64106
State	
Missouri Department of Conservation Shannon Cave P.O. Box 180 Jefferson City, MO, 65102	Missouri SHPO Amanda Burke Historic Preservation Specialist P.O. Box 176 Jefferson City, MO, 65102
Missouri Department of Natural Resources Jennifer Hoggatt Water Resources Center Director P.O. Box 176 Jefferson City, MO, 65102	Missouri Department of Transportation Patrick K. McKenna Director 105 West Capitol Jefferson City, MO, 65102-0270
Missouri Federal Assistance Clearinghouse Commissioner's Office Office of Administration P.O. Box 809 State Capitol Building, Room 125 Jefferson City, MO, 65102	

Federal	
U.S. Fish and Wildlife Service Karen Herrington Field Supervisor 101 Park DeVille Drive, Suite A Columbia, MO, 65203-0057	U.S. Army Corps of Engineers Colonel Douglas B. Guttormsen Commander and District Engineer 600 Federal Building 601 E. 12th St Kansas City, MO, 64106
Federal Highway Administration Raegan Ball Program Development Team Leader 3220 W. Edgewood, Suite H Jefferson City, MO, 65109	U.S. Environmental Protection Agency Region 7 Jim Gulliford Regional Administrator 11201 Renner Blvd. Lenexa, KS, 66219
Federal Emergency Management Agency Paul Taylor Regional Administrator 11224 Holmes Rd Kansas City, MO, 64131	National Park Service, Midwest Region Cam Sholly Regional Director 601 Riverfront Drive Omaha, NE, 68102
Department of the Interior Courtney Hoover, Regional Environmental Officer Office of Environmental Policy and Compliance Denver Region P.O. Box 25007 (D-108) Denver Federal Center Denver, CO 80225-0007	Natural Resource Conservation Service Jason Saunders District Conservationist 1207 Branch Street Platte City, MO, 64079-1220

Copies of the letters to the following tribes are provided in Appendix B.

Tribes	
Iowa Tribe of Oklahoma Bobi Roush Cultural Preservation Department 335588 E. 750 Road Perkins, OK, 74059	Ponca Tribe of Nebraska Shannon Wright Tribal Historic Preservation Officer P.O. Box 288 Niobrara, NE, 68760
Miami Tribe of Oklahoma Diane Hunter Tribal Historic Preservation Officer P.O. Box 1326 Miami, OK, 74355	Yankton Sioux Tribe of South Dakota Kip Spotted Eagle Tribal Historic Preservation Officer P.O. Box 1153 Wagner, SD, 57380-1153
Omaha Tribe Tony Provost Tribal Historic Preservation Officer P.O. Box 368 Macy, NE, 68039	Osage Nation Andrea Hunter Director, Tribal Historic Preservation Officer 627 Grandview Pawhuska, OK, 74056
Kaw Nation Crystal Douglas Historic Preservation Officer P.O. Box 50 Kaw City, OK, 74641	

A.2 Public Scoping Letter Distribution List

In addition to the advertisement of the public notices, the following as shown in **Table A-2** were invited to attend the Public Scoping Meeting in Kansas City and to provide any information they wished to be considered in the EA and Section 106 evaluation.

Table A-2 Public Scoping Letter Distribution List

Public	
The Watkins Foundation Warren R. Watkins Jr. and Bruce R. Watkins Jr. P.O. Box 300584 Kansas City, MO 64130	Historic Kansas City Lisa Lassman Briscoe Executive Director 234 W. 10th Street Kansas City, MO 64105
Platte County Historical Society 220 Ferrel Street Platte City, MO 64079	Airline History Museum 201 NW Lou Holland Drive Kansas City, MO, 64116
TWA Museum 10 Richards Road #110 Kansas City, MO 64116	

A.3 Availability of the Draft EA, Section 106 Evaluation, and Draft Section 4(f) Statement

A Notice of Availability (NOA) announcing the availability of the Draft EA and Section 106 Evaluation and Public Hearing was published on August 23, 2018 in the Kansas City Star. A NOA announcing the availability of the Draft Section 4(f) Statement was published on September 10, 2018 in the Kansas City Star. Notice of the draft documents availability for review was sent to all stakeholders who submitted comments during the scoping process. The draft documents were also available to the public online at http://FLYKCI.com and at http://www.kci-edgemoor.com. Paper copies of the Draft EA and Section 106 Evaluation, and the Draft Section 4(f) Statement were available for public review at each of the following libraries identified in **Table A-3** during normal business hours.

Table A-3 Libraries

Libraries	
Mid-Continent Library Boardwalk Branch 8656 N. Ambassador Drive Kansas City, MO 64154	Mid-Continent Library Parkville Branch 8815 Tom Watson Parkway Parkville, MO 64152
Mid-Continent Library Platte City Branch 2702 Prairie View Road Platte City, MO 64079	

In addition, the draft documents were available for public review at the following locations identified in **Table A-4** during normal business hours.

Table A-4 Additional Location for Review

Additional Locations for Review	
Federal Aviation Administration Central Region Airports Division 901 Locust St., Room 364 Kansas City, MO 64106-2325	City of Kansas City, Aviation Department 601 Brasilia Ave. Kansas City, MO 64153

The comment period for the Draft EA and Section 106 Evaluation was open from August 23, 2018 to October 2, 2018. All comments received and the responses to the comments are found in **Appendix H**. The comment period for the Draft Section 4(f) Statement was open from September 10, 2018 to October 10, 2018. No comments were received on the Draft Section 4(f) Statement.

THE KANSAS CITY STAR.
MEDIA COMPANY
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The Kansas City Star | The Cass County Democrat
The Lee's Summit Journal | The Olathe Daily News

AFFIDAVIT OF PUBLICATION

Account #	Ad Number	Identification	PO	Amount	Cols	Lines
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Attention: GABRIELA ELIZONDO

LANDRUM & BROWN
11279 CORNELL PARK DR.
CINCINNATI, OH 45242

NOTICE OF OPPORTUNITY FOR A PUBLIC SCOPING MEETING MARCH 15, 2018. FOR THE ENVIRONMENTAL ASSESSMENT AND SECTION 106 REVIEW AT THE KANSAS CITY INTERNATIONAL AIRPORT

The City of Kansas City, Missouri Aviation Department is issuing this notice to advise the public that an EA and Section 106 Review will be prepared to assess the potential impacts of the Proposed Replacement Terminal Project at Kansas City International Airport.

The EA will be prepared in accordance with the procedures described in FAA Order 5050.4B, NEPA Implementing Instructions for Airport Actions, and FAA Order 1050.1F, Environmental Impacts: Policies and Procedures. The City of Kansas City, Missouri Aviation Department, the owner and operator of Kansas City International Airport, proposes the development of a replacement terminal and other associated projects. The proposed action includes the construction of a replacement terminal at the existing Terminal A site and decommissioning and demolition of the existing terminals. The proposed action also includes construction of a new parking garage and surface parking lot, construction of various stormwater collection system improvements, improvements to the existing Central Utility Plant, and resurfacing and rehabilitation of the taxiways near the replacement terminal. The EA will consider a range of alternatives that could potentially meet the purpose and need to increase passenger level of service and reduce operational costs and inefficiencies at Kansas City International Airport. The proposed action is anticipated to include an adverse effect on historic properties. The adverse effect is being mitigated through a Memorandum of Agreement (MOA) per Section 106 of the National Historic Preservation Act (NHPA).

To ensure all significant issues related to the proposed action are identified, one (1) public scoping meeting and one (1) governmental agency scoping meeting will be held. A governmental agency scoping meeting for all federal, state, and local regulatory agencies which have jurisdiction by law or have special expertise with respect to any potential environmental impacts associated with the proposed action will be held on Thursday, March 15, 2018. This meeting will take place at 2:00 p.m. The public scoping meeting will be held from 6:00 p.m. to 8:00 p.m. on Thursday, March 15, 2018. Both meetings will be held at the Ambassador Building, 12200 N. Ambassador Dr., Kansas City, Missouri.

The scoping process for this EA will include a comment period for interested agencies and interested persons to submit oral and/or written comments representing the concerns and issues they believe should be addressed. Please submit any written comments not later than 5:00 p.m. Central Daylight Time, Monday, April 16, 2018 to the following:

Chris Babb
Landrum & Brown
11279 Cornell Park Drive
Cincinnati, OH 45242
Or by email to KCIEAcomments@landrum-brown.com

For further information, contact: Mr. Scott Tener, P.E., Federal Aviation Administration, Central Region-Airports Division, ACE-600., Room 364, 901 Locust St., Kansas City, Missouri 64106-2325 Telephone: 816-329-2639.

LAURA TRICKLE
MY COMMISSION EXPIRES
8-17-2021
NOTARY SEAL
#17260653
JACKSON COUNTY
NOTARY PUBLIC, STATE OF MISSOURI

STATE OF MISSOURI)
) **ss.**
County of JACKSON)

I, Nancy Yeager,

make oath and swear that

CYPRESS MEDIA, LLC, publishers of The Kansas City Star, all it's neighborhood sections and suburban newspapers including 816, 913, Johnson County News, Northland and its subsidiaries, The Olathe News, The Cass County Democrat-Missourian and The Lee's Summit Journal, are published in the Kansas City, Missouri, metro (distribution) area including but not exclusively to Johnson and Wyandotte Counties in the state of Kansas, and Cass, Clay, Jackson and Platte Counties in the state of Missouri. Every publication listed is published weekly, twice weekly or daily. We confirm the notice ran the days scheduled in this statement. A true copy of which is hereto attached was duly published in The Kansas City Star.

FOR THE PERIOD OF: 1 day(s)

COMMENCING: **02/14/2018**

ENDING: **02/14/2018**

EDITION(S):
02/14/2018

Subscribed and sworn to before me, this 14th day of February in the year of 2018. I certify that I was duly qualified as a Notary Public for the State of Missouri, Commissioned in Jackson County, Missouri.

My commission expires September 17, 2021

Laura Trickle - Notary

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The Kansas City Star Company

1729 Grand Boulevard, Kansas City, Mo 64108

Affidavit of Publication

KC Star Publication Date 2/14/18

Name of Advertiser Landrum & Brown

Section of Appearance Main News

Page of Appearance 5A

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Signature Yolanda Smallwood (Kansas City Star Representative) Yolanda Smallwood-Sales Asst. Name & Title (Please print)

State of: MO

County of: Jackson

Sworn and Subscribed by Me.....

Date: 2 / 14 / 2018

Notary Public Seal

LAURA TRICKLE
MY COMMISSION EXPIRES
8-17-2021
NOTARY SEAL
#17260653
JACKSON COUNTY
NOTARY PUBLIC, STATE OF MISSOURI

(Notary Public Signature)

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THE KANSAS CITY STAR. | News | 5A

Body camera bills supported by families, opposed by police

BY RILEY ROAN AND HUNTER WOMACK
The Kansas City Star

TOPEKA

Two similar bills in the Kansas Legislature that would require police to release body camera footage to the public in cases of deadly or excessive force are facing pushback from police.

But family members of those shot by police testified at legislative hearings Tuesday that the measures would help grieving families as well as mend trust between law enforcement and communities.

Under current Kansas law, local police departments can decide whether they want to publicly release footage by citing discretionary exemptions in the open records law. Some never release the footage publicly, while others do so quickly.

Through tears, Molly White, the stepmother of Dominique White, pleaded with the House Judiciary committee members to "use your power so that other people will not experience this unnecessary unrest in their most desperate time."

"Nobody wants to watch a video of his or her child being shot and killed," she said. "Unfortunately the only way for us to get any answers would be for us to watch the video."

White, 30, was armed and fleeing from police when he was killed in September. The shooting sparked protesters to camp out for several days outside Topeka police headquarters and Black Lives Matter rallies. The district attorney is not filing charges against the officers.

White's father was not permitted to view police body camera footage of the shooting until nearly four months after his son's death.

"I kept thinking to myself, 'If the police officers weren't in the wrong, why not just show us? Seeing the body cam footage would've answered many of the questions we had," said Heather Joyce, White's sister-in-law.

"For 11 weeks, our family was denied answers and access to the body cameras worn by the police officers that morning."

In the Senate, conservative Republicans -- the majority of the Senate judiciary committee -- may keep one of the bills from advancing, despite its introduction by a fellow conservative, Sen. Molly Baumgardner, a Louisburg Republican.

"One of the most positive things, through research, as far as an outcome for having body cameras is that it increases transparency within our communities," Baumgardner said.

"And when we increase transparency in our communities, we increase trust."

The Senate bill would require police to publicly release the footage within 30 days of a request, while the House version would require public release within five business days of a request. Both would require disclosure within 24 hours to the subject of the video, their attorney, heirs or parents if they are under 18.

Several conservative Republicans on the committee said in interviews after the hearing they do not support the Senate bill in its current form.

Sen. Julia Lynn, an Olathe Republican, questioned whether the bill could cause further "unrest about police brutality and create a firestorm that socially we're so ripe for, right now."

The Johnson County sheriff's office and the Olathe chief of police, on behalf of the Kansas Association of Chiefs of Police, spoke against the bills. The Sedgwick County sheriff, Jeff Easter, also spoke against it.

Body cameras don't have the same perspective as the officers, said Greg Smith, a special deputy sheriff's liaison with the Johnson County Sheriff's Office.

"If you're looking for this to be some kind of panacea to fix police and community relations, this is not the bill," he said.

Olathe Police Chief Steven Menke said a body camera is a tool but "rarely tells the entire story."

"We cannot lose sight of the fact that police officers have the same due process rights as every other citizen," he said.

One concern by police was the time frame — within 24 hours — to disclose footage to the subjects of the video or their families.

"We don't have staff in the small departments. There are 435 law enforcement agencies; 70 percent have 10 or fewer officers," said Ramon Gonzalez, a retired Republican legislator and chief of police in Perry, a small town between Topeka and Lawrence, who spoke on behalf of the Kansas Peace Officers Association.

The House body camera bill, introduced by Rep. John Alcala, a Topeka Democrat, would also allow for departments to redact or obscure parts of the public video that include nudity or minors.

"We are at a pivotal point where real changes are needed to modernize transparency in Kansas," Alcala said.

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Notice of Opportunity for a Public Scoping Meeting For the Environmental Assessment (EA) and Section 106 Review at Kansas City International Airport

What: The City of Kansas City, Missouri Aviation Department will host a Public Scoping Meeting to discuss the type and scope of information and analysis to be included in a Draft EA for the Proposed Replacement Terminal Project at Kansas City International Airport. This project will study the environmental impacts of the development of a replacement terminal and other associated actions.

This is an opportunity for the public to provide input on what issues and information should be addressed in the EA. Comment sheets and a chance to give oral comments will be available at the meeting.

When and Where: The public scoping meeting will be held from 6:00 p.m. to 8:00 p.m. on Thursday, March 15, 2018.

The meeting will be held in the Ambassador Building located at 12200 N Ambassador Dr., Kansas City, Missouri.

Assistance: If you need assistance with language or accessibility, please contact J. Jade Liska, City of Kansas City, Missouri Aviation Department at (816) 243-3045.

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Cincinnati, OH 45242
USA
T +1 513 530 5333
F +1 513 530 1278
landrum-brown.com

February 13, 2018

Kyle Elliot
Division Manager, Long Range Planning & Preservation
City of Kansas City Missouri
414 E. 12th St.
Kansas City, MO, 64106

Re: Invitation for Agency Scoping Meeting March 15, 2018
Replacement Terminal Project Environmental Assessment
Kansas City International Airport

Dear Mr. Elliot,

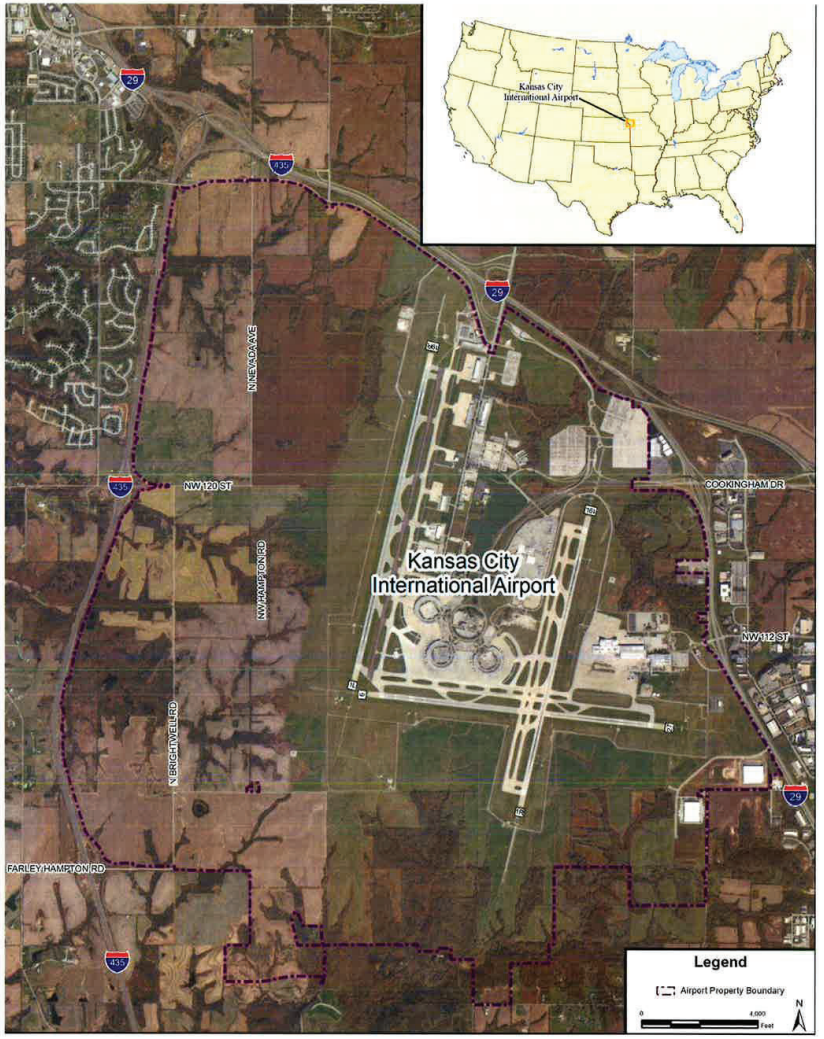
This letter is sent to inform you that the City of Kansas City, Missouri Aviation Department (KCAD) is preparing an Environmental Assessment (EA) for the Proposed Replacement Terminal Project (the Proposed Action) at the Kansas City International Airport (KCI). The location of the Airport is shown on **Exhibit 1**. The EA will investigate, analyze, and disclose any potential environmental impacts of the Proposed Action and its reasonable alternatives. The Federal Aviation Administration (FAA) is the lead Federal agency that will review the EA and as such the document will be prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures,* FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions,* and the FAA's Environmental Desk Reference for Airport Actions.

Your agency is invited to participate in an agency scoping meeting to be held March 15, 2018 at 2:00 p.m. at the Ambassador Building, 12200 N Ambassador Drive, Kansas City, Missouri. This agency scoping meeting is to identify potential issues associated with the Proposed Action and to determine if your agency has additional information on the human and natural environment of the proposed Project Site. Please respond to let us know if you will be attending in person. If you are unable to attend the scoping meeting, we can send out a link to join a web-based meeting. Written comments may be submitted not later than Monday, April 16th at 5:00 p.m. to the following address:

Landrum & Brown
Attn: Chris Babb
11279 Cornell Park Drive
Cincinnati, OH 45242

The purpose of the proposed replacement terminal project is to increase passenger level of service and reduce operational costs and inefficiencies. The overall goal of KCAD is to provide new, efficient, and technologically advanced airside, terminal, and landside facilities that increase passenger level of service.

Exhibit 1



The Proposed Action includes the following elements:

- Decommission and demolish existing Terminal A, including the Terminal A parking garage and aircraft apron, as conceptually shown on **Exhibit 2**,
- Decommission and demolish existing Terminal B and Terminal C and consolidate airline operations at the new replacement Terminal; (Terminal B and C would remain open during construction of the new terminal),
- Construct new terminal apron area around replacement terminal,
- Realign or relocate FAA facilities, including but not limited to the FAA compound wall, roadways leading to the FAA facility, FAA vehicle parking, duct banks, and cable loop,
- Construct new parking garage and a surface parking lot,
- Modify existing roadways and construct new roadways in the terminal area,
- Construct various storm water collection system improvements,
- Renovate existing Central Utility Plant (CUP) or construct replacement utility infrastructure,

The Project Site for the Proposed Action is within the existing terminal complex. The existing land uses with the Project Site are made up of developed land used for airport operations. For the purposes of the EA, areas that may be potentially disturbed are shown on **Exhibit 3.** The Proposed Action would physically alter portions of the Airport property. While all required environmental categories will be reviewed in the NEPA process, due to the location of the Project Site, the Proposed Action would not impact coastal resources, farmlands, or wild and scenic rivers. Although Best Management Practices would be adopted to minimize and reduce potential impacts, the following environmental categories have been identified where potential environmental impacts may occur.

Air Quality

KCI is located in Platte County, Missouri. The U.S. Environmental Protection Agency (USEPA) has designated Platte County attainment for all Federally-regulated pollutants referred to as criteria pollutants, which are carbon monoxide (CO), ozone (O_3), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), coarse particulate matter (PM_{10}), fine particulate matter, ($PM_{2.5}$) and lead (Pb).

The Proposed Action is not anticipated to cause an increase in aircraft operations or result in a change to fleet mix. However, the Proposed Action may cause a change in runway use by aircraft. In addition, the Proposed Action would cause emissions due to construction activity therefore an air quality assessment including a construction emissions inventory will be conducted to determine the impact, if any, upon local air quality.

Biological Resources

Biotic communities, including flora and fauna, impacted by the Proposed Action and the alternatives will be described and documented in the EA. The Project Site is currently used for aircraft operations and for the existing terminals. No known areas of critical wildlife habitat exist within the Project Site, therefore the potential for threatened and endangered species or habitat is unlikely.

Department of Transportation Act, Section 4(f)

Section 4(f) of the U.S. Department of Transportation (DOT) Act of 1966, as amended, provides protection for certain publicly-owned lands including parks, recreation areas, wildlife or waterfowl refuges, and any historic site listed or eligible for listing on the National Register of Historic Places. For this project, a Section 4(f) evaluation and determination will be required.

Exhibit 2



Hazardous Materials, Solid Waste, and Pollution Prevention

The potential for significant impacts from hazardous materials will be examined and documented in the EA. Asbestos is known to be within the existing Terminal buildings; however, mitigation measures for its proper demolition and removal would be disclosed in the EA.

Historical, Architectural, Archeological, and Cultural Resources

The potential for impacts to any Historic, Architectural, Archaeological, and Cultural Resources resulting from the Proposed Action will be examined and disclosed. The FAA has made a determination that the existing terminals are eligible for the National Register of Historic Places (NRHP). In accordance with the National Historic Preservation Act (NHPA), the FAA submitted that determination to the Missouri Department of Natural Resources, which serves as the State Historic Preservation Office (SHPO) for Missouri. The SHPO has concurred with the determination and the formal Section 106 process under the NHPA has been started. A Draft Memorandum of Agreement (MOA) is being created between KCAD, FAA, and the SHPO for mitigating adverse effects to historic properties from the Proposed Action.

Land Use

The Proposed Action will occur entirely on Airport-owned property and is not anticipated to affect land use compatibility.

Natural Resources and Energy Supply

The effects of each alternative on natural resources and energy supplies will be evaluated in the EA in terms of increased draw upon utilities, consumption of combustible fuels, and consumption of construction materials.

Noise and Noise-Compatible Land Use

As previously stated the Proposed Action is not anticipated to cause an increase in aircraft operations or result in a change to fleet mix. However, the Proposed Action may cause a change in runway use by aircraft. A noise analysis will be conducted using the Aviation Environmental Design Tool (AEDT) to determine and disclose potential impacts.

Socioeconomic Impacts, Environmental Justice, and Children's Environmental Health and Safety Risks

The potential for induced socioeconomic impacts, to the extent that they are influenced by the Proposed Action, will be assessed in the EA. The impact analysis will consider both beneficial as well as adverse induced economic impacts, changes in the economic structure of the area, and economic opportunities and potential displacements resulting from shifts in economic demand.

Visual Effects

The EA will include an evaluation to determine potential changes in the visual character of the area and the extent to which any lighting associated with the Proposed Action or alternatives will create an annoyance among people in the vicinity or interfere with their normal activities. However, due to the location of the site within the existing terminal core, the Proposed Action is not anticipated to affect light emissions.

Water Resources

The EA will include an evaluation to determine if the alternatives would cause potential impacts to water resources, including floodplains, groundwater, wetlands and streams, or surface waters. From previous studies conducted on the Airport there are no jurisdictional waters at the site of the Proposed Action. The area for the replacement terminal is already impervious surface.

If you have any questions concerning this matter, please contact me by phone at (513) 560-1242 or email at cbabb@landrum-brown.com.

Sincerely,

Chris Babb
Managing Consultant
Landrum & Brown, Incorporated

Exhibit 3



KANSAS CITY INTERNATIONAL AIRPORT

AGENCY SCOPING MEETING

March 15, 2018
2:00 P.M.
Ambassador Building

SIGN-IN SHEET

NAME (PLEASE PRINT)	AGENCY	EMAIL ADDRESS	PHONE NUMBER (INCLUDE AREA CODE)
Susan Barry	MoDOT	susan.barry@modot.mo.gov	816-607-2282
Gunnar Hand	SOM	gunnar.Hand@som.com	816.916.6304

KANSAS CITY INTERNATIONAL AIRPORT

AGENCY SCOPING MEETING

March 15, 2018
2:00 P.M.
Ambassador Building

SIGN-IN SHEET

NAME (PLEASE PRINT)	AGENCY	EMAIL ADDRESS	PHONE NUMBER (INCLUDE AREA CODE)
Rob Hunter	mo DNR	rob.hunter@dnr.mo.gov	573-522-2656
Kyle Elliott	KCMO Planning	kyle.elliott@kcmo.org	513.2802
Jason Farmer	U.S. Army Corps of Engineers-KC	farmer-0600@yahoo.com	(816) 389-3097
PAUL BLUE		PBLUE@PMGLP.COM	602-740-9217
JADE LISKA	KCAD	JADE.LISKA@KCMO.ORG	243.3045
DAN MOYLAN	EDGEMOOR	daniel.moylan@edgemoordevelopment.com	913-202-2675
[illegible]	PLATTE CO. PUBLIC WORKS	bhamm@co.platte.mo.us	816-858-2223
TODD MADISON	FAA AIRPORTS	todd.madison@faa.gov	816-329-2640
SCOTT TENER	FAA AIRPORTS ENV.	scott.tener@faa.gov	816-329-2639
Tom Jacobs	MARC	tjacobs@marc.org	816-701-8352

KANSAS CITY INTERNATIONAL AIRPORT

AGENCY SCOPING MEETING

March 15, 2018
2:00 P.M.
Ambassador Building

SIGN-IN SHEET

NAME (PLEASE PRINT)	AGENCY	EMAIL ADDRESS	PHONE NUMBER (INCLUDE AREA CODE)
Bob Heim	Platte Co. Public Works	bheim@co.platte.mo.us	816-858-2223

KANSAS CITY INTERNATIONAL AIRPORT

AGENCY SCOPING MEETING

March 15, 2018
2:00 P.M.
Ambassador Building

SIGN-IN SHEET

NAME (PLEASE PRINT)	AGENCY	EMAIL ADDRESS	PHONE NUMBER (INCLUDE AREA CODE)
Gannar Hack	SCM	Gannar.Hack@scm	816.916.6304

ENVIRONMENTAL ASSESSMENT

AT

KANSAS CITY INTERNATIONAL AIRPORT

AGENCY SCOPING MEETING

March 15, 2018
2:00 p.m.

AGENDA

Welcome..... *Rob Adams, Landrum & Brown*

I. Background and Purpose and Need

II. Proposed Action

III. Range of Alternatives

IV. EA Process

V. Assessing Environmental Impacts

VI. EA Schedule

VII. Opportunity to Comment on the EA

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Agenda

- Background and Purpose and Need
- Proposed Action
- Range of Alternatives
- EA Process
- Assessing Environmental Impacts
- EA Schedule
- Opportunity to Comment on the EA

Kansas City International Airport

Proposed Terminal Replacement Project Environmental Assessment

Scoping Meeting
March 15, 2018

Background and Purpose and Need

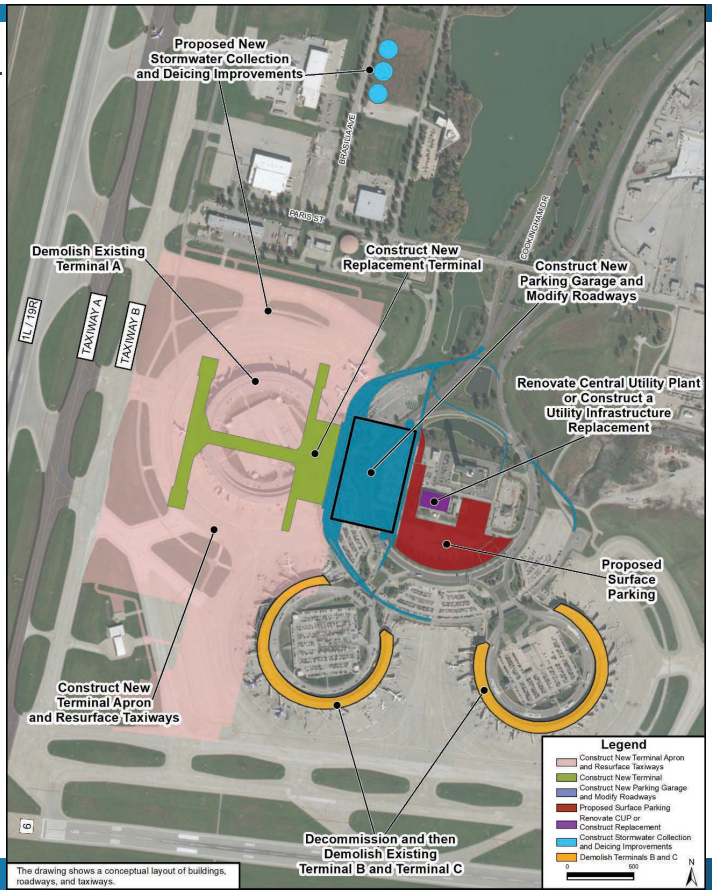
- There was extensive multi-year process reviewing need to renovate or replace terminals.
- On November 7, 2017 Kansas City voters approved with 75.3% of the vote the construction of a new passenger terminal and demolition of the existing terminals.
- Kansas City has identified the need to increase passenger level of service at the Airport.
- There is also a need to reduce operational costs and inefficiencies.



Proposed Action

- Decommission and demolish existing Terminal A, including the Terminal A parking garage and aircraft apron
- Construct new replacement terminal
- Construct new terminal apron area around replacement terminal
- Decommission and demolish existing Terminal B and Terminal C and consolidate airline operations at the new replacement Terminal
  - Terminal B and C will remain open during construction of new terminal

Proposed Action



Range of Alternatives for the EA

- No Action Alternative – Must be evaluated as a requirement of NEPA
- Use of the Existing Terminals
- Replacement Terminal on Airport Property

Proposed Action (*continued*)

- Construct new parking garage and a surface parking lot
- Modify existing roadways and construct new roadways in the terminal core area
- Construct various storm water collection system improvements
- Renovate existing Central Utility Plant (CUP) or construct replacement utility infrastructure
- Potentially resurface and rehabilitate the taxiways in the vicinity of the replacement terminal

What is an EA?

An Environmental Assessment is a concise document used to describe a proposed action's anticipated environmental impacts.

Federal Aviation Administration is lead federal agency therefore EA will be prepared according to FAA orders.

If it is found that *significant impacts* would NOT occur, then a Finding of No Significant Impact (FONSI) can be prepared.

If it is found that *significant impacts* WOULD occur, then an Environmental Impact Statement (EIS) must be prepared.

Why an Environmental Assessment?

NEPA stands for:

National Environmental Policy Act

NEPA requires:

All federal agencies to integrate environmental values into their decision making processes by considering the environmental impacts of their proposed actions and reasonable alternatives to those actions.

Department of Transportation/FAA are federal agencies and must comply with NEPA.

The Proposed Replacement Terminal Project is a Federal Action because it will require approval of an Airport Layout Plan and potential request for any Federal funding.

Environmental Resources to be assessed in the EA

- Air Quality
- Biological Resources
- Climate
- Department of Transportation, Section 4(f) Resources
- Hazardous Materials, Solid Waste, and Pollution Prevention
- Historical, Architectural, Archeological, and Cultural Resources
- Land Use
- Natural Resources and Energy Supply
- Noise and Noise-Compatible Land Use
- Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks
- Visual Effects
- Water Resources (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers)
- Cumulative Impacts

EA Process

- Role of the Regulatory Agencies
  - Help identify potentially significant environmental impacts
  - Review and comment on EA finding
  - Issue environmental permits where applicable
  - Review proposed mitigation strategies where applicable
  - Ensure compliance with local, State, and Federal environmental regulations

Affected Environment Categories Not Present

Due to the location of the Proposed Action the following resources would not be affected:

- Coastal Resources
- Farmlands
- Wild and Scenic Rivers

Area of Potential Ground Disturbance



Assessing Environmental Impacts

Biological Resources

Special status species and their habitats must be identified in order to determine if the Proposed Action would be likely to jeopardize the continued existence of the species in question or would disturb critical habitat in the affected area. The presence of special status species is unlikely because the area is currently used for airport operations.

2017 Special Status Species in Platte County			
Name	**State Status**	**Federal Status**	**Bald and Golden Eagle Protection Act**
Indiana bat (*Myotis sodalis*)		Endangered	
Pallid sturgeon (*Scaphirhynchus albus*)	Endangered	Endangered	
Bald eagles (*Haliaeetus leucocephalus*)			Protected
American Bittern (*Botaurus lentiginosus*)	Endangered		
Flathead Chub (*Platygobio gracilis*)	Endangered		
King Rail (*Rallus elegans*)	Endangered		
Lake sturgeon (*Acipenser fulvescens*)	Endangered		
Least tern (*Sterna antillarum*)		Endangered	
Northern long-eared bat (*Myotis septentrionalis*)		Threatened	
Piping plover (*Charadrius melodus*)		Threatened	
Rufa Red knot (*Calidris canutus rufa*)		Threatened	

Assessing Environmental Impacts

Air Quality

An air quality analysis will be conducted to determine if the total annual emissions (tons per year) of the Proposed Action, when compared to the No Action Alternative, would exceed the applicable *de minims* thresholds.

Noise and Noise-Compatible Land Use

The Proposed Action is not anticipated to change the number or type of aircraft operating at the Airport but may change runway use. A noise analysis will be conducted to determine potential impacts.

Socioeconomics

The EA will consider both beneficial and potential adverse induced economic impacts.

Assessing Environmental Impacts

Historic Resources

- The existing terminals have been determined to be eligible for listing on the National Register of Historic Places (NRHP). The FAA and the State Historic Preservation Office (SHPO) have agreed there would be potential adverse impacts to the terminals and the formal Section 106 process has been started.

- The project would include measures to minimize impacts to historic terminals.
  - Terminal B and C will remain open and untouched during construction, giving time to collect further information and create a permanent record of their existence.

Assessing Environmental Impacts

Land Use

The Proposed Action occurs entirely on Airport property so there would be no changes to zoning. The nearest residential area is located at least 10,000 feet south of the proposed action site. There are no schools, churches, or hospitals in the area of potential disturbance.

Natural Resources and Energy Supply

The EA will evaluate the potential impact to natural resources and energy supply. It is anticipated that by reducing redundant systems from the three terminals into one and incorporating more energy efficient systems the Proposed Action may have a beneficial impact.

Hazardous Materials and Solid waste

The potential for significant impacts from hazardous materials will be examined and documented in the EA.

Visual Effects

The EA will evaluate if the Proposed Action would significantly alter the visual character of the area or create a new annoyance from a lighting perspective.

Assessing Environmental Impacts

Historic Resources

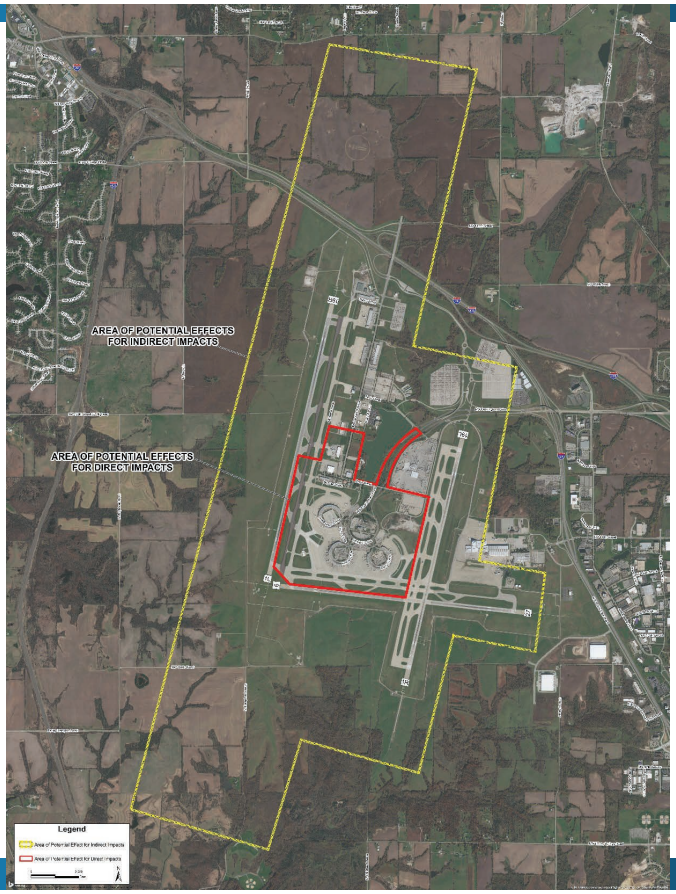
- Three archaeological sites have been identified in the Indirect APE (outside the area of potential ground disturbance).

Cemeteries/Burial Sites

- There are known cemeteries On and Off-Airport property. None of these sites will be will be directly impacted by the Proposed Action.
- KCAD and FAA have received information regarding prior landowners of current airport property and the potential for unmarked graves.
- Because no records were kept of specific burials or locations of burials, it is impossible to know where and how many burial sites may be present within the APE for the Proposed Action.
- Majority of the area for potential direct impacts has been previously disturbed.
- If previously unidentified cultural materials or human remains are encountered during construction, work shall cease immediately at that location, and the FAA, SHPO, and Tribal officer will be notified as soon as possible to determine the appropriate course of action.

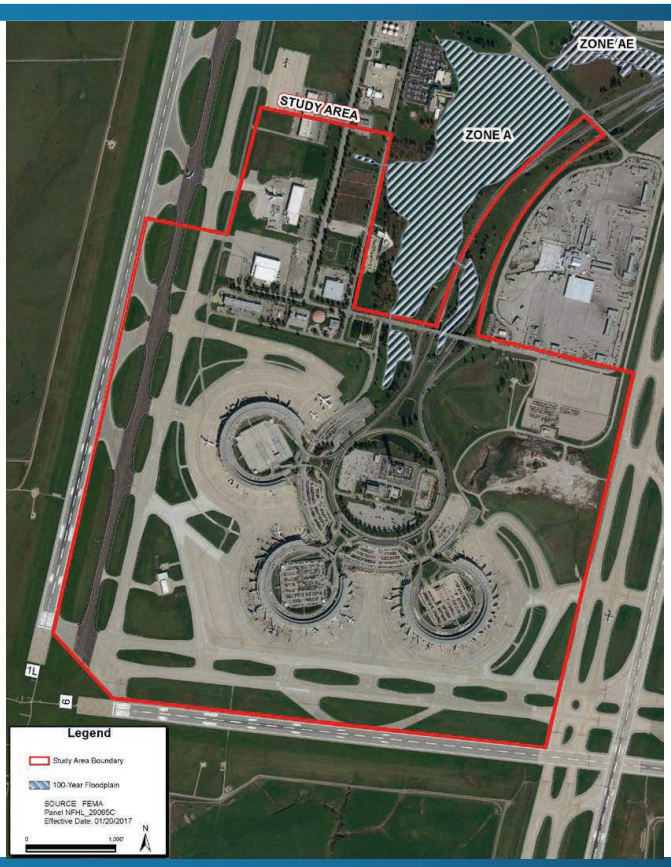
Historical, Architectural, Archeological, and Cultural Resources:

Areas of Potential Effects (APE) for Direct and Indirect Impacts



Water Resources: Floodplain

Known Floodplains in the Area of Potential Disturbance



Source: Updated Federal Emergency Management Agency (FEMA) Floodplain data

Water Resources : Wetlands

Known wetlands in the Area of Potential Disturbance



Source: Updated National Wetlands Inventory data

Opportunity to Comment

- Comment forms at the Public Scoping Meeting
- Oral comments taken at the Public Scoping Meeting
- Submit written comments by April 16, 2018 to:

  Landrum & Brown
  Attn: Chris Babb
  11279 Cornell Park Drive
  Cincinnati, OH 45242

- By Email KCIEAcomments@landrum-brown.com

EA Schedule

- Scoping – *March 15, 2018*
- Prepare EA analysis – *Spring 2018*
- Publish Draft EA for public review and hold Public Hearing – *Summer 2018*
- Final EA – *Fall 2018*
- FAA issues its finding – *Fall 2018*













ENVIRONMENTAL ASSESSMENT

AT

KANSAS CITY INTERNATIONAL AIRPORT

AGENCY SCOPING MEETING

March 15, 2018
2:00 p.m.

Summary:

- Rob Adams, Landrum & Brown (L&B), opened the agency scoping meeting and requested everyone in attendance identify themselves.
- L&B stated the purpose of the meeting was to gather information, help define the issues to be addressed in the EA, and identify any significant issues related to the proposed project.
- L&B proceeded to go through a PowerPoint presentation.
- After the presentation, the following questions are comments were made by the agencies in attendance.
    - Question from Rob Hunt, Missouri Department of Natural Resources (MO DNR) – How is L&B planning to identify underground storage tanks? MO DNR has published maps online that identify local USTs.
    - Response - L&B will make sure to utilize MO DNR's online resource.
    - Question from Tom Jacobs, MARC – The EA has the opportunity to not only identify, measure, and mitigate potential impacts, but also to go beyond and implement strategies that may result in environmental benefits (air quality, energy, water, transportation).
    - Response – Comment noted.
    - Question from Jason Farmer, USACE – What would be the main difference between the Baseline, No Action, and Future scenario?
    - Response – The Future No Action scenario is the same as the Baseline but we project future forecast of operations. No physical changes would occur with the Future No Action scenario.
- L&B concluded the presentation, requested comments on the scope of the EA be submitted by April 16, 2018, and thanked everyone for their participation.

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Cincinnati, OH 45242
USA
T +1 513 530 5333
F +1 513 530 1278
landrum-brown.com

February 23, 2018

The Watkins Foundation
Warren R. Watkins Jr. and Bruce R. Watkins Jr.
P.O. Box 300584
Kansas City, MO 64130

Re: Invitation for Public Scoping Meeting March 15, 2018
Replacement Terminal Project Environmental Assessment
Kansas City International Airport

Dear Sirs,

This letter is sent to inform you that the City of Kansas City, Missouri Aviation Department (KCAD) is preparing an Environmental Assessment (EA) for the Proposed Replacement Terminal Project (the Proposed Action) at the Kansas City International Airport (KCI). The EA will investigate, analyze, and disclose any potential environmental impacts of the Proposed Action and its reasonable alternatives. The Federal Aviation Administration (FAA) is the lead Federal agency that will review the EA and as such the document will be prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures,* FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions,* and the FAA's Environmental Desk Reference for Airport Actions.

You are invited to participate in a public scoping meeting to be held March 15, 2018 from 6:00 p.m. to 8:00 pm at the Ambassador Building, 12200 N Ambassador Drive, Kansas City, Missouri. This public scoping meeting is to identify potential issues associated with the Proposed Action and to determine if your organization has additional information on the human and natural environment of the proposed Project Site. If you are unable to attend, written comments may be submitted not later than Monday, April 16th at 5:00 p.m. to the following address:

Landrum & Brown
Attn: Chris Babb
11279 Cornell Park Drive
Cincinnati, OH 45242

Or by email to KCIEAcomments@landrum-brown.com.

If you have any questions concerning this matter or need special assistance with language or accessibility at the meeting, please contact me by phone at (513) 560-1242 or email at cbabb@landrum-brown.com.

Sincerely,

Chris Babb
Managing Consultant
Landrum & Brown, Incorporated

11279 Cornell Park Dr.
Cincinnati, OH 45242
USA
T +1 513 530 5333
F +1 513 530 1278
landrum-brown.com

February 23, 2018

TWA Museum
10 Richards Rd #110
Kansas City, MO 64116

Re: Invitation for Public Scoping Meeting March 15, 2018
Replacement Terminal Project Environmental Assessment
Kansas City International Airport

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Sincerely,

Chris Babb
Managing Consultant
Landrum & Brown, Incorporated

Global Aviation Planning and Development

11279 Cornell Park Dr.
Cincinnati, OH 45242
USA
T +1 513 530 5333
F +1 513 530 1278
landrum-brown.com

February 23, 2018

Airline History Museum
201 NW Lou Holland Drive
Kansas City, MO 64116

Re: Invitation for Public Scoping Meeting March 15, 2018
Replacement Terminal Project Environmental Assessment
Kansas City International Airport

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Sincerely,

Chris Babb
Managing Consultant
Landrum & Brown, Incorporated

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F +1 513 530 1278
landrum-brown.com

February 23, 2018

Platte County Historical Society
220 Ferrel Street
Platte City, MO 64079

Re: Invitation for Public Scoping Meeting March 15, 2018
Replacement Terminal Project Environmental Assessment
Kansas City International Airport

Dear Sir or Madam,

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Sincerely,

Chris Babb
Managing Consultant
Landrum & Brown, Incorporated

11279 Cornell Park Dr.
Cincinnati, OH 45242
USA
T +1 513 530 5333
F +1 513 530 1278
landrum-brown.com

February 23, 2018

Historic Kansas City
Lisa Lassman Briscoe
234 W. 10th Street
Kansas City, MO 64105

Re: Invitation for Public Scoping Meeting March 15, 2018
Replacement Terminal Project Environmental Assessment
Kansas City International Airport

Dear Ms. Lassman Briscoe,

This letter is sent to inform you that the City of Kansas City, Missouri Aviation Department (KCAD) is preparing an Environmental Assessment (EA) for the Proposed Replacement Terminal Project (the Proposed Action) at the Kansas City International Airport (KCI). The EA will investigate, analyze, and disclose any potential environmental impacts of the Proposed Action and its reasonable alternatives. The Federal Aviation Administration (FAA) is the lead Federal agency that will review the EA and as such the document will be prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures,* FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions,* and the FAA's Environmental Desk Reference for Airport Actions.

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Attn: Chris Babb
11279 Cornell Park Drive
Cincinnati, OH 45242

Or by email to KCIEAcomments@landrum-brown.com.

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Sincerely,

Chris Babb
Managing Consultant
Landrum & Brown, Incorporated

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KANSAS CITY INTERNATIONAL AIRPORT

PUBLIC SCOPING MEETING

March 15, 2018
6:00 P.M. to 8:00 P.M.
Ambassador Building

SIGN-IN FORM

NAME (PLEASE PRINT)	ADDRESS	PHONE NUMBER (INCLUDE AREA CODE)
Cora Thompson	1100 West 8th Parkville	816 982 9869
Alexis Albright	18011 NW Jade Ct, Ste 100 Kcmo 64152	816-349-7010
Daisy L. Young	12413 Newton Court Hardview KS	816-326-7117
Preston Young	12413 Newton Court Hardview KS	816-326-7117
Thomas M. Levin	26310 S. Hickory Trail Harrisonville	816-8960183
John Sulzer CHAPS	7331 Jarboe	816-342-6083
Tyler Hill	3303 East 108th Terrace	816-313-9908

KANSAS CITY INTERNATIONAL AIRPORT

PUBLIC SCOPING MEETING

March 15, 2018
6:00 P.M. to 8:00 P.M.
Ambassador Building

SIGN-IN FORM

NAME (PLEASE PRINT)	ADDRESS	PHONE NUMBER (INCLUDE AREA CODE)
Don Lueke	TWA Museum 10 Richards Rd	816 234 1011 or 816 6687753
Margo Farnsworth	13223 N. Virginia Ave	615-478-4889
Mike Dustman	4510 NE 91st Ter. Kcmo 64156	(816) 935-2929
Ann Raab	612 Edmond St 64098	816-377 3472
Mark Raab	" "	816 377-3473
Warren Watkins Jr		816 547 9905
Tunika Bonds	8829 NE 73rd Ter 64158	8162131315
Timberlyn Smith	6006 E. Harlan St Kcmo	816-333-2480
Dan Moylan	4607 Silverheel St. Shawnee KS	913-202-2675
Steve WOOD	10 Richards Rd TWA	816-225-1187

KANSAS CITY INTERNATIONAL AIRPORT

PUBLIC SCOPING MEETING

March 15, 2018
6:00 P.M. to 8:00 P.M.
Ambassador Building

SIGN-IN FORM

NAME (PLEASE PRINT)	ADDRESS	PHONE NUMBER (INCLUDE AREA CODE)
Rodney Thompson	3724 Locust #5	816-561-9877
Kerwin Looney	82-9417-82	816-728-2722
Carol Hunt	~~1901 Kenwood~~ 6114 S. National Dr	~~816~~ 248-978-5990
Geoff Stricker		703-622-0192
Brett Mathews		913 558 4617
Greg King	533 Mexico City Ave	913-226-2353
JEFF HUMENIK	6418 College Blvd. Overland Park, KS	913-626-6299
Terry Leeds	4800 E 63rd St KCMO	816 513 0203
Mark Griffin	4800 E. 63rd St. KCMO	816-513-0182

Page___of___

KANSAS CITY INTERNATIONAL AIRPORT

PUBLIC SCOPING MEETING

March 15, 2018
6:00 P.M. to 8:00 P.M.
Ambassador Building

SIGN-IN FORM

NAME (PLEASE PRINT)	ADDRESS	PHONE NUMBER (INCLUDE AREA CODE)
MIKE HUGHES	2419 BENTON	816-217-4834
Michael North	7427 TROOST Ave	816-444-4137
Bob Louden	KC, MO	314-267-6008
ERIC BOHANZ	1608 NW 65th RD KVILLE MO	816-564-8815
JAMES WALLS	3018E21st 64127	816-728-1361
BOB WILLIAMS	1100 NW 108th CT	303-910-1642
Mark Goodwin	14620 Farley St Overland Park KS	240-957-1392
Alcorama P. Spencer	1100 WEST ST PARKVILLE	816-982-9869

Page___of___

KANSAS CITY INTERNATIONAL AIRPORT

PUBLIC SCOPING MEETING

March 15, 2018
6:00 P.M. to 8:00 P.M.
Ambassador Building

SIGN-IN FORM

NAME (PLEASE PRINT)	ADDRESS	PHONE NUMBER (INCLUDE AREA CODE)
Grace Watkins McKinley	7129 Paseo	816-665-1890

Page___of___

KANSAS CITY INTERNATIONAL AIRPORT

PUBLIC SCOPING MEETING

March 15, 2018
6:00 P.M. to 8:00 P.M.
Ambassador Building

SIGN-IN FORM

NAME (PLEASE PRINT)	ADDRESS	PHONE NUMBER (INCLUDE AREA CODE)
Mike McNully	1417 Jackson Ave, K.C., Mo 64127	816-518-3276

Page___of___

Welcome to the Scoping Meeting for the Environmental Assessment and Section 106 Evaluation

Proposed Replacement Terminal Project

at Kansas City International Airport

What is an Environmental Assessment?

An Environmental Assessment (EA) is a concise document used to describe a proposed action's anticipated environmental impacts.

The National Environmental Policy Act of 1969 (NEPA) and FAA Orders 5050.4B/1050.1F require all major Federal actions (including FAA actions) to be environmentally reviewed.

An Environmental Assessment:

- Discloses impacts and identifies if there are any that would result from the implementation of the Proposed Action.
- Provides sufficient evidence and analysis for a Federal determination of whether to prepare an Environmental Impact Statement (EIS) or issue a Finding of No Significant Impact (FONSI).
- Requires coordination with local, state, and Federal regulatory agencies.

Environmental Impact Categories

- Air Quality
- Biological Resources
- Climate
- Coastal Resources
- Department of Transportation Act, Section 4(f)
- Farmlands
- Hazardous Materials, Solid Waste, and Pollution Prevention
- Historical, Architectural, Archeological, and Cultural Resources
- Land Use
- Natural Resources and Energy Supply
- Noise and Noise-Compatible Land Use
- Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks
- Visual Effects (including light emissions)
- Water Resources (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers)
- Cumulative Impacts

Source: FAA Order 1050.1F, Environmental Impacts: Policies and Procedures

Environmental Assessment Process

Proposed Action

- Decommission and demolish existing Terminal A, including the Terminal A parking garage and aircraft apron

- Construct new replacement terminal

- Decommission and demolish existing Terminal B and Terminal C and consolidate airline operations at the new replacement Terminal (Terminal B and C will remain open during construction of new terminal)

- Construct new terminal apron area around replacement terminal

- Construct new parking garage and a surface parking lot

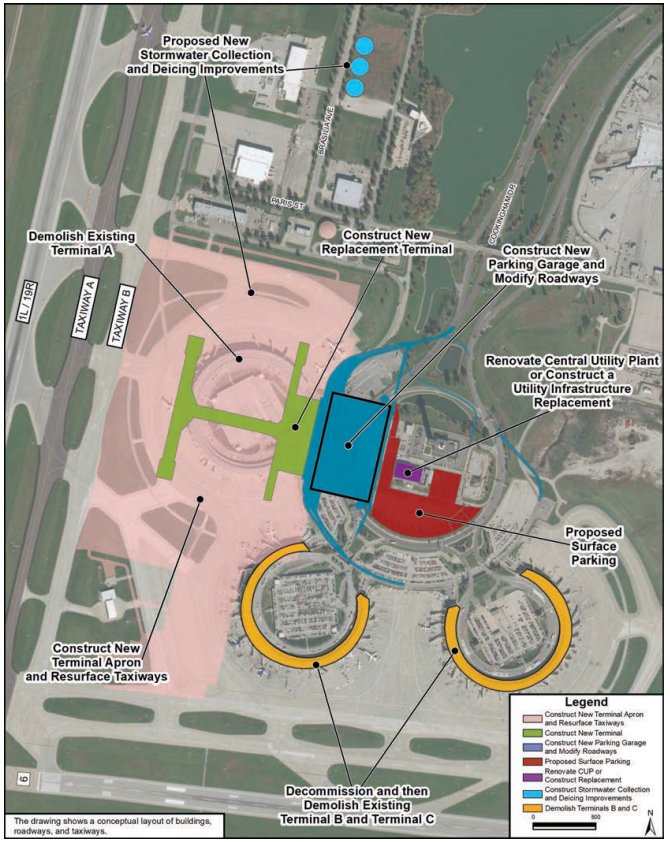
- Modify existing roadways and construct new roadways in the terminal core area

- Construct various storm water collection system improvements

- Renovate existing Central Utility Plant (CUP) or construct replacement utility infrastructure

- Potentially resurface and rehabilitate the taxiways in the vicinity of the replacement terminal

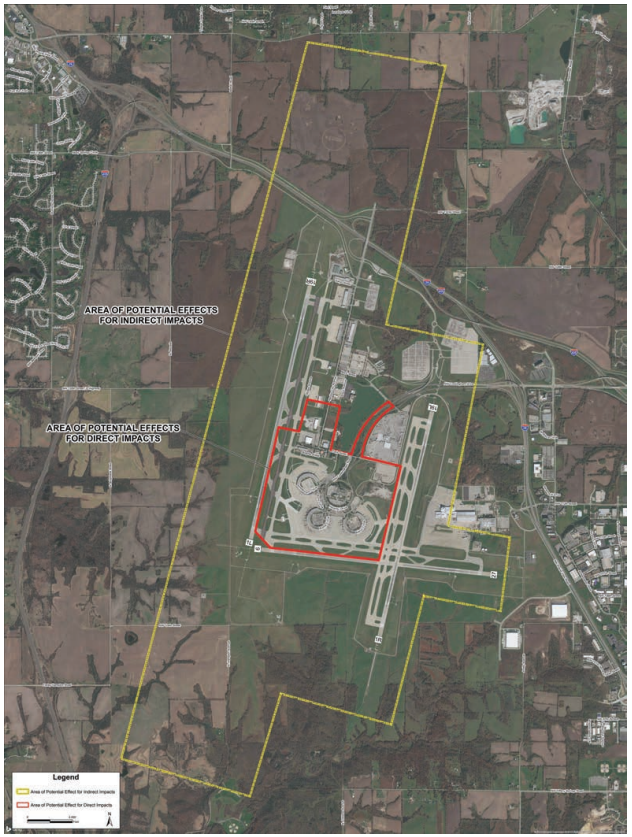
Proposed Action



Replacement Terminal Site Alternatives



Areas of Potential Effects for Direct and Indirect Impacts



Public Scoping Meeting Protocol

1. The purpose of the public scoping meeting is to give all interested people the opportunity to give their comments on the scope of the environmental assessment.
2. People wishing to make comments can do so by writing their comments on a form or making an oral statement to the court reporter.
3. People wanting to have their comments taken by the court reporter must register at the sign-in table. Please be courteous and respect the rights of all commenters.
4. Each commenter will be allowed 3 minutes with the court reporter.
5. People desiring more time may register to speak again with the court reporter. They will be given another opportunity to speak after all other registered commenters have had their chance.
6. You may either complete the forms today and leave them in the Comment Box or take them with you and mail them to the indicated address. All comments must be received by April 16, 2018.
7. You may also email your comments to KCIEAcomments@landrum-brown.com

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KANSAS CITY INTERNATIONAL AIRPORT

PUBLIC SCOPING MEETING

MARCH 15, 2018

6:00 P.M. TO 8:00 P.M.

AMBASSADOR BUILDING

KANSAS CITY, MISSOURI

PROCEEDINGS

MR. ADAMS: It is 6:00 p.m. on March 15th, 2018. My name is Rob Adams and I'm the hearing officer for tonight's public scoping meeting regarding the environmental assessment for the proposed replacement terminal project at the Kansas City International Airport.

Speakers may sign up to speak at the table and will be given three minutes to make their comment.

Comments need to be submitted by April 16th, 2018, which represents the end of the scoping comment period.

At this point, I'm officially opening the scoping meeting to any speakers who have signed up.

At this point, there's no speakers who have signed up so I will recess the hearing until such time as we have a speaker.

(Brief recess.)

MR. ADAMS: It is 8:00 p.m. on March 15th, 2018. I am officially closing the hearing portion of the public scoping meeting.

(Hearing concluded.)

CERTIFICATE

STATE OF KANSAS)
) SS.
COUNTY OF WYANDOTTE)

I, R. PATRICK TATE, a Certified Court Reporter, do certify that pursuant to Notice at The Ambassador Building, Kansas City, Missouri, the above matter came on for hearing, and the preceding constitutes a true and correct transcription of my stenographic notes then and there taken.

IN TESTIMONY WHEREOF, I have hereunto set my hand and seal this 19th day of March, 2018.

/s/R. Patrick Tate
Missouri C.C.R. 1239
Kansas C.C.R. 1608

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Eric R. Greitens
Governor

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

Sarah Steelman
Commissioner

February 27, 2018

Mr. Chris Babb
L&B
11279 Cornell Park Drive
Cincinnati, OH 45242

Subject SAI: 1808020
Legal Name: L&B
Project Description: Replacement Terminal Project Environmental Assessment Kansas City International Airport

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

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

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

Sincerely,

Sara VanderFeltz

Sara VanderFeltz
Administrative Assistant

cc:

United States Department of Agriculture

USDA

NRCS Natural Resources Conservation Service

3915 Oakland Avenue, Suite 103, St. Joseph, MO. 64506

March 6, 2018

Mr. Chris Babb
Landrum & Brown
11279 Cornell Park Drive
Cincinnati, OH 45242

Dear Mr. Babb,

This letter is in response to your environmental effects request letter dated February 13, 2018. Your letter was addressed to Jason Saunders, District Conservationist, Platte City, MO. The following comments pertain to the proposed project involving the construction project at the Kansas City International Airport. I have reviewed the proposed project and offer the following information for consideration in your environmental report:

1. Background Information-In 1981, the U.S. Congress passed the Farmland Protection Policy Act (FPPA) which directs USDA through NRCS to provide technical assistance to Federal agencies, and State and local governments or organizations that desire to develop programs or policies to limit the conversion of productive farmlands to non-agricultural uses.

2. The Goal of FPPA- is to minimize the extent to which Federal programs contribute to the unnecessary and irreversible conversion of important farmland to nonagricultural uses. More information can be found at http://www.nrcs.usda.gov/wps/portal/nrcs/detail/?ss=16&navtype=SUBNAVIGATION&cid=nrcs143_008275&navid=100170180000000&pnavid=100000000000000&position=Welcome.Html&ttype=detail&pname=Farmland%20Protection%20Policy%20Act%20%7C%20NRCS
As the web site explains, if areas are considered already in urban use, or are on existing right of way purchased before August 4th, 1984, than FPPA does not apply.
You can obtain site specific acres of prime farmland, and farmland of statewide importance by utilizing the Web Soil Survey. http://websoilsurvey.nrcs.usda.gov/app/

3. Review of the Proposed Project-Areas where distribution facilities or lines are constructed within road and highway right of ways, are determined "previously converted" to non-agricultural uses. Areas where the poles and guy wires are installed in cultivated fields and pastures will have only a minor impact on the conversion of important farmlands. Generally, buried cables and pipelines will not cause the conversion of important farmlands. **If areas can no longer be farmed due to new construction, or restricted access, they are subject to FPPA and a form AD-1006 should be completed.** If final construction does not eliminate any land from agricultural crop production, then FPPA does not apply.

United States Department of Agriculture

USDA

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3915 Oakland Avenue, Suite 103, St. Joseph, MO. 64506

4. The NRCS County Hydric soil lists can be obtained at the county NRCS field office, and on the Web Soil Survey. Hydric soils are soils that show properties of long term saturation, and have a high probability of being classified as a wetland. The Hydric soil list is also on line at the NRCS Web Soil Survey. If needed, site specific wetland determinations for non agricultural purposes can be requested from the U.S. Army Corps of Engineers, or from private consulting firms.

5. Erosion Considerations-If your project includes trenching, or construction activity that would destroy grass or vegetative cover, we recommend special attention be given to areas subject to soil erosion caused by rain and water flow. Even though most trenches are narrow, soil erosion can still be a significant hazard on slopes greater than 2 percent. Vegetation should be promptly reestablished on disturbed areas. The Missouri NRCS Critical Area Planting standard can be accessed on the electronic field office tech guide at http://www.nrcs.usda.gov/technical/efotg/

6. Soil chemical and physical properties based on the county soil survey can be accessed on Web Soil Survey. This would include soils data regarding saturated hydraulic conductivity, and soil particle size distribution. The soil survey is a general planning tool and should not be substituted for site specific soil investigations, or soil laboratory analysis.

7. Endangered Species- Some species may fall under state, and or, federal protection. If you have not already done so, I recommend that you contact the Missouri Department of Conservation regarding specific threatened and endangered species in the project area. MDC can be contacted at 2901 W. Truman Blvd, P.O Box 180, Jefferson City, MO. 65102, phone- 573-751-4115.

Based on the information you provided on the project area (Exhibit 3), NRCS will not have additional input into the project EA. The Farmland Protection Policy Act does not apply to land already in urban development. NRCS staff will not be attending the scoping meeting on March 15, 2018. If your project expands to include farmland areas, please notify us for comment. If you have any questions, please call me at 816-385-5786.

Sincerely,

David K. Kacirek
Area Resource Soil Scientist

cc: Grover DePriest, Area Conservationist, St. Joseph, MO
Jorge L. Lugo-Camacho, State Soil Scientist, Columbia, MO
Jason Saunders, District Conservationist, Platte City, MO

Chris Babb

From: Hundley, Joshua <joshua_hundley@fws.gov>
Sent: Thursday, March 8, 2018 8:54 AM
To: Chris Babb
Subject: Kansas City International Airport Terminal Replacement

Dear Mr. Babb,

The U.S. Fish and Wildlife Service (Service) will not be able to attend the agency scoping meeting on March 15 for the Terminal Replacement Project at the Kansas City International Airport. We could participate via the webinar, but there will not be any impacts to federally listed species based on the project footprint your provided.

Thanks,

Josh Hundley
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
Missouri Ecological Services Field Office
101 Park DeVille Drive, Suite A
Columbia, MO 65203-0057
573-234-5037 (office)

600 Broadway, Suite 200
Kansas City, Missouri 64105-1659

816-474-4240
816-421-7758 FAX
www.marc.org

MARC
MID-AMERICA REGIONAL COUNCIL

April 2, 2018

Landrum and Brown
Attention Chris Babb
11279 Cornell Park Dr.
Cincinnati, OH 45242
KCIEAcomments@landrum-brown.com

Dear Mr. Babb:

I enjoyed meeting you at the agency scoping meeting on March 15. This letter is to convey comments on behalf of the Mid-America Regional Council (MARC) regarding the environmental assessment scoping process for the new KCI airport terminal. MARC is the regional and metropolitan planning organization for the nine-county, bi-state Kansas City area.

During your presentation, your firm capably described impacts to be assessed through the upcoming NEPA process. I have every confidence that your study will thoroughly address all relevant regulatory concerns. The comments provided here, then, suggest an approach that goes beyond mitigation to assess opportunities to enhance or restore environmental quality wherever possible. Said differently, the project should seek to make conditions better, rather than merely make them less bad.

The basis of the recommendation is derived from the MARC Board of Directors adopted vision of sustainability, to simultaneously enhance the vitality of Kansas City's economy, environment and community for current and future generations. A series of Board adopted plans and strategies related to transportation, green infrastructure, air quality, climate resilience, and energy efficiency and conservation provide conceptual guidance for a range of potential restoration strategies.

Energy
The Kansas City, Missouri Climate Protection Plan, and MARC's Clean Air Action Plan and Climate Resilience Strategy each recommend high performance buildings that maximize energy efficiency and renewable energy. A state of the art approach might adopt living building standards, making the new terminal carbon positive through expansive investments in efficiency and solar energy. Extensive land restoration on other airport property with native plantings could offset remaining greenhouse gas emissions through the remarkable levels of carbon sequestration attainable in healthy prairie ecosystems.

Green Infrastructure
MARC published a green infrastructure framework in 2016. The framework seeks to maximize the many benefits that might be obtained through strategically focused green infrastructure planning and design – whether focused on air and water quality, energy conservation, heat island abatement, habitat, flood risk reduction, walkability, or other issues. At the airport, two key issues may be noted.

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First, the current airport configuration includes enormous surface parking lots that do not treat the water quality storm, per the city-adopted MARC/APWA Manual of Best Management Practices to Protect Water Quality. Stormwater management and sustainable site design measures employed at existing, or proposed new parking structures would be invaluable. Second, outside of the terminal area, the airport includes thousands of acres of land, including several high quality streams. Opportunities exist to conserve and restore existing streams and to restore native prairies on significant tracts within the airport property. Aside from the potentially significant habitat value of these investments, prairie plantings could sequester greenhouse gas emissions at a level that would be commensurate with emissions from aircraft using the airport.

Transportation
As part of MARC's regional transportation planning efforts, the MARC Board adopted Smart Moves 3.0, a plan to enhance the quality and accessibility public transportation in the metropolitan area. The plan notes an opportunity to create a mobility hub at KCI, creating increased frequency of transit service for all airport users.

Regional air quality plans have long advocated for alternatively fueled transportation fleets. The airport has long been a leader in the use of renewable fuels to reduce ground level ozone. The next step in this process would be to fully convert the fleet to electric vehicles, and charging those vehicles through solar installations at the airport.

Given anticipated changes in transportation technology, the airport may consider future autonomous, connected, electric and shared vehicles in land-side access to the airport, especially in the design of terminal parking, terminal curbside access and access to satellite parking, rental car facilities, and mobility hubs.

Last, as noted above, decisions regarding parking lots at the airport should consider sustainable parking lot design practices, and be informed by interrelated understandings about autonomous vehicles and public transportation.

We thank you for the opportunity to share these comments. If you would like to discuss these issues in more depth, please feel free to contact me at tjacobs@marc.org or at 816/701-8352.

Sincerely,

Tom Jacobs
Director, Environmental Programs

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Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Eric R. Greitens, Governor
Carol S. Comer, Director

APR 1 3 2018

Mr. Chris Babb
Landrum & Brown
11279 Cornell Park Drive
Cincinnati, OH 45242

Dear Mr. Babb:

The Missouri Department of Natural Resources appreciates the opportunity to review the Proposed Replacement Terminal Project for the Kansas City International Airport. The Department offers the following comments for consideration. First, we recommend Landrum & Brown create a clearer distinction between the "Use Existing Facilities" alternative and the "No Action" alternative when developing the EA.

The Department encourages Landrum & Brown to utilize the tools available at http://dnr.mo.gov/gis/ to ensure compliance around hazardous waste sites, underground storage tanks, and water bodies in the area of disturbance.

According to the National Wetlands Inventory https://www.fws.gov/wetlands/, there are freshwater wetlands and ponds within the project area. Care should be taken to avoid 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, care should be taken to protect water quality. While these water bodies are not assigned specific designated uses, they are protected by Missouri's general water quality criteria.

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/.

Mitigation

Landrum & Brown should submit an alternatives analysis prior to any impacts to jurisdictional waters as part of the avoidance and minimization measures that precede mitigating unavoidable impacts.

Recycled paper

Mitigation for wetlands should be in conformance with the *State of Missouri Aquatic Resources Mitigation Guidelines* while mitigation for streams should be in conformance with the *Missouri Stream Mitigation Method.*
https://dnr.mo.gov/env/wpp/401/docs/mitigation_guidelines.pdf
http://www.mvm.usace.army.mil/Portals/51/docs/regulatory/May_2013_Missouri_Stream_Mitigation_Method.pdf.

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

Land Disturbance

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

Information and application for online land disturbance permits are located at http://www.dnr.mo.gov/env/wpp/epermit/help.htm. Questions regarding permit requirements may be directed to the Department's Kansas City Regional Office at 816-251-0700.

We appreciate the opportunity to provide comments for the Proposed Replacement Terminal Project for the Kansas City International Airport. If you have any questions or need clarification, please contact Mr. Rob Hunt with the Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102 or by phone at 573-522-2656. Thank you.

Sincerely,

Rob Hunt
Planning Coordinator

RH/rhm

SECTION 106 AND NEPA SCOPING OF KCI'S NEW TERMINAL:
KCI AS A TRADITIONAL CULTURAL PROPERTY (TCP)

DATE: 3/8/18
TO: Mr. Mr. Chris Babb, Consulting Manager, Brown and Landrum Consultants; Dr. Toni Prawl, Missouri State Historic Preservation Office; Mr. Pat Klein, Director of Aviation.
FROM: Dr. L. Mark Raab, on behalf of the Watkins Foundation of Kansas City, Missouri
RE: Scoping of Section 106 and NEPA compliance of new Kansas City International Airport Terminal

PURPOSE OF THESE COMMENTS

These comments convey concerns of the Watkins Foundation of KCMO and descendant communities about appropriate treatment of historical and cultural resources located in Kansas City International Airport (KCI), as KCI prepares Section 106 and NEPA studies for construction of a new airport terminal complex (under provisions of Section 106 of the National Historic Preservation Act (NHPA) of 1966, the National Environmental Policy Act (NEPA) of 1969, and Federal Aviation Administration (FAA) compliance standards).

The heart of our concerns are the varied and detailed findings that demonstrate KCI as a Traditional Cultural Property (TCP), as provided by Section 106 and FAA compliance standards (FAA 1050.1F Desk Reference, Section 8.2.3.2, July 2015):

> *"A TCP is generally defined as a property that is eligible for the NRHP because of its association with cultural practices or beliefs of a living community that are rooted in that community's history and are important to maintaining the continuing cultural identity of the community."*

Below, we summarize the data that support a finding of the airport as a TCP, and the implications of such a finding for construction of the airport's new terminal. Our comments are divided into the following main headings:

1.0 KCI AS A TRADITIONAL CULTURAL PROPERTY (TCP)
2.0 AREA OF POTENTIAL EFFECT (APE) OF TERMINAL CONSTRUCTION
3.0 APPROPRIATE IMPACT MITIGATION PROCEDURES

1.0 KCI AS A TRADTIONAL CULTUAL PROPERTY (TCP)

KCI's approximately 11,000 acres is a largely intact rural, 19th Century landscape containing documented archaeological sites linked to known slave-owning farmers and their slaves. Moreover, surviving descendant individuals and communities, Euro-American and African American, trace their direct descent and cultural identity to these sites, as demonstrated by a variety of data. Three lines of evidence-- archaeological data, descendant histories and legal precedents-- make a convincing case for protecting KCI as a traditional cultural property (TCP) under provisions of federal law:

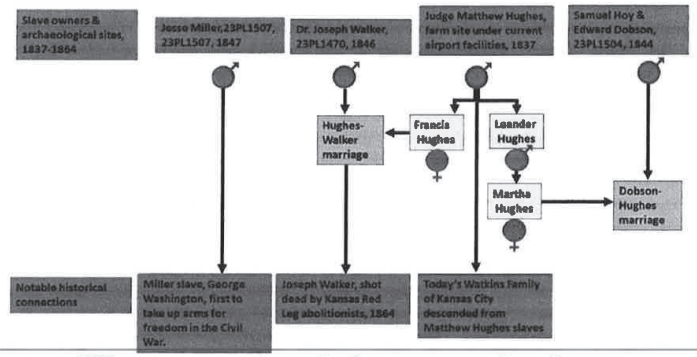
ARCHAEOLOGICAL DATA

In a previous airport Section 106 study, three historical archaeological sites were reported to KCI as potentially eligible for inclusion in the National Register of History Places (Criterion D, 36CFR800 et al.).

These three sites, all slave-owning, were subsequently the object of intensive Phase II and III archaeological data recovery investigations, as reported to the airport in Sturdevant-ERC (2009). These investigations included a detailed reconstruction of the historical context of these sites, altogether entailing many thousands of hours of archaeological and historical research. An extraordinarily detailed picture of ante-bellum slave-owing society on the Missouri frontier emerges from this research, including substantial sub-surface architectural remains and a wide range of artifacts associated with life on wealthy, slave-owning hemp plantations of Missouri's Little Dixie. Historical research on these sites shows a high degree of inter-marriage by the farms' slave owners, and likely their slaves. *There is no question that the tightly-knit social networks among slave owners and their slaves formed a cultural landscape, and one of the most documented of its kind in Missouri, and on the larger mid-19th century American frontier.*

Figure 1 below displays some of the 19th Century cultural networks and descendant relationships that are linked the archaeological sites reported in Sturdevant-ERC (2009).

Figure 1: KCI Cultural Landscape and Associated Archaeological Sites



KCI: Four Archaeological Sites and Their Slave Owners

DESCENDANT EVIDENCE

On-going research by Dr. Dawn C. Stricklin of Columbia College, Columbia, Missouri, shows that living individuals and communities can be traced to 19th Century individuals and families, slaves and slave owners, who lived on the archaeological sites described above. Based on continuing, pains-taking research on tax records, military pension records, probate records, slave registers, family oral histories and other sources, Dr. Stricklin's data (Stricklin 2018) documents definitive descent of living persons from the slave owners and slaves outlined in Figure 1. An important example is the African American Watkins family of Kansas City, Missouri. Bruce R. Watkins, Jr. is the son of Bruce R. Watkins, first African American Kansas City Council Member and civil rights pioneer. Bruce R. Watkins, Jr. is curator of the Watkins Culture Center of Kansas City, an influential cultural and civic organization. Another important

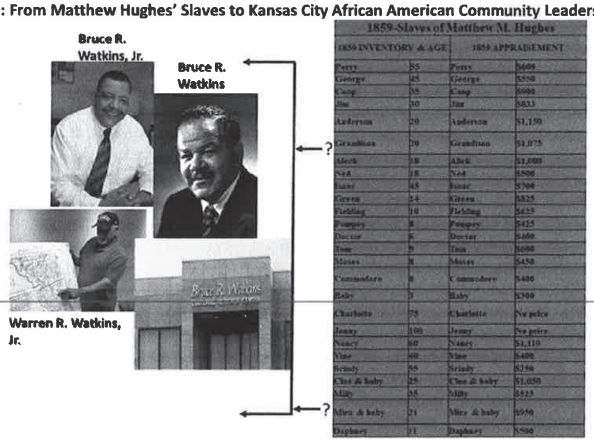
example is Warren R. Watkins, Jr., president of the Watkins Foundation of Kansas city, Missouri, a community educational resource in African American history and culture, including slave history.

Watkins family oral history has long identified the 19th Century "Hughes Plantation" in today's KCI as the home of the family's slave ancestors. Dr. Stricklin's research has documented this lineage (see Figure 2), showing that the Watkins family is descended from slaves owned by Matthew Hughes in Figure 1, whose slave-holding farm once existed where the current airport was built, and had direct marriage and inheritance ties to two of the other archaeological sites shown in Figure 1.

Yet another example is the late Dr. Jimmy Johnson III, African American archaeologist who originally excavated the Miller Plantation (23PL1507), shown in Figure 1. Dr. Johnson's great-great grandfather, George Washington, escaped to Kansas and joined the Kansas Colored First Infantry Regiment, the first African American unit of the Civil War to take up arms against Confederate forces (Bates County, Missouri at the Battle of Island Mound (today's Island Mound State Park).

The Watkins and Johnson families are only a small subset of the slave descendants that can be connected to KCI cultural resources. Dr. Stricklin's research reveals potentially thousands of descendants of slaves who once occupied KCI.

Figure 2: From Matthew Hughes' Slaves to Kansas City African American Community Leaders



1859-Slaves of Matthew M. Hughes

1859 INVENTORY & AGE		1859 APPRAISEMENT	
Perry	55	Perry	$600
George	45	George	$550
Cesp	35	Cesp	$900
Jim	30	Jim	$833
Anderson	20	Anderson	$1,150
Grandison	20	Grandison	$1,075
Alerk	18	Alerk	$1,000
Ned	18	Ned	$500
Isaac	15	Isaac	$700
Green	14	Green	$825
Fielding	10	Fielding	$425
Pompey	8	Pompey	$425
Doctor	6	Doctor	$600
Tom	9	Tom	$600
Moses	8	Moses	$450
Commodore	8	Commodore	$400
Baby	3	Baby	$700
Charlotte	75	Charlotte	No price
Jenny	100	Jenny	No price
Nancy	60	Nancy	$1,110
Nine	40	Nine	$400
Brindy	35	Brindy	$250
Chas & baby	25	Chas & baby	$1,050
Milly	35	Milly	$825
Mirs & baby	21	Mirs & baby	$950
Daphney	11	Daphney	$500

LEGAL PRECEDENTS

Legal precedents clearly demonstrate that descendants of persons outlined in Figure 1, including Euro-Americans and African Americans, attach important historical and cultural significance to KCI (Missouri Court of Appeals, Western District, 2009). In 2008, KCI petitioned the Circuit Court of Platte County, Missouri (ibid) to disinter and relocate human remains in four 19th Century cemeteries located on airport

land: Brightwell Cemetery, the Miller-Rixey Cemetery, the Samuel Hoy Cemetery, and the Kimsey Cemetery. Two of these cemeteries are associated archaeological sites shown in Figure 1: Jesse Miller Plantation (23PL1507) and the Samuel Hoy farm (23PL1504).

Living Euro-American descendants of persons buried in these cemeteries opposed the airport's petition, and trial and appeals courts sided with the descendants against the airport. However, African American descendants, including Warren R. Watkins, Jr. and Bruce R. Watkins, Jr. shown in Figure 2, opposed removal of these burials on grounds that unmarked burials of their slave ancestors almost certainly exist in vicinity of the historic slave-owning farms and their associated cemeteries shown in Figure 1. These descendants argued that any plans to move the marked cemeteries or build land-disturbing developments around locations that once included slave-owning farms should make a reasonable effort to detect and move unmarked graves (archaeological construction monitoring).

Trial court gave credence to the concerns of African American descendants by appointing them counsel and *guardian ad litem* for unknown and unrepresented respondents who opposed the airport's plans, recognizing that the concerns of parties like the Watkins family should be heard and represented in the case. Commenting on this logic, trial court further commented:

"Many people believe that there are unmarked slave graves among and around these four cemeteries. Certainly there were many slaves in Platte County before the Civil War, and slaves were known to have been buried in and around family cemeteries like the ones at issue, but preliminary searches of suspected slave burial sites near the family cemeteries have not yielded any signs of human remains." (Missouri Court of Appeals, Western District, 2009).

This assessment by the court merely expresses the reality that during the 19th Century, occupants of farms like those in Figure 1, including slaves, were typically buried in or around family cemeteries on farm property, and that the resulting graves may or may not have been permanently marked and therefore detectable today from surface markers. That unmarked slave graves have not been discovered to date does not lessen the virtual certainty of their existence. Nor does it lessen the historical and cultural significance attached by African American descendants to slave-owning farms (archaeological sites) and their associated human burials. *These Legal precedents clearly document that living descendant communities attach important historical and cultural significance to KCI and its archaeological resources.*

For all its remarkable findings, the airport's previous Section 106 investigation (Sturdevant-ERC 2009) was not tasked with the question of whether the sites discussed above and their history have direct ties to living individuals and communities; i.e., whether KCI's 19th Century cultural landscape and its surviving archaeological resources are a Traditional Cultural Property (TCP) for living groups of people. Based on evidence summarized above, but not limited to these data, surviving African American and Euro-American families have active and significant historical and cultural connections to KCI and its archaeological resources. Among these are ancestral graves, marked and unmarked, and the 19th Century cultural landscape that survives in the airport's archaeological record. These communities include surviving African American slave descendants in Kansas City, Missouri and other states. These varied and detailed findings make a strong case for KCI as a TCP, as defined by Section106 and the FAA's compliance standards:

> *"A TCP is generally defined as a property that is eligible for the NRHP because of its association with cultural practices or beliefs of a living community that are rooted in that community's history and are important to maintaining the continuing cultural identity of the community."*

2.0 AREAS Of POTENTIAL EFFECT (APE) OF NEW TERMINAL CONSTRUCTION

Section 106 and NEPA require projects like the new airport to consider Areas of Potential Effect (APE) that are both short- and long-term. Section 106 considers the immediate possible effects of a project on specific historical properties, such as the types of archaeological sites noted Figure 1. NEPA says that *long-term, indirect and cumulative effects* on historical/archaeological resources must also be part of the planning process, if such effects are reasonably foreseeable. It is reasonably foreseeable that more of the airport's 11,000 acres will be developed in response to construction of the new airport. The airport's master plan calls for such long-term development. Accordingly, the new airport's construction should take into account both short-term and long-term, cumulative effects of the project's APE on historical/archaeological resources. Impact mitigation strategies included in of the current Section 106/NEPA plan should address short- and long-term impacts (see Section 3.0 below).

2.1 New terminal construction should consider the project APE to include not only the "footprint' of the new terminal building itself, but also any potentially ground-disturbing activities around it, including things like haul roads; equipment and supplies storage yards; utility pads and trenches and vaults, new roads; runway modifications, etc.

2.2 Given the possibility of buried, unmarked archaeological remains, including human graves, associated with the archaeological resources described above, the APE should consider the possible discovery of such resources during construction excavation.

Ample precedents show that archaeological remains like those described above sometimes survive under existing structures, pavement, roads and other facilities. Historical records show, for example, that the farm of Matthew Hughes, shown in Figure 1, existed under the current airport complex. The possibility that archaeological remains or this or other past settlements and graves exist under present airport constructions should not be dismissed, but rather form part of the planning for the new terminal.

2.3 It should be recognized that loss over time of important archaeological resources like those described in Figure 1 is a significant *cumulative impact* on a protected resource, as defined by NEPA.

The new airport's impact mitigation plan should include explicit provisions for managing the contingencies described above. (See Section 3.0 below).

3.0 APPROPRIATE IMPACT MITIGATION PROCEDURES

We strongly recommend that the airport's new Section 106/NEPA plan include strategies which offer effective ways of mitigating short-term and long-term, cumulative effects on historical/archaeological resources.

3.1 Nominate the airport as a Traditional Cultural Property (TCP) for listing on the National Register of Historic Places (NRHP), based on the following significance criteria (36CRF800, and as amended:

Criterion A, "Event," the property must make a contribution to the major pattern of American history (e.g., expansion of slavery onto the 19th Century American frontier; contributions of KCI settlers to Missouri-Kansas Border War and Civil War; post-Civil War development of Kansas city).

Criterion B, "Person," is associated with significant people of the American past. (e.g., George Washington, runaway slave; connected to Missouri Island Mound State Park; Joseph Walker, secessionist, killed by Kansas abolitionist forces, Figure 1, and others.)

Criterion D, "Information potential," is satisfied if the property has yielded or may be likely to yield information important to prehistory or history (e.g., KCI's rural, largely intact 19th Century cultural landscape, including sites in Figure 1., are exceptionally well preserved examples of life on the mid-19th Century American frontier and how that frontier was shaped by the spread of slavery and its related social and economic institutions.)

3.2 Adopt an airport cultural resources management plan that includes appropriate archaeological construction monitoring for detecting and preservation of buried cultural resources, including unmarked human graves.

3.3 Install exhibits in the new airport terminal that interpret to the public the important cultural and historical events associated with the airport, including the airport as a Traditional Cultural Property.

References Cited:

Sturdevant, ERC

2009 Cultural Resource Investigations 23PL1470, 23PL1504 & 23PL1507 Kansas City International Airport Platte County, Missouri, FAA Project, Prepared for: City of Kansas City, Missouri, prepared By: Environmental Research Center of Missouri, Inc. 1201 Moreau Drive Jefferson City, Missouri.

Stricklin, Dawn C.

2018 KCI Slave Holding Families v. 1-25-18, manuscript in author's possession.

Missouri Court of Appeals, Western District

2009 IN RE: The Matter of The REMOVAL OF HUMAN REMAINS FROM CEMETERIES IN KANSAS CITY, PLATTE COUNTY, Missouri. City of Kansas City, Missouri, Appellant, v. Unknown and Unrepresented Persons and Olin Miller, Respondents. No. WD 70006. Decided: November 10, 2009

COMMENT FORM
PUBLIC SCOPING MEETING
KANSAS CITY INTERNATIONAL AIRPORT
ENVIRONMENTAL ASSESSMENT AND SECTION 106 REVIEW
March 15, 2018

Welcome to the Public Scoping Meeting for the City of Kansas City, Missouri Aviation Department's Environmental Assessment and Section 106 Review for the Proposed Replacement Terminal Project at the Kansas City International Airport. This comment form is provided to receive your input and ensure that your comments are considered. Please use this form to submit written comments. Either place the form in the comment box at the Public Meeting, or mail to the address below not later than 5:00pm Monday, **April 16, 2018**.

Before including your name, address and telephone number, email or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information - may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Based on my experience with airport construction, I have a recommendation for those working on KCI Airport. To utilize as many local waste management vendors in Kansas City as possible. Do not leave the procurement up to each subcontractor on the project - choose a centralized procurement team that knows the KC market & vendors well so we ~~do~~ utilize our 501 local vendors at the best price with the best service possible for KCI. We'd love to be that team for you!
- Alexis Albright President & CEO Exceptional Waste Solutions, LLC
816-349-7010

Submit comments to:

Chris Babb
Landrum & Brown
11279 Cornell Park Drive
Cincinnati, OH 45242

FROM (Please Print):
Name: Alexis Albright
Address: 18011 NW Jaile Ct. Ste 100 KCMO 64152

COMMENT FORM
PUBLIC SCOPING MEETING
KANSAS CITY INTERNATIONAL AIRPORT
ENVIRONMENTAL ASSESSMENT AND SECTION 106 REVIEW
March 15, 2018

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Due to the significance of the Freedom's Frontiers Heritage Area and the existing familial connections to the historic and archeological sites on airport property, I feel it is required to make sure that the Section 106 plan contains provisions for archaeological monitoring and mitigation of any sites moving forward. Additionally, the airport should serve as a place to present and interpret the history of the area.

Submit comments to:

Chris Babb
Landrum & Brown
11279 Cornell Park Drive
Cincinnati, OH 45242

FROM (Please Print):
Name: Dr. Ann M. Raab, RPA
Address: 612 Edward St Weston, MO 64098

COMMENT FORM
PUBLIC SCOPING MEETING
KANSAS CITY INTERNATIONAL AIRPORT
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March 15, 2018

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MY INTERESTS ARE PRIMARILY CONFINED TO THE ENVIRONMENTAL IMPACT CATEGORY OF HISTORICAL, ARCHITECTURAL, ARCHAEOLOGICAL, AND CULTURAL RESOURCES. MY MATERNAL ANCESTORS, THE OFFUTT FAMILY SETTLED IN PLATTE COUNTY IN THE 1850's, HAVING RELOCATED FROM KENTUCKY. I HAVE ANCESTORS BURRIED IN A NUMBER OF PIONEER CEMETERIES IN PLATTE COUNTY. MY GREAT-GREAT GRANDMOTHER, ACHSTA SETTLES, SISTER OF SLAVE OWNER, JESSE MINER, IS BURRIED IN THE MINER-RIXEY CEMETERY. MANY OF MY ANCESTORS ARE BURRIED IN CEMETERIES LOCATED ON LAND CONTROLLED BY THE AIRPORT AUTHORITY.

Submit comments to:

Chris Babb
Landrum & Brown
11279 Cornell Park Drive
Cincinnati, OH 45242

FROM (Please Print):
Name: THOMAS M. KEVIN
Address: 26310 S. HICKORY TRAIL
HARRISONVILLE, MO 64701

Comment Form **Public Scoping Meeting**

E.A. & Section 106 Review **March 15, 2018**

To properly assess, plan for, construct, manage construction and mitigate for any significant environmental impacts for the new airport we must consider the following:

Systems Thinking

We need to think of the airport footprint as a system - considering how all the parts affect each other, the people there and the environment around it. Too often the amalgam of developers, architects, government agents, construction companies and affiliated professionals dealing with a project fail to do this to the detriment of water and air quality, natural resources and energy supplies for a particular site. Although I was assured anything constructed would be to LEED Gold standards, this rating level is now viewed as only a starting point when considering sustainable development. We have the opportunity to be much more aspirational with this project. Fly-over states remain so if they retain a fly-over mentality.

When the Council for Environmental Quality established NEPA they did not do so with the intent to meet minimum standards. Indeed, according to the Act they set out to formulate and recommend national policies which ensure that the programs of the Federal Government promote *improvement* of the quality of the environment.

With that being said, we should optimize every part of the new airport system by making elements as multi-functional as possible. An example would be using planted areas for noise absorption, healthy air and water filtration as well as beauty. In progressive ventures looking to move toward net-zero or restorative status, planted areas are now sometimes also being utilized for food and employee well-being.

Exterior Footprint

Landscaping the majority of the airport footprint with native plants and grasses not only cuts the long-term need for regular mowing and heavy maintenance, it also welcomes visitors to the Heartland with the vegetation which yields half our moniker, Paris of the Plains. The grasses and forbs used do not need to be uniformly thick or tall and in fact, diversity is a plus. Edges mowed in an undulating pattern can enhance the purposeful look of the area and repetition of undulating edge patterns in the parkways leading to and around the facilities can further imbue the area with a "purposeful" landscaping look.

Although birds and deer have been mentioned as being a hazard, FAA reports show less than 75 bird strikes for 2016 (as an example) and of those, less than a handful are ground-nesting birds. Additionally, only two reports noted any damage (a dent on one and some damage under the pilot's area on the other). Seven of the reports indicating strikes were detected from 1 to 15 miles away from the airport –

nowhere near the grounds. Furthermore, some reports registered only blood stains or similar biological traces – indicating the strike may have been at the flight's point of origin instead of MCI. Because Kansas City is located in the Central Flyway (and the western portion of the Eastern Flyway) birds will continue to be present at the site. The FAA lists a number of non-pesticide/herbicide remedies to limit strikes which could be used in a practical manner. In fact, in a recent public meeting regarding the airport, several citizens suggested a running route and/or recreational facilities around the perimeter which could help curtail bird and deer populations as would necessary security fencing (which does not currently encircle the entire property). Fencing, of course, is in response to deer. With regard to deer, it should also be noted that although they are able to jump up to 15 feet, they rarely do.

Planting beds close to the airport should also be planted in native plants. After initial planting and regular maintenance in the first three years, maintenance is somewhat reduced and survivability is immediately heightened as these plants are used to this region's weather and soils. When planted and maintained correctly, native plants yield environmental, economic and aesthetic benefits.

Water

- Green infrastructure with native plants can help slow, filter and infiltrate stormwater runoff. It has the additional benefit of often being less expensive and more effective (especially long-term) than many types of gray infrastructure.

- With regard to water supply, rainfall capture from rooftops and parking lots could be routed for use in any watering systems and even toilets - as has been done in other parts of the country.

- Auto-off faucets should be deployed and gray water recycled.

- If irrigation is used at all, drip irrigation uses much less water than spray irrigation; and moisture sensors should be deployed to avoid expense and waste of over watering.

- Water can also be used as an aesthetic feature in conjunction with several of its utilitarian purposes as indoor streams (See Knoxville, TN airport), water treatment (See Anita Gorman Discovery Center) and even education.

Energy

- Examine biomimetic energy management units for HVAC (like Encycle monitors) to manage peak demands.

- Installation of a green roof can serve energy and noise reduction goals by insulating both from temperature extremes and noise while also reducing runoff. To retard possible nesting, such rooftop sites can be used for visitor seating and walking areas as well.

- On-site alternative energy makes sense from both an environmental and financial perspective. Such placement can insulate the airport from rising utility costs in addition to moving away from dirty power options. In addition to solar and wind, geothermal could be a good option to deploy. It is critical that both initial and long-term investment and return-on-investment be considered for this project.

- If wind energy is used, consider investigating and installing a version of Cal-State's vertical wind turbines placed in "flock" or "school" formation to take advantage of wind vortices coming off the neighboring turbines.

- Also consider installing SMIT's solar ivy for energy harvesting as well as shading southern building facades.

Thank you for the opportunity to comment.

Margo Farnsworth

13223 N. Virginia Ave.

Smithville, MO 64089

The Missouri Archaeological Society
Established 1935

Missouri State University
901 S. National
Springfield, MO 65897

(417) 836-3773
fax: (417) 836-6335

mas@missouristate.edu
http://associations.missouristate.edu/mas/

April 9, 2018

Mr. Chris Babb, Landrum and Brown Consultants; Mr. Pat Klein, Director of Aviation, City of Kansas City, Missouri

Dear Sirs:

Re: Section 106/NEPA Plan for the New Kansas City International Airport

The Missouri Archaeological Society (MAS) was founded in 1935 and is the state's oldest and largest archaeological organization. The Society's membership includes professional and avocational archaeologists from all walks of life and all regions of the state. The MAS Board is aware of the past history of activities undertaken with respect to airport property, including previous archaeological work by ERC.

The MAS strongly recommends that the Section 106/NEPA plan includes measures to protect and interpret the extraordinary archaeological and historical resources within KCI's 11,000-acre property, including areas affected by construction of KCI's new terminal complex.

The MAS urges KCI to recognize and protect the rich archaeological and cultural heritage found on airport lands. Developments like the new airport create challenges and opportunities for heritage protection. One of the most important challenges will be mitigating the potential impacts of the new terminal complex itself, as well as the long-term cumulative impacts of land development that the new airport is certain to create on the airport's total landholdings. At the same time, construction of a new airport offers an exceptional opportunity to educate the public about Missouri archaeology and history in the form of educational exhibits. Accordingly, we highly recommend that the forthcoming Section 106/NEPA plan incorporate the following:

1. The creation of a comprehensive Cultural Resources Management Plan (CRMP) for managing the airport's heritage resources as part of the airport's larger planning process.
2. The recognition that historically underrepresented communities, particularly African-American and Native-American communities, have direct cultural and historical links to the airport's archaeological and historical resources.
3. A plan for public educational interpretation of the airport's archaeological and historical legacies in exhibits incorporated into the new terminal. These exhibits would be an excellent way of mitigating possible impacts of airport land development and a positive opportunity to make the airport a major cultural and educational resource for the community and the many millions of airport visitors.

Sincerely,

A. Clark Montgomery

A. Clark Montgomery
President

cc: Dr. Toni Prawl, Missouri State Historic Preservation Office
Dr. Andrea Hunter, Osage Nation Tribal Historic Preservation Office

COMMENT FORM

PUBLIC SCOPING MEETING

KANSAS CITY INTERNATIONAL AIRPORT

ENVIRONMENTAL ASSESSMENT AND SECTION 106 REVIEW

March 15, 2018

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Julia I Brown 1708 4TH ST PLATTE CITY MO 64079

Shirley I. Kimsey 16035 N Winans Platte City Mo 64079

Elizabeth George 1115 2ND St. Platte City, Mo

Gordon Baker Jr 11115 BAKER RD PC MO 64079

We would like to know how the Airport could be put up for a vote when there was no design and no contractor. How much additional did this cost to the price because of the additional meetings, Since the nAirport is in Platte County, why is only the part in KC allowed to vote?

I will not give up making sure no more cemeteries are destroyed. When the land was anneed and the Airport built, cemeteries were listed and laws have been established. See that the law is followed

Submit comments to:

Chris Babb
Landrum & Brown
11279 Cornell Park Drive
Cincinnati, OH 45242

FROM (Please Print):
Name: Shirley I Kimsey
Address: 16035 N Winan
Platte City, Mo 64079

From: olin@jblbinsurance.com
To: KCIEA Comments
Cc: "Pat Kline "; "Warren Watkins"; "Norton Rixey"; "Bill Knighton"; "Frank Offutt "; George Offutt; dstricklin@cougars.ccis.edu
Subject: Cemeteries ON KCI Airport Property
Date: Saturday, April 14, 2018 6:51:46 PM

Dear Mr Babb 0 I am Olin Miller from Platte City, MO. I was the local descendant who 's name you will see on the 2007 Lawsuit and judgements that required the KCI Airport to leave the cemeteries located on there property intact at the sites where they wre located.. I understand that you are doing a study to help the Airport folks comply with Federal section 106 and other Federal regulations. In the notes that follow I will attempt to help you with what information the local historians and folks raised in the area can provide you. Up to this point we have been somewhat ignored. I have taken Mr. Pat Klien on a driving tour of the Airport Properties that lie north, west, and south of the KCI funrays. It is fun to travel the largest wildlife preserve in northwest Missouri. I will try and take you on a written tour of this area in the documents below. I would also be willing to take you and your crews out to the known sites on the KCI Property which I will mention below.

There have been several studies done over the years by ERC out of Jefferson City, MO. I have had several good laughing sessions looking at his works. He has never consulted with the local folks. To any degree. The reason I have laughed at his work has to do with his efforts on the old Brightwell Farm to explore for a cemetery where he took a back how and cug up the site of an old barn. They have also missed the sites of several old log homes which are still visable on the property. But have been missed by Mr Sturdavent.

In some of the works I have been reading the folks writing have started to piece the family historys together. What most folks do not realize is that when a family moved from Virginia or Kentucky to Missouri they settled in the old state up to Clay County. Most of these families when they moved west came as entire families with grandparents, Parents and children and negro slaves. As an example the Brown Family came with parents, eleven children some of whom were married and had several children of there own. We will deal with several of there children and grandchildren in the notes that follow. What many folks today do not realize is that when a family owned a quarter section of land and the next family was a quarter to a half mile away you did not have that many folks close at hand so children married there neighbors children which sometimes included first cousings. Do to this close relations I am related personally to folks buried in the following cemeteries. –Miller-Rixey Cemetery, Brightwell Cemetery, Samuel Hoy Cemetery, William Hoy Cemetery, Kimsey Cemetery, Pembrock-Cooper Cemetery and the Daniel Jones Cenetery.

Dawn Striclin has been working for the Watkins Foundation to learn who owned slaves in the areas owned by the KCI Airport. I know that this is helpful but it does not tell the complete story of the family historys to help locate these graves most of which are not marked. A big part of the problems in locating the cemeteries on this land was caused byy Union forces buring the Platte County Courthouse in December of 1861. So while some records can be pieced together many of the wills and probate records were destroyed. Therefore word of mouth and information known by local farmers has to help fill in the missing pieces.

I will give you information I have by using the cemetery names. I will also try and show the ties between the families. I will start at the north end of the KCI Property and work my way south.

Daniel Jones Family Burial Grounds. - Daniel Jones and his wife Serena and several of there children are buried here. The cemetery had a stone wall around it which the KCI Director had demolisned sometime after 2000. I have several letters documenting the existence of this cemetery. When Pat Klien visited the site with the former owner Noah William Wills we found the site have not ben back to clean it up. At the time we located the site I also located several slave graves adjacent to the site of the old family cemetery. This cemetery is located in Section NE ¼ of Section 20, Twn 52 N, Range 34W, Platte Coutny MO In the notes of Dawn Stricklin she showed George Washington Jones who owned 15 slaves. He owned land in sectionsection 16 ½ mile east of his fathers property. . This son went back to Virginia to get his wife and bring her west in the spring aftr completing his census form. He died and was buried in Kentucky. Paxton Annuals shows Daniel Jones handled his estate.. I have not attempted to read the will which is on microfilm to see what happen to his slaves. The wife went back to Virginia and later married a second time. George Washington Jones had no children. Daniel Jones had a second son Rodham Jones who owned land east of the I-29 hwy cooridor. He died in the 1850s and is probably buried in the Daniel Jones cemetery alont with his wife.. Rodhams small children were raised by his sister Margaret Jones Waller Miller and appear on the 1870 census of Jesse Miller (Miller-Rixey Cemetery). When Daniel Jones moved to Platte County he had given his daughter Margaret a baby slave as a wedding present. This young boy was the great grandfather of Jimmie Johnson (Miller-Rixey Cemetery). Until he was old enough to be able to help on the farm he was raised by his negro mother on the Daniel Jones farm. His mother is one of the negro slaves buried at the Daniel Jones Cemetery site. Mahala Jones was a single lady who lived with her parents until there death. She moved to live with her sister Margaret Jones Waller Miller and later moved to a different county and is buried near some of her nieces an. Daniel Jones had a simple son who was buried in the Miller-Rixey Cemetery. The Daniel Jones property was sold in the mid 1850's to Warner Jackson Miller. Caption Warner Jackson Miller had some slaves. We have no information on these negro persons. We know that all of the Warner Jackson Miller family are buried in the Platte City Cemetery. However we have no information his slaves. There are many relatives of the Jones family living in the Platte City area.

The Pemberton- Cooper Cemetery = Is located in the E ½ of the NE ¼ of section 19, Twn 52, range 34. Platte County, MO. There are either 4 or 5 graves at this site. There might also be unmarked slaves graves. Mrs Pemberton and Mrs Cooper were sisters to Samuel Hoy and William Hoy. The family returned to central Missouri prior to the Civil War do do the very harsh conditions and the need for help raising several children after ther mothers had passed due to illiness. This cemetery sits on an old farm site where the home was torn down but two more modern pole parns are still in place..

The Brightwell Cemetery - This Family Burial Grounds was established in the will of Grandville Brightwell. The Will shown in part of the documents presented by Dawn Stricklin clearly sets the land aside as a Burial Ground (Cemetery) Therefore the KCI Airport does not own this small plot of land. The cemetery was cleaned up in 2003. It had a 4 foot high chain link fence around the known family graves in the cemetery. In witching the area around this site we believe that there are several unmarked slave burials just outside the fenced area. There are several generation of folks buried at this site. One of the ladies was a daughter of Samuel Hoy (Samuel Hoy Cemetery) this cemetery is clearly marked with a metal marker showing the cemetery name. While there are spaces available for additional graves it is not anticipated that any new graves will be added to this cemetery. For addition information on this site see the documents on the 2007 Lawsuit. This cemetery is located half in section 20 and half in section 29 of Twn 52N, Range 34 W. Platte County.

There is a Small Family Cemetery located in the east half of section 33, Twn 52, Range 34, Platte County, I have not been to this cemetery. I understand that there are two stone posts at the entrance to the burial ground and that there are several tombstone at this site. Since it was not part of the suit in 2007 I had no reason to ventur to this cemetery which sets a stong ¼ mile off the gravel road.

The Hampton Cemetery is a public Cemetery that is open and used today. It is not owned by KCI. It is located in the SE ¼ of section 29, Twownship 52, range 34, Platte County. This public Cemetery is mentioned since the KCI or MCI Air port folks have purchased a number of grave sites to relocated the graves stones from the Hughes Family Buirial Grounds and the Winston Family burial Gounds.. the name now shown on this cemetery is therefore the Hampton-Hughes-Winston Cemetery. (Hughes Family Cemetery) (Winston Family Cemetery).

Thhe Miller-Rixey Cemetery. Is located on 1 acre of land in the NW ¼ of section33, Township 52, Range 34, Platte County. This Family Burial ground was set aside in the will of Jesse Miller. When the land was sold from this family the title search shown that 159 acres were sold. At the time the City purchased the land an error was made in reading the title documents. The property clearly shows has containing only 159 acres. However KCI thinks that they bought the entire ¼ section which they did not. The Platte County assessors office clearly shows this Cemetery as a separate tract of land. The cemetery has its own trust and is currently managed by Olin Miller and Norton Rixey. This cemetery was fenced sometime in the early 1940'd prior to the land being sold. There are 27 identified graves. There are also approximately 25 negro slave graves at this site. The slave graves which were not originally marked are located both inside and outside the fence. Some year back KCI in an effort to bring the land up to meeting federal land drainage had the property terraced. At this time they removed dirt from over several of the negro slave gravesites. Therefore several of the graves are very shallow. This cemetery was part of the site That Jimmy Johnston wrote his historic review on. This paper is available from the State of Missouri Historical records. My father and I have walked this site several times. After Jimmy Johnsons death we finally pieced together his roots. As mentioned above Mrs Jesse Miller was Margaret Jones. She married Lewis M. Waller Sr. in Virginia. The couple came west and lived in Clay Count. They had a son Lewis M. Waller Jr. both father and son died in 1841 and are buried in the Gladsone MO area. One grave is marked in that location with a stone. Margaret then moved in with her parents and lived with them until the she married in 1848 to Jesse Miller. She had a single daughter by Jesse Miller. The family had acquired the large home of theYates Family. Some of the family negro slaves lived in the basement while others lived in two log cabin sites near the home*See Jimmy Johnston report). The Miller Daught married Wellington Rixey. She had a child who died in the birth process. The mother also died at the same time. Mr Rixey remarried and continued to live with his inlaws. Wills leave the property to him. Relatives of the Jones family and also several other families from the Hampton Commumity are buried in this cemetery. This is an active cemetery The cemetery has a modern granite marker that identifies the Miller=Rixey Cemetery. (Daniel Jones Cemetery.).

Samuel HoyFamily Cemetery - this site is located in the NW ¼ of section 34, Township 52, Range 34 w. Platte County. When this cemetery was identified for the KCI folks a drew was sent in to clean the area with a dozer or bobcat. They did not realize that the stone turned up on end were there to mark graves. Only 8 of these stones remain today. There is a part of the tombstone for Mr Samuel Hoy left. However, we hve a full copy of the wording that was on this stone.l this cemeter was never fenced. In addition to Samuel Hoy and his wife and a baby child we have located over 50 unmarked graves in 4 rows at this site. The cemetery is marked by a granite marker. This site was along the edge of the old road that ran thru the property. The old road fence is still visibable along the west edge of the cemetery site. Samuel Hoy was the oldest son of Jones Hoy. Jones Hoy had several children most of whom lived to the south of the airport. (Brightwell Cemetery ^ Pemberton Cooper Cemetery, and Kimsey Cemetery and William Hoy Cemetery).

Kimsey Cemetery - The Airport had this farmland starting in the late 1980's. They gave the farmer permission to remove the tombstone stones and farm over the site. Today there is a single stone remaining leaning against aa treet at the top of the rise in the field. This tree and stone set to the west edge of the cemetery site. We have some of the names of the Kimsey family buried at this location taken from books published in the 1960's while the cemetery was still standing. It is thought that there are probably several negro slave graves at this site. Family tradition has it that the red granite rock had bee used for these head stones and that the two initals of the person had been scratched into the stone. The Mrs Kimsey was a sister to Samuel Hoy and William Hoy. Little or no work has been done to tract this cemetery back since it was destroyed in the 1980's. Shirly Kimsey has been the relative handling the affairs of this site. No future burials will be made at this site. This "Cemetery is located SE ¼ of Section 32, Township 42, range 34, Platte County, MO.

The William Hoy Cemetery - Was located on property in the NW ¼ of section 3 Township 51N, Range 34 w,Platte county, MO. This cemetery was originally part of the 2007 Lawsuit. However the court forced the KCI Airport to remove the cemetery from the suit when evidence of a title and copy of the sale contract from the Hoy family to the KCI Airport was presented. This small cemetery sets insite a stone wall. We believe that there are a couple of slave graves that maybe located outside the stone wall. This cemetery is maintained by Doug Bogart. William Hoy was the younger brother of Samuel Hoy and a sister of Mrs Kimsey. As the child of Jones Hoy he is related to many other folks lifing in the area today.

The Rush Creek Church Cemetery. This cemetery is located on land that is currently managed by the KCI Parks and Recreation Department. It is located in the NE ¼ of section 4 Township51, Range 34, Platte County. This old church was trn down in the depression to help pay debts. A partical record of the burials can be found at the Platte County Historical Society. It is also listed in several of the cemetery record books in the County files. While the KCI Airport says that they are not responsible for this land it is still owned by Kansas City MO. Since it is blocked off by the same roadway gates that barricade the KCI Airport facility I am including it in this reportr. This cemetery is along the west edge of the old road. When the road was graded in years past erosion has caused several of the graves closest to the road to be exposed and open to public view. The cemetery has not been maintained in over 40 years. At present there is work being done to get a boy scout to do his Eagle Scout project to clean up the cemetery. Once this has been done MO Western District Gudge Gary Witt has agreed to help install a fence around the cemetery.

Hughes Family Cemetery - Back in the late 1950's when land was purchased for the MCI Airport

and TWA Overhaul bace the land was leveled to allow for the east-west runway. An effort was made at that thime to move the tombstone that were visible on the hilltop. These stone were moved to the Hampton Cemetery as mentioned above. Locals tell me that a box of dirt was moved from the top of each grave nand reburied with the stone at the Hampton cemetery. NO effort was made to remove the human remains of the family buried here. Based oon information from George D. Offutt who grew up at the Hampton Community and from an old 1950's topographical mao I believe the Hughes family home site and cemetery was located on north edge of SE ¼ of section 28, Township 52m Range 34, Platte County, MO This cemetery set on one hilltop. On the next hilltop was the Hughes Family Negro Slave Cemetery. At the time that the land was leveled in the late 1950's NO effort was made to do anything to protect or even attempot to move this cemetery. As you can see from the work of Dawn Stricklin the Hughes family owned the largest holding of slaves in southern Platte County MO. When you look at the Hughes family it was a Father, tow sons and a daughter all owning slaves and living in the same general area. On the reports of Dawn Stricklin there are reference to the Hughes family owning much of the land where the KCI Airport Facility is located today. Given that this was a family operation and that they only had the one family cemetery it is believed that this ws the only cemetery located on the various ¼ section owned by the Hughes father and sons. I have told many folks that if they stand in the middle of terminal B looking south across the Tarmack and E-W Runnway they are looking for the burial site for over 100 slaves. Given the laws from the 1950's there is nothing that can be done to restore this burial site for either the Hughes Family or the Hughes Slaves. A Plack or memorial tablet mounted at the Airport Terminal would be the only way to honor these individuals.

Winston Family Cemetery - This cemetery was not moved until the early to mid 1980's. It was also moved to the Hampton Cemetery. In this case the tombstone were also moved to the new location with a box of dirt. The family has told me that they failed to move a grave or two of children that were not marked. I do not consider the damage to this cemetery to be anything like the Hughes family Cemetery since the graves were all covered with 20 plus feet of dirt. So in effect this cemetery and the related slave graves have only been covered over and are no longer accessable to family members.. Here again a plack or memorial of some sort will be nice to honor the folks buried at the south end of the second N/S runway. (See Hughes Family Cemetery)

Dobson Family Cemetery = I have been told that the Dobson Family had a cemetery located beteween the Samuel Hoy Cemetery and the Hughes Family Cemetery. The exact location of this site is not known to me

There is also a single grave located along the very south edge of the property acquired by the airport. The exact location of this family site is in section NE1/4 of section 3, township 51, Range 34, Platte Coutny. This burial site is probably on the south high bank of the Rush Creek area.

Also located to the north of the Samuel Hoy Cemetery and to the south of the old 104th street gravel road bed are two home sites that have been shown to me. They are both sites of loge homes. All that remain at each site is the stone foundation and well site. These set off in the tree line and are not affected by the pasture land near them. These sites are fine for cattle bur both have open wells .

I apologize for all typing errors in this document. Given my partical blindness I am not able to proof read the information. So Please call me if you have questions. I hope this is of help to you in reviewing the lands around the KCI airmrt
Sincerely,

Olin L. Miller
olin@jblbinsurance.com
Olin Miller Insurance
A Division of MB & Associates, LLC
Phone (816) 858-3000
Fax (816) 858-3798

The greatest gift you can offer me is the referral of a friend. Thank you for allowing me to serve you!!!!

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Account #	Ad Number	Identification	PO	Amount	Cols	Lines
654228	0003812867	NOTICE OF AVAILABLITY OF DRAFT ENVIRON		$1,272.60	3	69

Attention:

LANDRUM & BROWN
11279 CORNELL PARK DRIVE
CINCINNATI, OH 45242

NOTICE OF AVAILABLITY OF DRAFT ENVIRONMENTAL ASSESSMENTAND SECTION 106 REVIEW AND NOTICE OF PUBLIC HEARING FOR THE KANSAS CITY INTERNATIONAL AIRPORT TERMINAL REPLACEMENT PROJECT, KANSAS CITY, MISSOURI

The City of Kansas City, Missouri Aviation Department (KCAD) is issuing this notice to announce the availability of the Draft Environmental Assessment (EA)andSection 106 evaluation for the Proposed Replacement Terminal Projectat Kansas City International Airport.

The City of Kansas City, Missouriand KCAD propose the development of a replacement terminal and other associated projects. The proposed action includes the construction of a replacement terminal at the existing Terminal A site and decommissioning and demolition of the existing terminals. The proposed action also includes construction of a new parking garage and surface parking lot, construction of various stormwater collection system improvements, replacement of the Central Utility Plant, and resurfacing and rehabilitation of the taxiways near the replacement terminal.

The draft document presents the purpose and need for the proposed action, analysis of reasonable alternatives, including the No Action alternative, discussion of environmental impacts for each reasonable alternative, and supporting appendices.The proposed action includesan adverse effect on the existing terminals, which are eligible for listing on the National Register of Historic Properties. This adverse effect also results in a physical use under Section 4(f) of the Department of Transportation Act of 1966 that is evaluatedin a separate Section 4(f) Statement that will be posted for notice and comment.The adverse effect is being mitigated through a Memorandum of Agreement (MOA) per Section 106 of the National Historic Preservation Act (NHPA).

The draft document is available for public review online athttp://FLYKCI.com and at http://www.kci-edgemoor.com.The draft document is also available at the following locations during normal business hours.

- Mid-Continent Library Boardwalk Branch, 8656 N. Ambassador Drive, Kansas City, MO 64154
- Mid-Continent Library , Platte City Branch, 2702 Prairie View Road, Platte City, MO 64079
- Mid-Continent Library , Parkville Branch, 8815 Tom Watson Parkway, Parkville, MO 64152
- Federal Aviation Administration, Central Region Airports Division, 901 Locust St., Room 364, Kansas City, MO 64106-2325
- City of Kansas City, Aviation Department, 601 Brasilia Ave., Kansas City, MO 64153

The public comment period starts on August 23, 2018 and ends on October2, 2018. As part of the public participation process, KCAD will hold a public workshop and hearing from 6:00 p.m. to 8:00 p.m. on Monday, September24, 2018 at the Ambassador Building, 12200 N. Ambassador Dr., Kansas City, Missouri.Oral and written comments may be presented at the hearing. Written comments may also be submitted to the following address:

Chris Babb
Landrum & Brown
11279 Cornell Park Drive
Cincinnati, OH 45242
Or by email to KCIEAcomments@landrum-brown.com

All comments must be accepted no later than 5:00 p.m. Central Time, Monday, October 2, 2018.

All interested parties are encouraged to provide comments concerning the scope and content of the draft document. Comments should be as specific as possible and address the analysis of potential environmental impacts and the adequacy for the proposed action or merits of its alternatives and the mitigation being considered.Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment –including your personal identifying information–maybe made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

For further information, contact: Mr. Scott Toner, P.E., Federal Aviation Administration, Central Region-Airports Division, ACE-600., Room 364, 901 Locust St., Kansas City, Missouri 64106-2325 Telephone: 816-329-2639.

THE STATE OF TEXAS

County of Tarrant

I, Christine Lopez,

make oath and swear that

CYPRESS MEDIA, LLC, publishers of The Kansas City Star, all it's neighborhood sections and suburban newspapers including 816, 913, Johnson County News, Northland and its subsidiaries, The Olathe News, The Cass County Democrat-Missourian and The Lee's Summit Journal, are published in the Kansas City, Missouri, metro (distribution) area including but not exclusively to Johnson and Wyandotte Counties in the state of Kansas, and Cass, Clay, Jackson and Platte Counties in the state of Missouri. Every publication listed is published weekly, twice weekly or daily. We confirm the notice ran the days scheduled in this statement. A true copy of which is hereto attached was duly published in The Kansas City Star.

FOR THE PERIOD OF: **1 day(s)**

COMMENCING: **08/23/2018**

ENDING: **08/23/2018**

EDITION(S):
08/23/2018

DEBORAH JEAN BAYLOR
Notary Public, State of Texas
Comm. Expires 10-29-2019
Notary ID 13042344-2

Subscribed and sworn to before me, this 27th day of August in the year of 2018.

My commission expires

Deborah Baylor - Notary

THE KANSAS CITY STAR.
MEDIA COMPANY
1601 McGee Street • Kansas City, MO 64108

The Kansas City Star
KansasCity.com
Customized Digital Solutions
Cars.com
The Lee's Summit Journal
The Cass County Democrat
The Olathe Daily News

Star Savings
Kansas City Spaces magazine
InkKC.com
Middle of the Map
KC Weddings magazine
KC Weddings Bridal Spectacular

AFFIDAVIT OF PUBLICATION

Account #	Ad Number	Identification	PO	Amount	Cols	Lines
654228	0003812891			$1,140.00	3	43

Attention: Chris Babb

LANDRUM & BROWN
11279 CORNELL PARK DRIVE
CINCINNATI, OH 45242

THE STATE OF TEXAS

County of Tarrant

I, Christine Lopez,

make oath and swear that

CYPRESS MEDIA, LLC, publishers of The Kansas City Star, all it's neighborhood sections and suburban newspapers including 816, 913, Johnson County News, Northland and its subsidiaries, The Olathe News, The Cass County Democrat-Missourian and The Lee's Summit Journal, are published in the Kansas City, Missouri, metro (distribution) area including but not exclusively to Johnson and Wyandotte Counties in the state of Kansas, and Cass, Clay, Jackson and Platte Counties in the state of Missouri. Every publication listed is published weekly, twice weekly or daily. We confirm the notice ran the days scheduled in this statement. A true copy of which is hereto attached was duly published in The Kansas City Star.

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EDITION(S):
08/23/2018

DEBORAH JEAN BAYLOR
Notary Public, State of Texas
Comm. Expires 10-29-2019
Notary ID 13042344-2

Subscribed and sworn to before me, this 31st day of August in the year of 2018.

My commission expires

Deborah Baylor - Notary

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THE KANSAS CITY STAR.
MEDIA COMPANY
1601 McGee Street • Kansas City, MO 64108

The Kansas City Star
KansasCity.com
Customized Digital Solutions
Cars.com
The Lee's Summit Journal
The Cass County Democrat
The Olathe Daily News
Star Savings
Kansas City Spaces magazine
InkKC.com
Middle of the Map
KC Weddings magazine
KC Weddings Bridal Spectacular

AFFIDAVIT OF PUBLICATION

Account #	Ad Number	Identification	PO	Amount	Cols	Lines
654228	0003842928	NOTICE OF AVAILABLITY OF DRAFT SECTION		$1,317.96	3	42

Attention:

LANDRUM & BROWN
11279 CORNELL PARK DRIVE
CINCINNATI, OH 45242

NOTICE OF AVAILABLITY OF DRAFT SECTION 4(f) STATEMENTFOR THE KANSAS CITY INTERNATIONAL AIRPORT TERMINAL REPLACEMENT PROJECT, KANSAS CITY, MISSOURI

The City of Kansas City, Missouri Aviation Department (KCAD) is issuing this notice to announce the availability of the Draft Section 4(f)Statement for the Proposed Replacement Terminal Projectat Kansas City International Airport. The City of Kansas City, Missouriand KCAD propose the development of a replacement terminal and other associated projects. The proposed action includesan adverse effect on the existing terminals, which are eligible for listing on the National Register of Historic Properties. This adverse effect results in a physical use under Section 4(f) of the Department of Transportation Act of 1966.The adverse effect is being mitigated through anAgreement per Section 106 of the National Historic Preservation Act (NHPA).

The draft document is available for public review online athttp://FLYKCI.com and at http://www.kci-edgemoor.com.The draft document is also available at the following locations during normal business hours.

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- Mid-Continent Library , Parkville Branch, 8815 Tom Watson Parkway, Parkville, MO 64152
- Federal Aviation Administration, Central Region Airports Division, 901 Locust St., Room 364, Kansas City, MO 64106-2325
- City of Kansas City, Aviation Department, 601 Brasilia Ave., Kansas City, MO 64153

The public comment period starts on September 10, 2018 and ends on October10, 2018. All comments must be accepted no later than 5:00 p.m. Central Time, Monday, October 10, 2018. Written comments may be submitted to the following address:

Chris Babb
Landrum & Brown
11279 Cornell Park Drive
Cincinnati, OH 45242
Or by email to KCIEAcomments@landrum-brown.com

For further information, contact: Mr. Scott Tener, P.E., Federal Aviation Administration, Central Region-Airports Division, ACE-600., Room 364, 901 Locust St., Kansas City, Missouri 64106-2325 Telephone: 816-329-2639.

THE STATE OF TEXAS

County of Tarrant

I, Christine Lopez,

make oath and swear that

CYPRESS MEDIA, LLC, publishers of The Kansas City Star, all it's neighborhood sections and suburban newspapers including 816, 913, Johnson County News, Northland and its subsidiaries, The Olathe News, The Cass County Democrat-Missourian and The Lee's Summit Journal, are published in the Kansas City, Missouri, metro (distribution) area including but not exclusively to Johnson and Wyandotte Counties in the state of Kansas, and Cass, Clay, Jackson and Platte Counties in the state of Missouri. Every publication listed is published weekly, twice weekly or daily. We confirm the notice ran the days scheduled in this statement. A true copy of which is hereto attached was duly published in The Kansas City Star.

FOR THE PERIOD OF: **1 day(s)**

COMMENCING: **09/10/2018**

ENDING: **09/10/2018**

EDITION(S):
09/10/2018

DEBORAH JEAN BAYLOR
Notary Public, State of Texas
Comm. Expires 10-29-2019
Notary ID 13042344-2

Subscribed and sworn to before me, this 10th day of September in the year of 2018.

My commission expires

Deborah Baylor - Notary

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KANSAS CITY INTERNATIONAL AIRPORT

PUBLIC HEARING

September 24, 2018
6:00 P.M. to 8:00 P.M.
Ambassador Building

SIGN-IN FORM

NAME (PLEASE PRINT)	ADDRESS	PHONE NUMBER (INCLUDE AREA CODE)
[illegible]	Box 800 Platte City MO	816-665-3304
Alicia Stephens	11724 NW Plaza Circle KCMO	816-270-2109
BOB WILLIAMS	1100 NW 108th CT KCMO	~~[illegible]~~ 303/910-1642
Justin Meyer	2317 NE 11th St KCMO	816.522.2719
Amanda Davis	846 New York St Lawrence, KS	(785)550-4848
Tom KENTON	533 MEXICO CITY, KCM	202-207-4416
Velda Cook	3437 Quincy Ave	816 868.5392
Sandra Rayford	10545 Washington, Apt 111	(816)682-1084

KANSAS CITY INTERNATIONAL AIRPORT

PUBLIC HEARING

September 24, 2018
6:00 P.M. to 8:00 P.M.
Ambassador Building

SIGN-IN FORM

NAME (PLEASE PRINT)	ADDRESS	PHONE NUMBER (INCLUDE AREA CODE)
WARREN WATKINS Jr.	4738 Norton Circle	816-547-9905
Linda WATKINS	"	816 305-2288
Gunnar Hand	533 Mexico City Ave	816-915-6304
Shirley Kimsey	16035 N. Winan	816-808-1172
DAN MOYLAN	SHAWNEE, KS	913-202-2675
Ginny Dobesh	600 W. 64th St. KCMO	617.501.3291
Brad Wolf	414 E. 12th St 16th Floor	816-513-2901
Ethel Fleming	1803 NW 92nd TERR	
Marshall Frey	533 Mexico City, KCMO 64153	281-386-7556
FRANK OFFUTT	14400 NW 104th ST. KCMO	816-881-7476

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KANSAS CITY INTERNATIONAL AIRPORT

PUBLIC HEARING

September 24, 2018
6:00 P.M. to 8:00 P.M.
Ambassador Building

SIGN-IN FORM

NAME (PLEASE PRINT)	ADDRESS	PHONE NUMBER (INCLUDE AREA CODE)
[illegible]	12413 [illegible]	326-7117
Daisy L. Young	12413 Newton Court	816-326-7117
[illegible]	2113 E 26th Terrace Lawrence, KS	785-841-4745
Diane G. Evans	533 Mexico City Ave	202 4419486
Bruce Watkins	2625 W. Pasco #403	816-249-8339
Ike Francis	10332 Hillcrest Rd KCMO	816 377-8069
Cora D. Thompson	1100 West St. Parkville, MO	816 9829869
A. Pearl Spencer	1100 West St. Parkville MO	———
Rick E. Abel, KC Globe	P.O. Box 481212, KCMO	816-516-2652
Janice Prezwodek	8604 N. Troost Ave, KCMO	(816)468-1334

Welcome to the Public Hearing for the Draft Environmental Assessment, Section 106 Evaluation, and Section 4(f) Statement

Proposed Replacement Terminal Project

at Kansas City International Airport

What is an Environmental Assessment?

An Environmental Assessment (EA) is a concise document used to describe a proposed action's anticipated environmental impacts.

The National Environmental Policy Act of 1969 (NEPA) and FAA Orders 5050.4B/1050.1F require all major Federal actions (including FAA actions) to be environmentally reviewed.

An Environmental Assessment:

- Discloses impacts and identifies if there are any that would result from the implementation of the Proposed Action.
- Provides sufficient evidence and analysis for a Federal determination of whether to prepare an Environmental Impact Statement (EIS) or issue a Finding of No Significant Impact (FONSI).
- Requires coordination with local, state, and Federal regulatory agencies.

Environmental Impact Categories

- Air Quality
- Biological Resources
- Climate
- Coastal Resources
- Department of Transportation Act, Section 4(f)
- Farmlands
- Hazardous Materials, Solid Waste, and Pollution Prevention
- Historical, Architectural, Archeological, and Cultural Resources
- Land Use
- Natural Resources and Energy Supply
- Noise and Noise-Compatible Land Use
- Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks
- Visual Effects (including light emissions)
- Water Resources (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers)
- Cumulative Impacts

Source: FAA Order 1050.1F, Environmental Impacts: Policies and Procedures

Environmental Assessment Process

Proposed Action

- Demolish existing Terminal A, including the Terminal A parking garage and aircraft apron;

- Construct a new replacement terminal (initial build to 39 gates, future 42 gates) and provide updated utilities including water lines

- Construct a new parking garage and surface parking lot

- Construct new terminal apron area around the replacement terminal including providing new fuel hydrants

- Modify existing roadways and construct new roadways in the terminal area

- Construct various storm water collection system improvements including improved glycol recovery system (deicing) and facilities

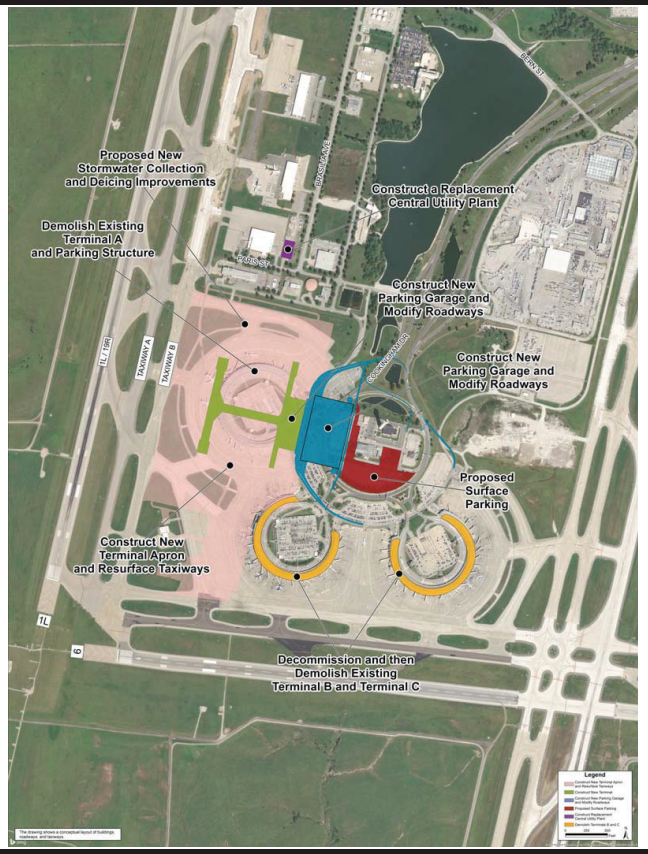
- Construct replacement Central Utility Plant (CUP) and provide redundant electrical underground electrical power utility feed

- Resurface and rehabilitate the taxiways in the vicinity of the replacement terminal

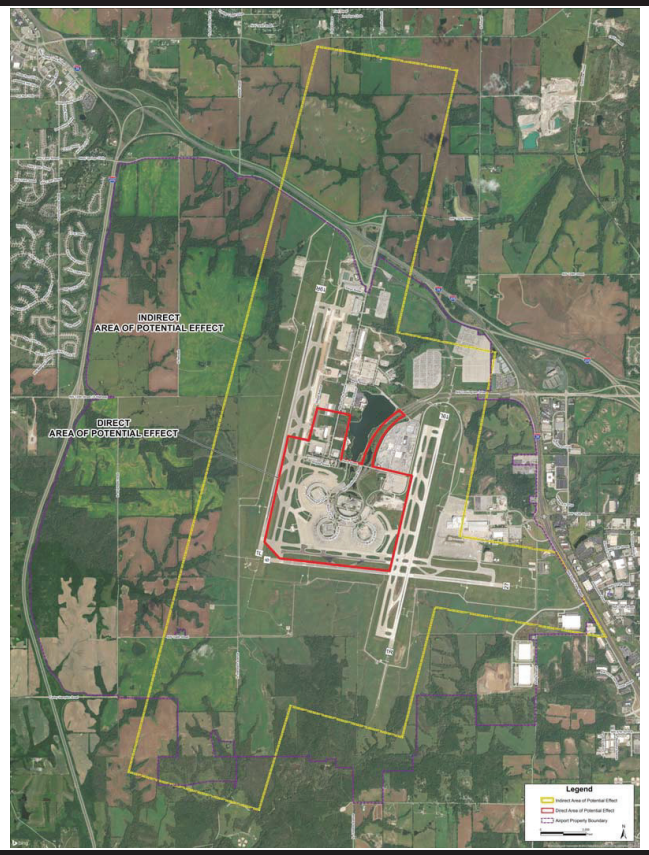
- Decommission and demolish existing Terminal B and Terminal C and consolidate airline operations at the new replacement terminal (Terminal B and C would remain open during construction of the new terminal).

- The Proposed Action is anticipated to provide 39 gates upon opening with potential future expansion to 42 gates. Therefore, the Proposed Action would have less gates than that of the existing Terminals A, B, and C. The Proposed Action would occur completely on Airport-owned property and would not include any highway or rail improvements. The Terminal B and C demolition sites would remain vacant with appropriate ground cover. The Terminal B and C parking lots would remain operational for employee parking and/or customer parking. A new security fence would be constructed to divide the parking areas from the airport operations areas.

Proposed Action



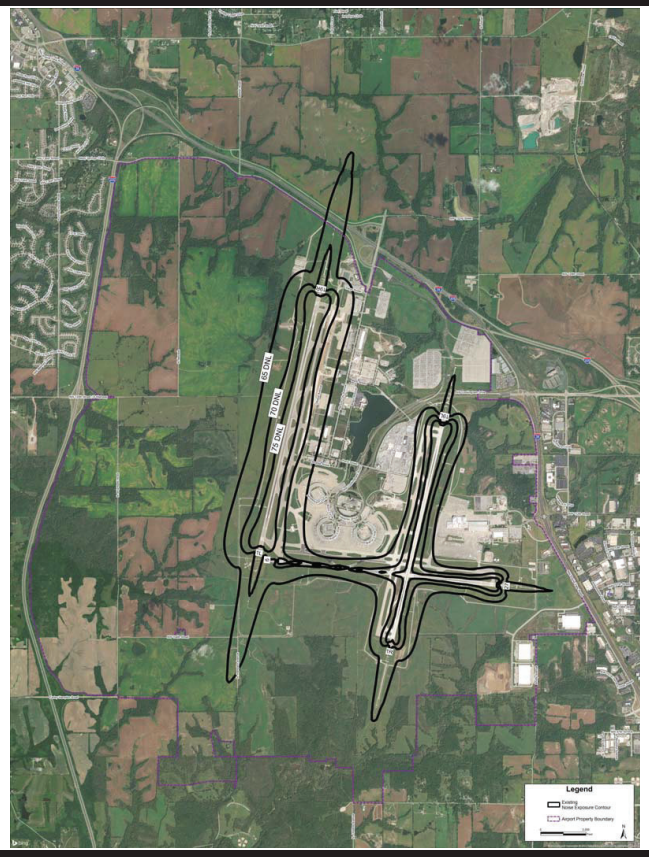
Areas of Potential Effects for Direct and Indirect Impacts



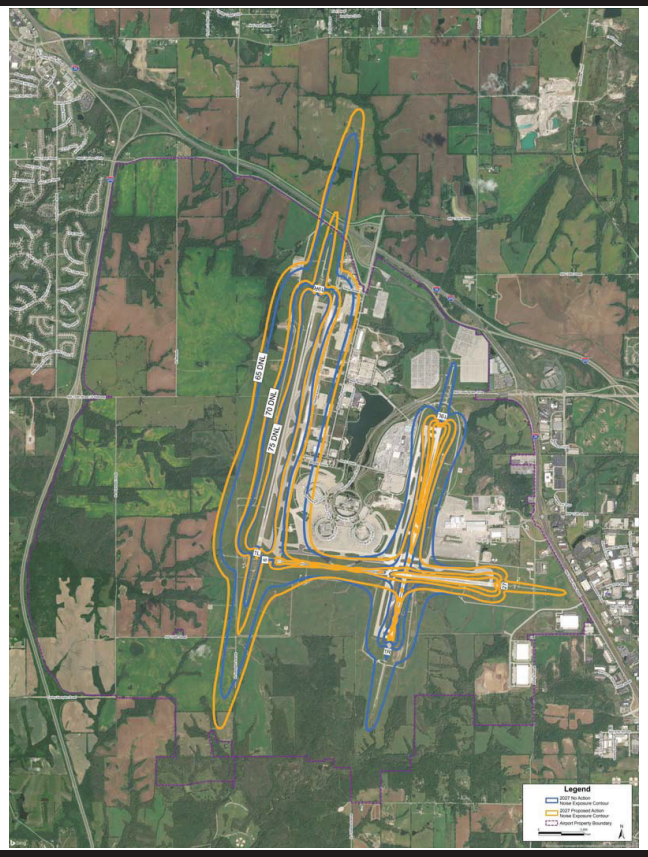
Public Hearing Protocol

1. The purpose of the public hearing is to give all interested people the opportunity to give their comments on the environmental assessment.
2. People wishing to make comments can do so by writing their comments on a form or making an oral statement to the court reporter.
3. People wanting to have their comments taken by the court reporter must register at the sign-in table. Please be courteous and respect the rights of all commenters.
4. Each commenter will be allowed 3 minutes with the court reporter.
5. People desiring more time may register to speak again with the court reporter. They will be given another opportunity to speak after all other registered commenters have had their chance.
6. You may either complete the forms today and leave them in the Comment Box or take them with you and mail them to the indicated address. All comments must be received by October 2, 2018.
7. You may also email your comments to KCIEAcomments@landrum-brown.com

Existing
Noise Exposure Contour



Future (2027) No Action Noise Exposure Contour
Compared to
Future (2027) Proposed Action Noise Exposure Contour



Archeological and Cultural Resource Survey Locations



Visual Effects Viewshed Analysis



Summary of Impacts

Environmental Consequences Impact Category	Proposed Action		No Action Alternative	
	Impacts	Mitigation	Impacts	Mitigation
Noise and Compatible Land Use	No Noise Sensitive Facilities within DNL 65+ dB	None required	No Noise Sensitive Facilities within DNL 65+ dB	None
Socioeconomic, Environmental Justice, & Children's Health	Not significant. Would result in a socioeconomic benefit from construction jobs	None required	None	None
Visual Effects	None	None required	None	None
Water Resources				
Wetlands	No Impact	Implement Best Management Practices during Construction Activities to avoid wetland resources	None	None
Floodplains	Not Significant	Implement Best Management Practices during Construction Activities to limit runoff and erosion	None	None
Surface Water	Not Significant	Implement Best Management Practices during Construction Activities to limit runoff and erosion. Ensure the Airport operates in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit number MO-0114812 issued by the Missouri Department of Natural Resources (MDNR)	None	None
Ground Water	No Impact	None required	None	None
Wild and Scenic Rivers	None	None required	None	None
Cumulative Impacts	Not Significant	None required	None	None

Summary of Impacts

Environmental Consequences Impact Category	Proposed Action		No Action Alternative	
	Impacts	Mitigation	Impacts	Mitigation
Air Quality	No significant impact. Would Not Exceed National Ambient Air Quality Standards or cause in increase in emissions above applicable federal *de minimis* thresholds as demonstrated in the General Conformity evaluation.	Implement Best Management Practices during Construction Activities to reduce fugitive dust emissions	No significant impact. Would Not Exceed National Ambient Air Quality Standards	None
Biological Resources	No Impact	None required	None	None
Climate	No Adverse Impact	None required	No Adverse Impact	None
Coastal Resources	None	None required	None	None
Section 4(f)	Physical Use impact to Terminals A, B, and C considered eligible to the NRHP	Develop a Memorandum of Agreement to resolve adverse effects	None	None
Farmlands	None	None required	None	None
Hazardous Materials, Solid Waste, & Pollution Prevention	No significant impact	Arrange for the transportation and disposal of all hazardous materials including asbestos associated with the demolition of the Terminals in accordance with Federal, state, and other applicable regulations	None	None
Historical, Architectural, Archeological, and Cultural Resources	Adverse impact to Terminals A, B, and C considered eligible to the NRHP	Develop a Memorandum of Agreement to resolve adverse effects	None	None
Land Use	None	None required	None	None
Natural Resources and Energy Supply	No Adverse Impact	Recycle and reuse existing materials and implement sustainable construction, building, and operational measures where reasonable and practicable	None	None

Potential Impacts

The Federal Aviation Administration and the Missouri State Historic Preservation Office have determined that Terminals A, B, and C are eligible for listing in the National Register of Historic Places under Criteria A and C.

The Proposed Action includes the demolition of the existing terminals and would result in an adverse effect under Section 106 and a physical use under Section 4(f).

A Programmatic Agreement is being developed to include mitigation measures to address the demolition of the terminals.

- Measures to address the historic and architectural significance of the terminals.

- Mitigation also includes preparing an Archeological Monitoring Plan and an Unanticipated Discoveries Plan to address unknown resources that may be encountered during construction.

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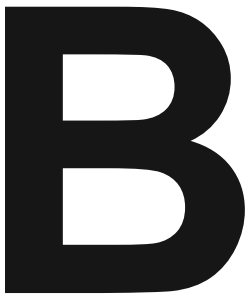
Kansas City International Airport
Environmental Assessment, Section 106 Evaluation, and
Section 4(f) Statement

Appendix B



Appendix B AEDT Modeling Methodology

B.1 Air Quality

B.1.1 Aircraft Activity Levels and Fleet Mix

The number and type of aircraft operations directly affects emissions. **Table B-1** provides the aircraft operations for the Existing Conditions.

Table B-1 Total Aircraft Operations Existing Conditions

Aircraft	Engine Model	Annual Operations
Boeing 737-300 Series	CFM56-3-B1	6049.0
Raytheon Beech 1900-D	PT6A-67D	209.9
Boeing 717-200 Series	BR700-715C1-30	4029.3
Boeing 737-400 Series	CFM56-3C-1 (Rerated)	580.7
Boeing 737-700 Series	CFM56-7B24	38340.4
Boeing 737-800 Series	CFM56-7B26/2	14161.4
Boeing 757-200 Series	PW2037	1249.5
Boeing 757-200 Series	RB211-535E4B	1815.0
Airbus A300F4-600 Series	PW4x58	1270.8
Airbus A319-100 Series	V2522-A5	6669.3
Airbus A320-200 Series	CFM56-5-A1	6382.5
Airbus A321-200 Series	V2530-A5	705.3
Raytheon Beech Baron 58	TIO-540-J2B2	55.0
Bombardier Challenger 600	ALF 502L-2	766.0
Bombardier Challenger 601	CF34-3A	3770.7
Cessna 172 Skyhawk	TSIO-360C	77.6
Cessna 208 Caravan	PT6A-114	260.2
Cessna 525 CitationJet	PW4090	166.8
Cessna 550 Citation II	PW530	278.1
Cessna 560 Citation V	JT15D-5C	346.2
Cessna 560 Citation XLS	BIZMEDIUMJET_F	1047.6
Bombardier CRJ-900	CF34-8C5A1	10848.6
Boeing DC-10-10 Series	CF6-6D	547.2
DeHavilland DHC-6-200 Twin Otter	PT6A-27	120.5
Embraer ERJ145	AE3007A1/1	1621.7
Embraer ERJ170-LR	CF34-10E5A1	2916.6
Embraer ERJ175	CF34-8E5	11376.5

Aircraft	Engine Model	Annual Operations
Embraer ERJ190	CF34-10E6A1	243.2
Piper PA-24 Comanche	TIO-540-J2B2	114.4
Bombardier Learjet 35A/36A (C-21A)	TFE731-2/2A	189.3
Boeing MD-11	PW4460	137.8
Boeing MD-82	JT8D-217A	537.1
Boeing MD-83	JT8D-219	4817.8
Boeing MD-90	V2525-D5	1654.9
Total Annual Operations		**123,357.0**

Table B-2 provides the aircraft operations for the 2022.

Table B-2 2022 Total Aircraft Operations

Aircraft	Engine Model	Annual Operations
Raytheon Beech 1900-D	PT6A-67D	195.4
Boeing 717-200 Series	BR700-715C1-30	5132.3
Boeing 737-400 Series	CFM56-3C-1 (Rerated)	739.6
Boeing 737-700 Series	CFM56-7B24	48835.5
Boeing 737-800 Series	CFM56-7B26/2	18037.9
Airbus A300F4-600 Series	PW4x58	1618.7
Airbus A319-100 Series	V2522-A5	8494.9
Airbus A320-200 Series	CFM56-5-A1	8129.6
Airbus A321-200 Series	V2530-A5	898.4
Raytheon Beech Baron 58	TIO-540-J2B2	52.4
Bombardier Challenger 600	ALF 502L-2	713.1
Bombardier Challenger 601	CF34-3A	3510.6
Cessna 172 Skyhawk	TSIO-360C	73.9
Cessna 208 Caravan	PT6A-114	247.8
Cessna 525 CitationJet	PW4090	155.3
Cessna 550 Citation II	PW530	258.9
Cessna 560 Citation V	JT15D-5C	322.3
Cessna 560 Citation XLS	BIZMEDIUMJET_F	975.3
Bombardier CRJ-900	CF34-8C5A1	13818.2
Boeing DC-10-10 Series	CF6-6D	697.0
DeHavilland DHC-6-200 Twin Otter	PT6A-27	114.7
Embraer ERJ170-LR	CF34-10E5A1	3715.0
Embraer ERJ175	CF34-8E5	14490.7
Embraer ERJ190	CF34-10E6A1	309.8
Piper PA-24 Comanche	TIO-540-J2B2	109.0
Bombardier Learjet 35A/36A (C-21A)	TFE731-2/2A	180.2
Boeing MD-11	PW4460	175.6
Boeing MD-90	V2525-D5	2107.9
Total Annual Operations		**134,110.0**

Table B-3 provides the aircraft operations for the 2027.

Table B-3 2027 Total Aircraft Operations

Aircraft	Engine Model	Annual Operations
Raytheon Beech 1900-D	PT6A-67D	187.4
Boeing 717-200 Series	BR700-715C1-30	5681.9
Boeing 737-400 Series	CFM56-3C-1 (Rerated)	818.8
Boeing 737-700 Series	CFM56-7B24	54064.8
Boeing 737-800 Series	CFM56-7B26/2	19969.4
Airbus A300F4-600 Series	PW4x58	1792.0
Airbus A319-100 Series	V2522-A5	9404.5
Airbus A320-200 Series	CFM56-5-A1	9000.1
Airbus A321-200 Series	V2530-A5	994.6
Raytheon Beech Baron 58	TIO-540-J2B2	52.4
Bombardier Challenger 600	ALF 502L-2	683.8
Bombardier Challenger 601	CF34-3A	3366.3
Cessna 172 Skyhawk	TSIO-360C	73.9
Cessna 208 Caravan	PT6A-114	247.8
Cessna 525 CitationJet	PW4090	148.9
Cessna 550 Citation II	PW530	248.2
Cessna 560 Citation V	JT15D-5C	309.1
Cessna 560 Citation XLS	BIZMEDIUMJET_F	935.3
Bombardier CRJ-900	CF34-8C5A1	15297.8
Boeing DC-10-10 Series	CF6-6D	771.7
DeHavilland DHC-6-200 Twin Otter	PT6A-27	114.7
Embraer ERJ170-LR	CF34-10E5A1	4112.8
Embraer ERJ175	CF34-8E5	16042.4
Embraer ERJ190	CF34-10E6A1	343.0
Piper PA-24 Comanche	TIO-540-J2B2	109.0
Bombardier Learjet 35A/36A (C-21A)	TFE731-2/2A	180.2
Boeing MD-11	PW4460	194.3
Total Annual Operations		**145,145.0**

B.2 Noise

B.2.1 Aircraft Activity Levels and Fleet Mix

Table B-4 provides the number of average daily operations for air carriers, cargo, commuter/air taxi, and General Aviation operations at the Airport.

Table B-4 Summary of Average Daily Operations by Aircraft Category – Existing Conditions

	Air Carrier	Cargo	Commuter/ Air Taxi	General Aviation	Total
Number of Operations	302.81	10.28	22.47	2.22	**337.78**

Source: FAA, ATADS 2017.

Table B-5 shows the total number of operations by detailed aircraft type and by time of day (daytime or nighttime). The 2017 annual average day included 337.78 total operations, 15.4% of which occurred during the nighttime hours of 10:00 p.m. to 6:59 a.m.

Table B-5 Average Daily Operations by Aircraft Type – Existing Conditions

Aircraft Type	Arrivals		Departures		Total Operations
	Daytime	Nighttime	Daytime	Nighttime	
Air Carrier					
717200	4.65	0.87	4.76	0.75	11.03
737300	6.99	1.30	7.15	1.13	16.57
737400	0.67	0.12	0.68	0.11	1.58
737700	44.27	8.25	45.35	7.17	105.04
737800	16.35	3.05	16.75	2.65	38.80
757PW	1.44	0.27	1.47	0.23	3.42
A319-131	7.70	1.43	7.89	1.24	18.27
A320-211	7.37	1.37	7.55	1.19	17.48
A321-232	0.81	0.15	0.83	0.13	1.92
CRJ9-ER	12.53	2.33	12.83	2.03	29.72
EMB170	3.37	0.63	3.45	0.54	7.99
EMB175	13.14	2.45	13.46	2.13	31.17
EMB190	0.28	0.05	0.28	0.04	0.65
MD82	0.62	0.12	0.63	0.10	1.46
MD83	5.56	1.04	5.70	0.90	13.20
MD9025	1.91	0.36	1.95	0.31	4.53
Subtotal	**127.66**	**23.79**	**130.72**	**20.64**	**302.81**

Aircraft Type	Arrivals		Departures		Total Operations
	Daytime	Nighttime	Daytime	Nighttime	
Cargo					
757RR	0.89	1.60	1.06	1.42	4.96
A300-622R	0.62	1.12	0.74	0.99	3.47
DC1010	0.27	0.48	0.31	0.42	1.49
MD11PW	0.07	0.12	0.07	0.11	0.37
Subtotal	**1.85**	**3.32**	**2.18**	**2.93**	**10.28**
Commuter/Air Taxi					
1900D	0.28	0.01	0.27	0.01	0.57
CL600	1.02	0.03	0.99	0.06	2.10
CL601	5.01	0.15	4.87	0.30	10.33
CNA525C	0.22	0.01	0.21	0.01	0.45
CNA55B	0.37	0.01	0.36	0.02	0.76
CNA560U	0.46	0.01	0.45	0.03	0.95
CNA560XL	1.39	0.04	1.35	0.08	2.87
EMB145	2.16	0.06	2.09	0.13	4.44
Subtotal	**10.91**	**0.33**	**10.59**	**0.64**	**22.47**
General Aviation					
BEC58P	0.06	0.01	0.05	0.02	0.14
CNA172	0.09	0.01	0.08	0.03	0.21
CNA208	0.31	0.04	0.27	0.09	0.71
DHC6	0.14	0.02	0.13	0.04	0.33
GASEPV	0.14	0.02	0.12	0.04	0.31
LEAR35	0.23	0.03	0.20	0.06	0.52
Subtotal	**0.98**	**0.13**	**0.84**	**0.27**	**2.22**
Total	**141.39**	**27.56**	**144.34**	**24.49**	**337.78**

Notes: Daytime = 7:00 am – 9:59 pm, Nighttime = 10:00 pm – 6:59 am.
Source: FAA, ATADS.

B.2.2 Runway Definition

The following provides the length and width of the current runways at KCI used in AEDT.

Runway	Length (feet)	Width (feet)
09/27	9,501	150
01L/19R	10,801	150
01R/19L	9,500	150

B.2.3 Runway End Utilization

Runway use percentages modeled for the Existing Conditions Noise Contour are shown in **Table B-6**.

Table B-6 Runway Utilization – Existing Conditions

Aircraft Category	Runway End						
	09	27	01L	01R	19L	19R	Total
Daytime Arrivals							
Air Carrier	0.0%	13.7%	18.4%	15.8%	16.2%	35.9%	100.0%
Cargo	0.0%	25.7%	36.4%	3.0%	0.0%	34.9%	100.0%
Commuter/Air Taxi	0.0%	16.9%	24.4%	14.4%	18.1%	26.3%	100.0%
General Aviation	0.0%	16.7%	39.4%	4.5%	3.0%	36.5%	100.0%
Total	**0.0%**	**14.1%**	**19.3%**	**15.5%**	**16.0%**	**35.2%**	**100.0%**
Nighttime Arrivals							
Air Carrier	0.0%	10.8%	25.4%	15.0%	9.8%	39.1%	100.0%
Cargo	0.0%	14.4%	58.8%	1.0%	0.0%	25.8%	100.0%
Commuter/Air Taxi	0.0%	50.2%	49.8%	0.0%	0.0%	0.0%	100.0%
General Aviation	0.0%	7.2%	38.2%	0.0%	0.0%	54.7%	100.0%
Total	**0.0%**	**11.6%**	**29.8%**	**13.0%**	**8.4%**	**37.1%**	**100.0%**
Daytime Departures							
Air Carrier	0.6%	11.3%	27.5%	8.5%	19.4%	32.7%	100.0%
Cargo	0.0%	17.2%	45.8%	2.4%	1.2%	33.5%	100.0%
Commuter/Air Taxi	0.0%	11.8%	34.2%	7.9%	21.7%	24.3%	100.0%
General Aviation	1.5%	14.9%	41.9%	4.5%	1.5%	35.8%	100.0%
Total	**0.5%**	**11.5%**	**28.3%**	**8.4%**	**19.2%**	**32.1%**	**100.0%**
Nighttime Departures							
Air Carrier	1.5%	5.1%	32.7%	7.0%	22.7%	30.9%	100.0%
Cargo	1.2%	5.0%	61.3%	0.0%	0.0%	32.5%	100.0%
Commuter/Air Taxi	0.0%	12.5%	62.9%	0.0%	0.0%	24.6%	100.0%
General Aviation	0.0%	13.4%	43.4%	0.0%	0.0%	43.2%	100.0%
Total	**1.4%**	**5.4%**	**37.0%**	**5.9%**	**19.2%**	**31.1%**	**100.0%**

Source: FAA, 2018, Radar Data; Landrum & Brown, 2018.

B.2.4 Flight Tracks

The AEDT default weights were utilized for the dispersed subtracks.

B.2.5 Aircraft Trip Length and Operational Profiles

Where specific aircraft weights are unknown, the AEDT uses the distance flown to the first stop as a surrogate for the weight, by assuming that the weight has a direct relationship with the fuel load necessary to reach the first destination. The AEDT groups trip lengths into nine categories; these categories are:

Category	Stage Length[1]
1	0-500 nautical miles
2	500-1000 nautical miles
3	1000-1500 nautical miles
4	1500-2500 nautical miles
5	2500-3500 nautical miles
6	3500-4500 nautical miles
7	4500-5500 nautical miles
8	5500-6500 nautical miles
9	6500+ nautical miles

The trip lengths flown from KCI are based on scheduled operations. **Table B-7** indicates the proportion of the operations that fell within each of the nine trip length categories for the existing conditions.

Table B-7 Departure Trip Length Distribution – Existing Conditions

Stage Length	Air Carrier	Cargo	Commuter/Air Taxi	General Aviation
1	69.8%	97.3%	95.1%	100%
2	22.9%	1.9%	4.9%	-
3	7.2%	0.7%	< 0.0	-
4	-	< 0.0%	-	-
5	-	< 0.0%	-	-
6	-	< 0.0%	-	-
7	-	-	-	-
8	-	-	-	-
9	-	-	-	-

Source: Official Airline Guide; FAA, 2018, Radar Data; Landrum & Brown, 2018.

[1] Stage length is defined as the distance an aircraft travels from takeoff to landing.

Runway use percentages modeled for the Proposed Action Noise Contours are shown in **Table B-8**.

Table B-8 Runway Utilization – Proposed Action

Aircraft Category	Runway End						
	09	27	01L	01R	19L	19R	Total
Daytime Arrivals							
Air Carrier	0.0%	13.7%	33.4%	0.8%	1.2%	50.9%	100.0%
Cargo	0.0%	25.7%	36.4%	3.0%	0.0%	34.9%	100.0%
Commuter/Air Taxi	0.0%	16.9%	24.4%	14.4%	18.1%	26.2%	100.0%
General Aviation	0.0%	16.7%	39.4%	4.4%	3.0%	36.5%	100.0%
Total	**0.0%**	**13.9%**	**33.0%**	**1.6%**	**2.1%**	**49.4%**	**100.0%**
Nighttime Arrivals							
Air Carrier	0.0%	10.7%	40.4%	0.0%	0.0%	48.9%	100.0%
Cargo	0.0%	14.4%	58.8%	1.0%	0.0%	25.8%	100.0%
Commuter/Air Taxi	0.0%	50.0%	50.0%	0.0%	0.0%	0.0%	100.0%
General Aviation	0.0%	7.7%	38.4%	0.0%	0.0%	53.9%	100.0%
Total	**0.0%**	**11.3%**	**41.8%**	**0.1%**	**0.0%**	**46.8%**	**100.0%**
Daytime Departures							
Air Carrier	0.6%	11.3%	36.0%	0.0%	4.4%	47.7%	100.0%
Cargo	0.0%	17.1%	45.8%	2.4%	1.2%	33.5%	100.0%
Commuter/Air Taxi	0.0%	11.8%	34.2%	7.9%	21.7%	24.3%	100.0%
General Aviation	1.5%	14.9%	42.0%	4.4%	1.5%	35.8%	100.0%
Total	**0.6%**	**11.4%**	**36.1%**	**0.4%**	**5.2%**	**46.3%**	**100.0%**
Nighttime Departures							
Air Carrier	1.5%	5.2%	39.7%	0.0%	7.7%	45.9%	100.0%
Cargo	1.2%	5.0%	61.3%	0.0%	0.0%	32.5%	100.0%
Commuter/Air Taxi	0.0%	12.5%	62.5%	0.0%	0.0%	25.0%	100.0%
General Aviation	0.0%	14.2%	43.0%	0.0%	0.0%	42.8%	100.0%
Total	**1.4%**	**5.4%**	**41.8%**	**0.0%**	**6.9%**	**44.5%**	**100.0%**

Source: FAA, 2018, Radar Data; Landrum & Brown, 2018

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Kansas City International Airport
Environmental Assessment, Section 106 Evaluation, and
Section 4(f) Statement

Appendix C

C

Appendix C Section 106 Consultation

This appendix includes key pieces of correspondence and other documentation relating to demonstrating FAA compliance with Section 106 requirements:

1. June 2, 2008 letter from SHPO to KCAD with eligibility determination of cultural resources on Airport property
2. February 6, 2013 letter from FAA to SHPO with initial determination
3. February 14, 2013 letter from SHPO to FAA requesting additional information
4. June 20, 2013 letter from L&B to SHPO with additional information
5. July 16, 2013 letter from SHPO with adverse effect determination
6. August 21, 2013 letter from SHPO with expanded determination
7. September 5, 2013 email from FAA to SHPO with concurrence of determination of adverse effect
8. November 22, 2017 letter from FAA to SHPO formally restarting the Section 106 Consultation Process
9. December 19, 2017 letter from SHPO to FAA concurring with Adverse effect finding and requesting Advisory Council on Historic Preservation (ACHP) coordination
10. December 27, 2017 letters from FAA to Tribes with invitation to participate in Section 106 Consultation Process/ Re-coordinating the Proposed Action
11. January 4, 2018 PowerPoint presentation provided to SHPO at in-person meeting in Jefferson City, MO
12. January 12, 2018 ACHP e-106 submittal from FAA to ACHP
13. January 30, 2018 letter from ACHP to FAA stating their participation not needed at this time/Request copy of MOA when complete
14. January 31, 2018, letter from FAA to SHPO with additional information concerning cut/fill drawings and structures map [referenced enclosures are included in the Golder Associates Phase I Archaeological Survey found later in this appendix].
15. February 13, 2018 invitation for Agency Scoping Meeting for March 15, 2018 sent to SHPO and Tribes
16. March 12, 2018 letter from SHPO to FAA requesting an archeological survey with deep testing and updating the SHPO Log Number to 007-PL-18
17. June 6, 2018 letter from FAA to SHPO and Osage Nation confirming archeological survey methodology
18. July 10, 2018 Archeological Survey Report provided to SHPO for review and comment
19. July 10, 2018 Archeological Survey Report provided to Osage Nation for review and comment
20. Golder Associates Phase I Archaeological Survey (Original dated July 2018 provided in the Public Draft EA. The Revised October 2018 version is provided in this Final document. The document was revised per public comments received)
21. August 14, 2018 letter from SHPO to FAA concurring with the Archeological Survey Report and the recommendation for an unanticipated discovery plan and construction monitoring plan
22. August 21, 2018 letter from Pawnee Nation of Oklahoma to KCAD requesting consultation
23. August 22, 2018 in-person meeting with Osage Nation and August 23, 2018 in-person meeting with the SHPO (Same presentation provided at both meetings)
24. August 27, 2018 correspondence with Kaw Nation initiating consultation

25. August 27, 2018 response from Pawnee Nation stating project should have no potential to adversely affect any known sacred Pawnee sites but stating any undiscovered properties must be immediately reported to them
26. September 28, 2018 correspondence with Ponca Tribe of Oklahoma initiating consultation
27. October 22, 2018 response from Ponca Tribe of Oklahoma requesting Draft EA for review
28. October 22, 2018 correspondence from FAA with Ponca Tribe of Oklahoma forwarding draft EA
29. October 2018 Architectural and Historical Property Evaluation
30. November 15, 2018 FAA's Memorandum - Review of Findings under Section 106 for the Kansas City International Airport Terminal Replacement Project – National Register Eligibility of Resources in the Direct APE [Historic District Determination]
31. November 16, 2018 response from Ponca Tribe of Oklahoma requesting to be a signatory to the PA
32. November 16, 2018 correspondence with ACHP requesting confirmation that they do not want to participate in the Section 106 consultation
33. November 16, 2018 correspondence with the SHPO forwarding the draft PA for their review.
34. November 16, 2018 correspondence with the Tribes forwarding the draft PA for their review
35. December 6, 2018 Watkins Foundation requests consulting status in the Programmatic Agreement
36. December 12, 2018 provided Draft Programmatic Agreement to Mr. Raab and Watkins Foundation and sent email requesting whether the Watkins Foundation wanted to sign the agreement as a concurring party
37. December 19, 2018 letter from SHPO accepting the photographic record of Terminal A and approval to demolish Terminal A upon execution of the PA
38. December 21, 2018 FAA's Memorandum - Review of Findings under Section 106 for the Kansas City International Airport Terminal Replacement Project – National Register Eligibility of Resources in the Direct APE [TCP Determination]
39. December 28, 2018 distributed Programmatic Agreement to FAA, KCAD, SHPO, Kaw Nation, Osage Nation, Pawnee Nation, and Ponca Tribe of Oklahoma for signature
40. January 2, 2019 concurrence letter from SHPO with PA signature, clarification to the PA regarding artifact preservation, approval of photographic record of Terminal A, and approval of Terminal A demolition
41. January 2, 2019 provided final Programmatic Agreement to Mr. Raab and the Watkins Foundation and requested again if they would like to sign the agreement as a concurring party
42. January 14, 2019 FAA documenting no response from ACHP regarding November 16, 2018 request to participate in Section 106 consultation
43. January 15, 2019 correspondence from Kaw Nation declining to sign the PA
44. January 28, 2019 Executed Programmatic Agreement
45. February 8, 2019 FAA documenting no response from Watkins Foundation regarding January 2, 2019 request to be a concurring party to the Programmatic Agreement
46. February 14, 2019 Transmittal to ACHP with Programmatic Agreement and Appendix H of the Final EA-Responses to Public Comments.

STATE OF MISSOURI

Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

June 2, 2008

Judi O'Donnell
Kansas City International Airport
Properties & Commercial Development
601 Brasilia
Kansas City, Missouri 64153

Re: Phase I Survey, Kansas City International Airport (FAA) Platte County, Missouri

Dear Ms. O'Donnell:

Thank you for submitting information on the above referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.L. 89-665, as amended) and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800, which requires identification and evaluation of cultural resources.

We have reviewed the April 2008 report entitled *Cultural Resource Investigations, Phase I Survey, Kansas City International Airport, Platte County, Missouri* by the Environmental Research Center of Missouri, Inc. Based on this review it is evident that a thorough and adequate cultural resources survey has been conducted of the project area. We concur with the investigator's recommendation that that 23PL1507 (the Miller Plantation Site) is eligible for inclusion in the National Register of Historic Places and that archaeological sites 23PL1470 and 23PL1504 may be eligible.

We also concur that the following sites are not eligible for inclusion in the National Register:

23PL1431	23PL1432	23PL1433	23PL1434	23PL1435	23PL1436	23PL1437
23PL1438	23PL1439	23PL1440	23PL1441	23PL1442	23PL1443	23PL1444
23PL1445	23PL1446	23PL1447	23PL1448	23PL1449	23PL1450	23PL1451
23PL1452	23PL1453	23PL1454	23PL1455	23PL1456	23PL1457	23PL1458
23PL1459	23PL1460	23PL1461	23PL1462	23PL1463	23PL1464	23PL1464
23PL1465	23PL1466	23PL1467	23PL1468	23PL1469	23PL1471	23PL1472
23PL1476	14PL1477	23PL1478	23PL1479	23PL1480	23PL1481	23PL1482
23PL1483	23PL1484	23PL1485	23PL1486	23PL1487	23PL1488	23PL1489
23PL1490	23PL1491	23PL1492	23PL1493	23PL1494	23PL1495	23PL1496
23PL1497	23PL1498	23PL1499	23PL1500	23PL1501	23PL1502	23PL1503
23PL1505	23PL1506	23PL1508				

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If you have any questions, please write Judith Deel at State Historic Preservation Office, P.O. Box 176, Jefferson City, Missouri 65102 or call 573/751-7862. Please be sure to include the SHPO Log Number **(016-PL-08)** on all future correspondence or inquiries relating to this project.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Mark A. Miles
Director and Deputy
State Historic Preservation Officer

MAM:jd

c Todd Madison, FAA
Craig Sturdevant, ERC

U.S. Department
of Transportation

**Federal Aviation
Administration**

Central Region
Iowa, Kansas,
Missouri, Nebraska

901 Locust
Kansas City, Missouri 64106
(816) 329-2600

February 6, 2013

Mr. Mark Miles
Director, State Historic Preservation Office
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

**Subject: Determination of No Historic Properties Affected
Environmental Assessment for the Proposed Replacement Terminal Project
at the Kansas City International Airport**

Dear Mr. Miles:

This letter is sent to you in accordance with 36 CFR part 800 which governs Section 106 of the National Historic Preservation Act (NHPA) to notify your agency that an Environmental Assessment (EA) is being prepared to determine the potential environmental impacts of a proposed replacement terminal project at the Kansas City International Airport (KCI) in Kansas City, Missouri as shown on **Exhibit 1, *Airport Location Map***.

This EA will investigate, analyze, and disclose any potential environmental impacts of the Proposed Project and its reasonable alternatives. The Federal Aviation Administration (FAA) is the lead agency and as such the document will be prepared in accordance with FAA Order 1050.1E, *Environmental Impacts: Policies and Procedures,* FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions,* and the FAA's Environmental Desk Reference for Airport Actions.

Project Description

The purpose of the proposed replacement terminal project is to reduce operating costs and enhance revenues for Kansas City Aviation Department (KCAD) while improving passenger processing and efficiency within the terminal and provide convenient roadways, public vehicle parking, and traffic flow for Airport users and vehicles. It is KCAD's goal to provide a high level of air service, as well as a source of community pride for Kansas City and the Metro Region in a cost-effective and affordable manner. The new terminal will incorporate the latest in passenger processing technology and achieve a balanced capacity of gates, terminal processing, and landside facilities.

The Proposed Project, occurring completely on airport owned property, includes the following major projects which are shown on **Exhibit 2, *Proposed Project.***

- Decommission and demolish existing Terminal A, including the Terminal A apron;
- Construct approximately 975,000 square foot of replacement terminal;
- Construct new terminal apron area and associated taxiway modifications;

- Decommission and demolish existing Terminal B and consolidate airline operations at the new replacement Terminal;
- Decommission Terminal C and consolidate airline operations at the new replacement Terminal;
- Potential changes to FAA facilities, including but not limited to compound wall, roadways, vehicle parking, duct banks, cable loop, Remote Transmitter/Receiver;
- Relocate Police Station and Data Center;
- Construct new six-level parking garage with approximately 7,600 spaces and a surface parking lot of approximately 2,400 spaces;
- Modify existing roadways and construct new roadways in the terminal area;
- Construct various storm water collection system improvements including improved glycol recovery system and facilities (Includes removal of one or two existing storm water ponds);
- Construct replacement utility infrastructure including a new chilled water plant and approximately 32,000 square foot replacement Central Utility Plant; and,
- Resurface and Rehabilitate Taxiways.

Area of Potential Effect

As described in 36 CFR 800.4(a)(1) and in 36 CFR 800.16(d) the Area of Potential Effect (APE) for historic resources including structures and archaeological sites, is defined as "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist."

The undertaking would include ground disturbance and construction activities within the existing terminal complex as shown on **Exhibit 3, Areas of Potential Disturbance**. The land uses within this area are made up of developed land used for Airport operations. Therefore for direct impacts the area of potential disturbance was included in the APE.

For indirect impacts, such as impacts due to noise or changes in view, the APE was identified by first identifying historic properties near the Airport and then identifying the geographic area within which the undertaking may cause changes in the character or use of the historic properties. The most recent Airport noise study was used as the best available prediction of significant noise levels in the near term. The APE was drawn based on the 65 DNL from the noise study, but enlarged to take into account the potential increase in the area exposed to 65 DNL that could occur as a result of this undertaking. The APE for the undertaking, which takes into account potential for both direct and indirect impacts, is shown on **Exhibit 4, *Area of Potential Effect***.

Identification of Historic Properties

In 2008, a cultural resources survey of the Airport was completed. The survey covered approximately 8,000 acres of land. Of all the cultural resources sites, sites 23PL1470 and 23PL1504 were identified as those that might meet NRHP eligibility and site 23PL1507 was identified as meeting NRHP eligibility criteria. These sites are listed in **Table 1, *Archaeology Site Summary*** and shown on Exhibit 4. This determination was confirmed by your office by letter dated June 2, 2008.[1]

Table 1
ARCHAEOLOGY SITE SUMMARY
Kansas City International Airport

Identifier	Location	Description
23PL1470	West of existing Airport facilities.	Early stone house foundation retaining integrity
23PL1504	South of the existing Airport facilities.	The Davis Farmstead limestone basement foundation with steps, a cistern and well.
23PL1507	South of the existing Airport facilities.	Foundations of the Miller Plantation/Farm main house, a chimney on the east end and depressions that may be remains of outbuildings.

Source: Environmental Research Center of Missouri, Inc., *Cultural Resource Investigations: Phase I Survey, Kansas City International Airport Platte County Missouri,* April 2008.

An evaluation of historic properties also included Terminals A and B. The undertaking includes the demolition of these terminals. Both of these terminals were opened in 1972 and there is no evidence of a historic act occurring within the terminals themselves. Therefore they do not meet the 50-year criteria for eligibility to the NRHP. In addition, while the terminals were designed by the architect, Clarence Kivett, who was one of Kansas City's most influential architects, the "drive to the gate" concept is not specific to him or to Kansas City and, therefore, the terminals are not unique in design. As a result, neither Terminal A nor Terminal B is considered eligible for the NRHP.

Assessment of Affect on Properties

Construction and operation of the undertaking would not physically destroy or alter any historic properties or remove any properties from its historic location. Therefore there would be no direct impacts due to the undertaking.

In order to determine potential indirect impacts, a noise assessment was conducted. The FAA's Land Use Compatibility Guidelines were used to determine the significance of potential impacts. The undertaking would not result in significant increases of noise on the historic sites. Furthermore, the view from the historic sites to the project area would remain what they are today- airport terminals. The undertaking would not alter the view of the historic sites from any current location. The undertaking would not introduce an atmospheric, audible, or visual feature

[1] Mark A. Miles, Director and Deputy State Historic Preservation Officer State of Missouri Department of Natural Resources letter to Judi O'Donnell Kansas City International Airport. Re: Phase I Survey, Kansas City International Airport, June 2, 2008.

to the area that would diminish the integrity of any property's setting or through transfer, sale, or lease, diminishes the long-term preservation of any property's historic significance that Federal ownership or control would otherwise ensure. Therefore, there would be no indirect impacts due to the undertaking.

For the reasons detailed above, no NRHP historic structures or historic properties would be directly or indirectly impacted by the undertaking. A historical or cultural resource survey is not necessary in accordance with 36 CFR 800.4 and 36 CFR 800.5 "No historic properties affected." If however during construction activities any historic, architectural, archaeological, or cultural resource items are uncovered, immediate consultation with the State Historic Preservation Officer (SHPO) would occur.

We would appreciate your comments and concurrence (via mail or e-mail). Please include any regulatory, compliance, or permitting requirements by March 11th. If you would like additional information on this project, or would like to speak with me directly, please do not hesitate to contact me at (816) 329-2617 or glenn.helm@faa.gov. Thank you for your assistance.

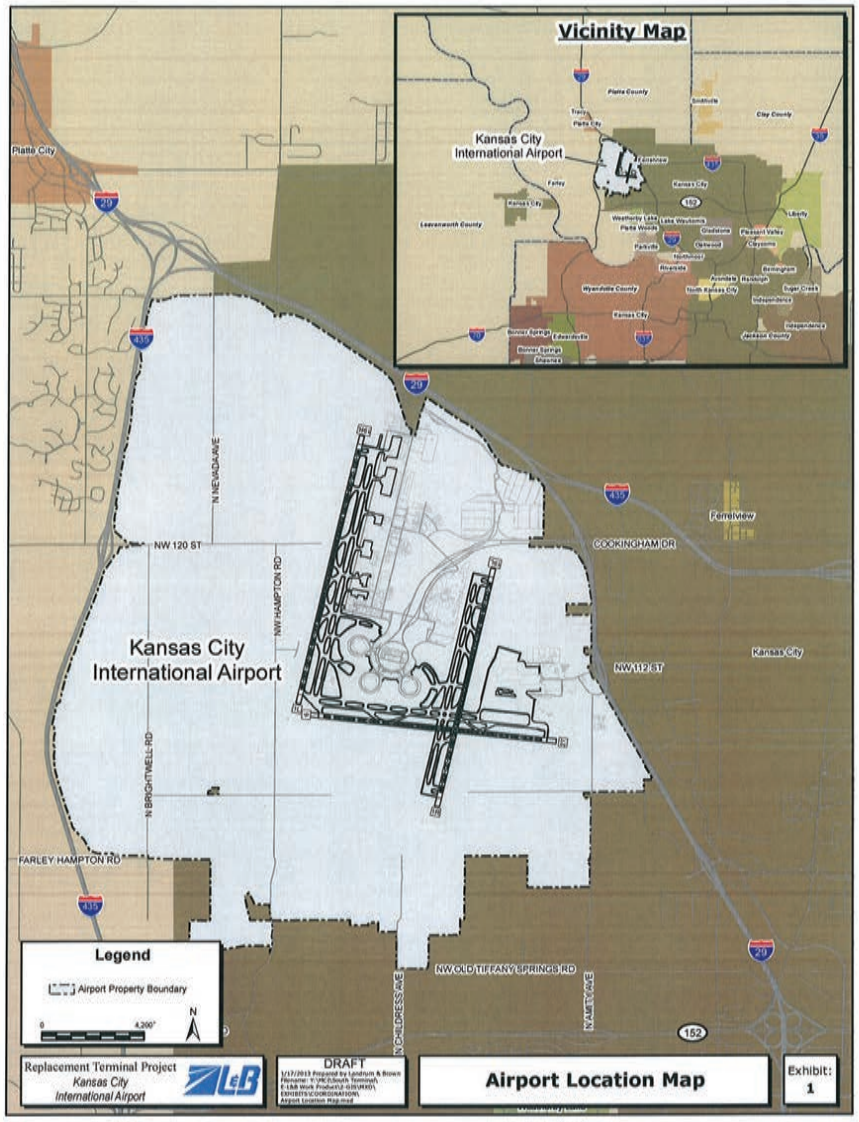
Sincerely,

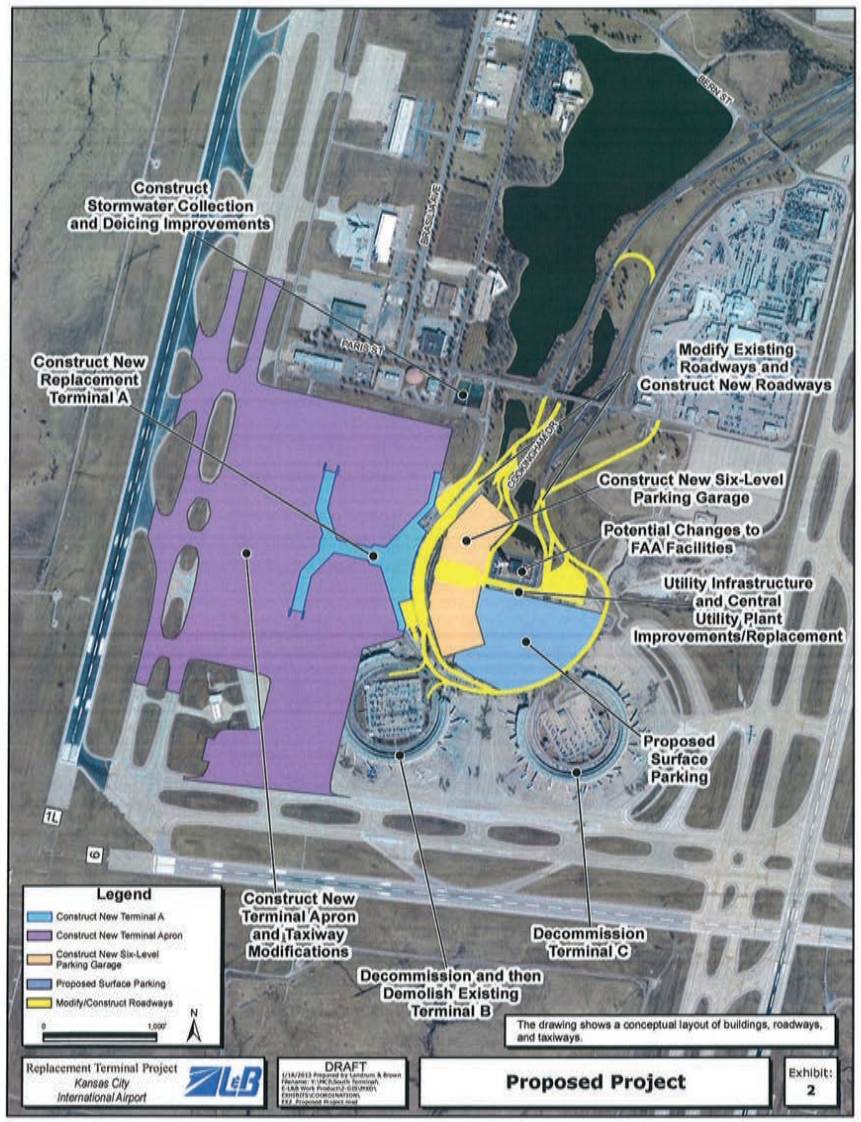
Glenn Helm

Glenn Helm, P.E.
Environmental Specialist

Enclosures

Cc: Phil Muncy, P.E., Kansas City Aviation Department
Rob Adams, Landrum & Brown

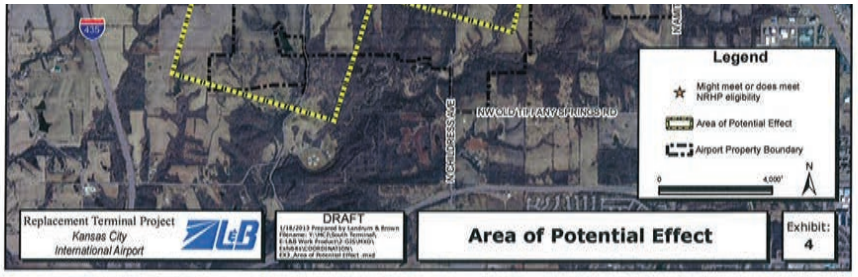

Vicinity Map
Kansas City International Airport
Platte City
Kansas City International Airport
NW 120 ST
NW HAMPTON RD
N NEVADA AVE
N BRIGHTWELL RD
FARLEY HAMPTON RD
COOKINGHAM DR
Ferrelview
NW 112 ST
Kansas City
NW OLD TIFFANY SPRINGS RD
N CHILDRESS AVE
N AMERY AVE
Legend
Airport Property Boundary
Replacement Terminal Project
Kansas City International Airport
DRAFT
Airport Location Map
Exhibit: 1


Construct Stormwater Collection and Deicing Improvements
Construct New Replacement Terminal A
Modify Existing Roadways and Construct New Roadways
Construct New Six-Level Parking Garage
Potential Changes to FAA Facilities
Utility Infrastructure and Central Utility Plant Improvements/Replacement
Proposed Surface Parking
Construct New Terminal Apron and Taxiway Modifications
Decommission Terminal C
Decommission and then Demolish Existing Terminal B
Legend
Construct New Terminal A
Construct New Terminal Apron
Construct New Six-Level Parking Garage
Proposed Surface Parking
Modify/Construct Roadways
The drawing shows a conceptual layout of buildings, roadways, and taxiways.
Replacement Terminal Project
Kansas City International Airport
DRAFT
Proposed Project
Exhibit: 2





Information contained in this exhibit relating to the nature and location of the archeological sites is considered confidential and not for public disclosure in accordance with Section 304 of the National Historic Preservation Act (54 USC § 307103; 36 CFR Part 800.6 (a)(5) of the advisory Council on Historic Preservation's rules implementing Sections 106 and 110 of the Act; and Section 9(a) of the Archeological Resources Protection Act (54 USC §100707).



STATE OF MISSOURI

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

February 14, 2013

Glenn Helm, P.E.
Environmental Specialist
Federal Aviation Administration
901 Locust
Kansas City, Missouri 64106

Re: Kansas City International Airport Terminal Replacement Project (FAA) Kansas City, Platte County, Missouri

Dear Mr. Helm:

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

Your submittal did not include adequate information to review your project under Section 106 of the National Historic Preservation Act (P.L. 89-665, as amended). Please provide photographs of the terminals proposed for demolition. Please remember, clear black and white or color photographic prints (minimum 3" x 5") are acceptable. Polaroid photos, photocopies, and faxed photographs are not acceptable. We do accept high quality digital photographs, however a paper copy must be provided and the print must be at least 600 *dpi*. If there are a large number of images, you may submit them on a cd. **Good quality photographs are important for expeditious project review**. We would also appreciate more detailed information on the history of the planning and development of the terminals, on the architect and any comparable works, and a description of any alterations that have taken place over time. When we receive the necessary information we can complete review of this project.

If you have any questions, please write the State Historic Preservation Office, P.O. Box 176, Jefferson City, Missouri 65012 or call Judith Deel at 573/751-7862. Please be sure to include the SHPO Log Number **(007-PL-13)** on all future correspondence or inquiries relating to this project.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Mark A. Miles
Director and Deputy
State Historic Preservation Officer

MAM:jd

c Todd Madison, FAA

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June 20, 2013

Landrum & Brown
11279 Cornell Park Drive
Cincinnati, OH 45242
Tel: 513.530.5333
Fax: 513.530.1278
www.landrum-brown.com

Mark A. Miles
Director and Deputy State Historic Preservation Officer
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

Subject: SHPO Log Number (007-PL-13)

Dear Mr. Miles:

Mr. Glenn Helms from the Federal Aviation Administration (FAA) has requested that we respond to your letter of February 14, 2013 on behalf of the FAA. Mr. Helms has reviewed the information provided herewith and is copied on this transmittal. Please find below the information requested in your February 14, 2013 letter in order to review the project under Section 106 of the National Historic Preservation Act (P.L. 89-665, as amended).

Per your request, we have provided several photographs on the enclosed CD. Please note that the photographs are organized in two groups: *Recent Pictures* show current views of the structures and *Renovation Pictures* show specific updates that have occurred in the last 12 years.

Your letter also requested additional information on the history of the planning and development of Terminals A & B, alterations of the original structure, the architect who designed the buildings, and comparable works. This information is included in the enclosed report, as well as on the CD. In addition, we were able to locate the original Master Plan for the Airport, which provided a good deal of the information related to the planning and background. We have scanned that document and placed it on the CD for your records.

To help in our preparation of the EA, we would appreciate your input (via mail or e-mail), including any regulatory, compliance, or permitting requirements by July 20th. Please send any comments to the following:

Landrum & Brown
Attn: Rob Adams, KCI Replacement Terminal EA
11279 Cornell Park Drive
Cincinnati, OH 45242

Or e-mail: radams@landrum-brown.com

If you would like additional information on this project, or would like to speak with me directly, please do not hesitate to contact me at (513) 530-1201. Thank you for your assistance.

Sincerely,

Rob Adams
Vice President

Attachments

Cc: Glenn Helm, P.E., Federal Aviation Administration
Phil Muncy, P.E., Kansas City Aviation Department

KCI Terminal Project

Additional Information for State Historic Preservation Office

June 2013

1. BACKGROUND AND PLANNING

The following indented sections on the background and planning for the passenger terminals at Kansas City International Airport (KCI) were derived using portions of the original 1966 Master Plan prepared for the initial Kansas City airport terminal project.[1] The complete original document has been scanned and provided on the CD that is included with this submittal.

Introduction

The need for a future second airport to serve the Kansas City area was recognized as early as 1940. Mid-Continent International Airport became a reality in 1953 with the purchase of nearly 5,000 acres of land in Platte County, some 15 miles north and slightly west of the downtown area of Kansas City, Missouri. The site selection came after months of consideration and conferring at length with expert consultants of air transportation, the airlines serving the City, and representatives of the Civil Aeronautics Administration.

In 1953 the City retained James C. Buckley, Inc., terminal and transportation consultants of New York, to prepare a master plan study of the new airport. The study was to set forth the projected development of aviation in the Kansas City area and to develop a plan for meeting anticipated growth when and as needed. These studies, together with those made by the various planning staffs of the City in cooperation with the Civil Aeronautics Administration, resulted in a plan for the initial development of Mid-Continent International Airport.

In the late 1950's the City had prepared a detailed study of the passenger terminal complex. This resulted in a plan which envisioned the use of four ticketing and baggage buildings with under-the-apron connections to satellite boarding structures, each capable of serving 10 aircraft positions. The ultimate plan envisioned at that time was to provide a total of 40 aircraft positions. This plan was followed in the initial terminal area development including the control tower, paved areas, parking and existing utilities.

The industry experienced a growth pattern far in excess of that anticipated in the previous studies. This was due in part to the nearly complete transformation to jet aircraft and its salutary effort on travel habits. These factors, plus the influence of new aircraft designs and projected traffic studies, suggested that the planning of KCI be updated with a view to providing a facility more compatible with the current and anticipated needs.

[1] Mid-Continent International Airport, Kansas City, Missouri, Master Plan Development, prepared by Burns & McDonnel and Kivett & Meyers, 1966.

In 1965, after having begun action to move commercial operations to KCI, the City retained Burns & McDonnell in association with Kivett & Myers to provide a master planning study. The early studies involved schematic layouts of many plans and brief comparative study analyses of each. This led to further refinements and study of eight basic plans meriting further consideration.

This report summarized the planning studies conducted in the development of the Master Plan for KCI. In addition, it set forth criteria used in the studies, together with analyses of two concepts which were analyzed in detail, with emphasis on the selected concept. It also presented a detailed discussion of the selected concept, including comprehensive planning layouts and estimates of construction costs.

Planning Background

Airport planning in the late 1960's encountered new challenges almost daily as an ever-expanding industry improved its service and continued to explore and develop more efficient methods of serving the air traveler. Planning up to that point had been most influenced by a succession of "plateaus" wherein air travel growth pattern experienced rapid increases both in total passengers and total aircraft movements.

The emergence of the Douglas DC3, DC4, and early Constellation-type aircraft produced the first significant growth in air travel in the late 1930's and into the 1940's. The next significant increase developed in the early 1950's, as the DC6, DC7, and the larger Constellation series came into being. Along with these types of aircraft the turbine-powered propeller-driven aircraft also began to influence the growth in air travel. In the late 1950's and early 1960's era, the jet age was ushered in and had brought about the most significant growth in air travel to date. At that time it was recognized that giant airliners, capable of serving 400+ passengers were being developed.

Airports had grown from relatively limited facilities consisting of a small terminal building serving, perhaps, one to five aircraft positions to sprawling facilities and several buildings servings as many as 100 positions. In the early years of growth, the existing facility was usually expanded by increasing the number of aircraft positions alongside enclosed walkways called "fingers." These "fingers" eventually began to include waiting areas called departure lounges or gate hold rooms. This feature tended to reduce the crowded atmosphere of the original building and produce some efficiencies which could have not been otherwise achieved without major expansion. Along with the developments to meet the ever-increasing demand came new problems – increased aircraft taxiing and maneuvering cost, limited expansion capability, greatly increased walking distances for passengers, larger and larger aircraft, and more complex vehicular circulation.

As the jet age approached in the mid 1950's, major airport design began a transition to decentralization of facilities such as at the Los Angeles and New York Airports. Central terminals are replaced with several smaller facilities, each designed to serve smaller number of aircraft and at the same time achieve operating efficiencies and reasonable walking distances for the majority of passengers.

Other airport planning made use of busses or automated devices of mechanical conveyances to transport the passenger to remote aircraft parking areas, allowing the return to a compact centralized terminal. This type of system was employed at several US and European airports to transfer passengers.

Planning for KCI considered the many factors contributing to the success of airport design in the past, together with a forward look to the requirements yet to come. A tentative space program was developed around the airlines' June 1965 request for rental areas with additional allowance for concession, management, and public space consistent with good planning and the layout being evaluated.

The planning envisioned an ultimate airport requiring 60 aircraft positions at 200-foot spacing, a minimum of 900 automobile parking spaces for passengers and employees, and building requirements as referred to above. Of the many plans investigated, eight were considered to have merit for further study leading to selection of a plan for Kansas City's new airport.

Evaluations of each plan were conducted with a view to the relative merits of each in fulfilling these major considerations:

PASSENGER CONVENIENCE – in terms of walking distance, circulation, comfort, availability of concessions, and clarity.

COSTS – in terms of capital outlay, annual maintenance and operating cost, concession revenue and airline costs.

AIRLINE OPERATIONS – in terms of aircraft circulation and parking, baggage handling, customer service, and the ability to expand the facility without major construction.

VEHICULAR CIRCULATION – in terms of passenger handling, curb length, clarity of flow, adequate and convenient parking, and movement of operational equipment.

The Selected Concept

Upon completion of the comprehensive studies of the eight plans, the City planning team and the airlines serving Kansas City expressed unanimous preference for Concept 7. The City Council approved Concept 7 for development as Kansas City's terminal.

The plan originally consisted of four buildings (three were ultimately built), each serving 15 aircraft positions, arranged contiguous to a circular looped entrance roadway. The airport entrance road entered the complex and feeds onto the one-way circular loop road passing each of the terminals. Each building is in the form of a circular concourse structure. Fifteen aircraft positions were provided around the outside of the circular building, which in turn, surrounded a great percentage of the required parking area for the terminal.

The original plan showed the unit terminal buildings connected by an enclosed concourse to be constructed at some future date to provide sheltered walkways between the terminals and/or the parking areas. It was thought that these walkways could someday be replaced by an automated shuttle device. These walkways were never built and passenger flow between buildings was accomplished by shuttle buses utilizing the road system.

This concept was developed to produce the "drive-to-the-gate" capability for a great percentage of the passengers. The plan permits the passenger, if driven to the airport, to arrive virtually at the door of the aircraft. The enplaning and deplaning curb is directly across a narrow concourse from the aircraft position. The passenger driving his own car is able to park nearby and with a relatively short walk be at the aircraft position. Ticketing and baggage facilities are located at short intervals along the building to minimize lateral movement. The plan was designed to achieve passenger convenience, in terms of walking distance, to a far greater degree than any comparable terminal facility at that time that did not utilize a form of passenger transfer device.

2. SITE PLANNING

The land now occupied by KCI was annexed into the Kansas City limits in 1953 prior to development of the airfield. This site was chosen in part because the surrounding area was largely undeveloped and the open space provided a buffer to jet air craft noise. Only a small portion of the total site has been developed for the airport facilities over the past sixty years, and the surrounding acreage remains open pastureland.

A four-lane divided parkway carries traffic between the airport and Interstate-29 and Cookingham Drive. The median is landscaped with small lakes and art work. Tall metal poles hold large wayfinding signs along the road.

From the entrance to the airport, the traffic pattern is one-way. Motorists have the option of looping in to one of the three terminals or following the one-way pattern back to the highway. Secondary roads access administration and support facilities on the larger property, such as the airport hotel, rental car hub, and cargo terminals.

Within each terminal loop the road remains one-way with four lanes. An intermittent concrete median separates the inner and outer lanes. Small metal and glass structures on the medians shelter travelers waiting for shuttle busses. Wide sidewalks run in front of each terminal. The roof of the terminal buildings cantilevers over the sidewalks to shelter waiting travelers.

The KCI terminals originally opened with surface parking lots inside the three circles. Today, tiered parking structures (Terminal A - 1988, Terminal B – 1991, Terminal C - 1997) surrounded by a grassy moat are located at the center of each terminal loop. The top level of each parking structure is at-grade with the road and terminal. Walkways across the gap lead pedestrians from parking garage to terminal.

On the airside of the terminals a continuous concrete apron and taxiways connect to the three airport runways.

3. ARCHITECTURE

Three identical low-slung horseshoe-shaped buildings form the decentralized airport terminal complex. In plan the terminals radiate from a circular hub, on which sit an administration building and the air traffic control tower. The current air traffic control tower replaced the original tower in 1994, but the other buildings were designed in 1965 -1967 by Kivett and Myers. Each terminal measures 2,300 feet long and 65 feet tall, enclosing roughly 80 percent of a circle that measures 1,000 feet in diameter.[2] The original depth of each terminal was 75 feet, but was expanded to varying depths with the maximum being 90 feet. The primary passenger level is accessible from the landside access road. This level houses passenger gates, baggage claim, and concessions. Construction began in 1968 and was complete at the end of 1972.

The geometric forms of the terminals and the textured concrete surfaces express the Brutalist architectural style. Drawing on the modernist architectural movement, the Brutalist architectural style flourished from the 1950s to the mid-1970s. Physical characteristics of Brutalist architecture include very linear, fortress like and blockish structures, often with a predominance of concrete construction. Initially the style came about for government buildings, low-rent housing and shopping centers to create functional structures at a low cost, but eventually designers adopted the look for other uses such as college buildings and other commercial facilities. The English architects Alison and Peter Smithson coined the term in 1953, from the French béton brut, or "raw concrete", a phrase used by Le Corbusier to describe the poured board-marked concrete with which he constructed many of his post-World War II buildings. For the KCI terminal, the architects combined the light-colored concrete with ample glazing, high ceilings, and wood elements to help soften the interior of the cold look and feel of the exposed concrete structure. The exposed concrete structure does not have a vapor barrier or other finished wall

[2] Hanan A. Kivett, *Kansas City International Airport: World's Shortest Walk-to-Fly,* Meeting Reprint, (Milwaukee, Wisconsin: American Society of Civil Engineers, 1972), Kivett & Myers Collection, SHSMO Research Center – Kansas City, University of Missouri – Kansas City University Archives.

elements towards the interior of the terminal spaces. The cast exterior concrete element is the interior concrete surface. As a result, there is no conventional sandwich wall with thermal isolation or moisture protection from outside to inside.

Security upgrades were made to the initial terminals beginning within months after the airport opened. As early as 1974, eight-foot tall glass partitions were installed to enclose gate lounges. More comprehensive airport upgrades at the turn of the twenty-first century replaced the original air traffic control tower and updated interior terminal finishes and glazing. The changes also addressed post-9/11 security requirements by bundling gates to reduce the number of security check points. While passengers now walk more than 100 feet between curb and plane, that distance remains significantly shorter than in most airports.

Strong geometric forms compose each terminal building. X-shaped columns on the landside of the terminal are legible outside and inside the building. The airside columns terminate in V-shaped tops that cant inward. The exposed concrete ceiling inside the terminal reveals a honeycomb grid of members.

The terminals read as two stories on the landside elevations. Multi-light fixed glazing fills triangular and trapezoidal clerestory windows. All exterior glazing was replaced during the Terminal Improvement Program (TIP) of 2000 – 2004. As a result, no original glass or glazing elements remain. Immediately below the windows the heavy concrete slab extends 25 feet forward to shelter the sidewalk. The structural web visible on the underside of the canopy is part of the original design.

Street-level Glazing and Entrances

Original

The original façade design read as a flat plane, in which sets of sliding doors alternated with fixed glazed panels. The area above each glazing bay was an unbroken, wood-clad panel that angled upward and away from the wall, filling the adjacent cove created by the structural members. The doors opened directly into the terminal concourse without an intervening vestibule.

Current

Recessed below the canopy, alternating bays of windows and entry doors project as semi-lozenges from the plane of the terminal structure. The street-level glazing, installed around the year 2000, features a metal storefront system that divides each bay into a geometric pattern with rectangular panes of varying sizes. The storefront framing rests on a low cast-concrete bulkhead that is smooth in texture but similar in color to the original concrete structure. The plane of the new glazing and entry systems aligns with the front of the structural cove and encompasses the area originally clad with wood.

Each entrance has roughly the same footprint as the glazing. Four pairs of automatic sliding doors form each entry. Storefront glazing similar to the window bays fills the opening around the doors. Two sets of doors (exterior and interior) form a vestibule at each entrance. In some locations the interior vestibule wall aligns vertically below the concrete structural header and in others the vestibule projects slightly into the terminal, mirroring its exterior footprint.

Airside Elevation

The ribbed concrete structure is also expressed on the airside façade of each terminal. This façade reads as three levels that step back slightly as the building rises. The upper edge of the two uppermost concrete spandrels leans into the setback, emphasizing the convex form of the façade. The concrete spandrel between the two lower levels presents a flat face, but the underside is slightly canted so that the walls below appear to be slightly recessed. The spine of the major structural columns projects slightly from the plane of the façade. The V-shaped top of each column reclines with the uppermost spandrel. Glazing within each "V" provides a skylight to the interior space. Attached to each structural column is a tall metal light pole with a square fixture head that lights the apron at night.

The two upper levels of the airside façade are glazed. Ribbons of metal-framed fixed windows fill the openings between concrete columns. The glass in the upper ribbons has a frit (which casts a bluish tint) similar to the landside clerestory windows. This band runs between the large structural columns. Intermediate piers break the lower window bands into smaller sections. The piers extend to the ground, where they define bays at the service level.

Painted concrete masonry units (CMU) fill the ground level bays between the columns and piers. The horizontal slab that forms the header for this level is slightly canted on the underside. The CMU walls sit behind the canted plane, slightly recessed from the facade. Within the CMU, some bays have glass block windows, overhead vehicular doors, or metal slab pedestrian doors. Concrete bollards run in front of the façade at locations where vehicular entrance is not required. The metal frame for a canopy also runs intermittently along the façade. The CMU infill does not appear to be original, but its date of addition is unknown.

Accordion-style passenger boarding structures project periodically from the second level on the airside of the building. These wheeled elements provide direct access from the terminal gate lounges to the parked planes.

Interior

Original

The narrow terminal form allows for a nearly column-free interior. Structural columns integral with the outer walls carry the primary loads. The exposed concrete structure was a predominate part of the interior finish. It is visible at the ceiling and at numerous columns on the perimeter walls. An 8-foot high wood soffit

was installed along the entire length of the landside. The entry doors and seating areas also had the 8-foot high soffit. An interior backlit sign was attached to this soffit.

An open concourse ran the length of each terminal. Stations around the airside perimeter featured open gate lounges, baggage claim areas, and customer service counters. Offices, lounges and dining areas occupied intermittent mezzanines along the airside. The high concrete ceiling is the exposed concrete roof structure and windows from both sides of the building provide abundant daylight. Doors leading to the passenger boarding structures were integrated into the airside glazing in the gate areas.

Current

Today, the concourse remains the organizing element of the terminals. The integrated terminal/concourse consists of both open and enclosed spaces. Twelve-foot tall glass walls partition the gate areas into secured passenger holdrooms and form a separation between secure and non-secure areas of the terminals.

Located on the non-secure landside potion of the terminal are ticketing and check-in counters and kiosks, baggage claim, and public restrooms along with public waiting areas and traveler information kiosks (transportation, hotels, etc.) situated in glazed alcoves open to the concourse. Enclosed spaces on the landside include public restrooms and food & beverage and retail concessions. Food and beverage concessions are situated on both the mezzanine and main passenger levels of the landside portion of the terminals with retail concessions only on the passenger boarding level.

Located on the secure airside are the passenger holdrooms, limited public restrooms and minimum food and beverage concessions. Movable passenger loading bridges arrayed around the convex perimeter of each terminal provide connection to and from the parked aircraft and the secured holdroom.

Aircraft services and building mechanical systems are housed at the lower level of the terminals, accessible from the airside of the building.

Aside from the existing original exposed concrete structure, most interior finishes reflect the Terminal Improvement Program, a $258 million airport upgrade of 800,000 sf. of all three unit terminals completed in 2004. This work was undertaken by local Kansas City firm HNTB, with assistance from 360^0 Architecture and Wellner Architects, and included:

- Replaced lighting and building mechanical, electrical and plumbing systems.
- New terrazzo floors
- Added limited restrooms and concessions inside the passenger holding areas
- Blast resistant glazing was installed on the landside, security screening walls, and airsides of the terminals

- Increased the size of each vestibules
- Additional space for concessions on the landside with some minor concession locations on the airside
- More public seating on the landside
- New and more functional directional wayfinding signage
- Relocated mechanical ductwork
- New finishes throughout
- New inbound baggage handling system and claim devices and updated arrivals/departure screens
- New Airline ticketing counters of a common design with task lighting in lowered eyebrows above the ticket counters in the two story spaces
- Removed the landside entry soffit and continuous back lit sign band and added more windows for increased interior daylighting
- Departure Lounge security walls were raised from 8 feet high to 12 feet high
- A common design for ticket counters that includes sunshade devices

The terrazzo concourse floor was funded as a public art project in conjunction with these airport improvements. On the airside of the concourse and in the landside alcoves the terminal floor is carpeted. The restrooms and dining areas have ceramic tile floors and dropped ceilings.

The 2004 improvements also addressed post-9/11 changes to airport security. To reduce the number of security checkpoints, multiple gates were bundled into larger waiting lounges on the airside of the terminal but still 14 separate security screening checkpoints are required to process passengers. Twelve-foot tall partitions enclose the waiting lounges. The partitions are constructed of storefront framing filled with solid panels and upper glazing. Within the partitions, each gate area is a large open space filled with rows of conjoined seating. More recently concession stands and restrooms have been added at the ends of most gate areas

4. ARCHITECT

The local architectural firm of Kivett & Myers, specifically Clarence Kivett, was the architect of record for the KCI passenger terminals. Kivett & Meyers was prolific in Kansas City during the second half of the twentieth century. Established in 1940 by Clarence Kivett and Ralph Myers, the firm thrived for thirty years. Its ability to embrace opportunities provided by external circumstance was paired with innate skill and a highly-cultivated philosophy that combined creativity and flexibility to achieve good design and please clients.[3] Kansas City's leading architectural design firm after World War II, Kivett & Myers produced a broad spectrum of projects, including some of Kansas City's most notable structures. Growing from less than ten employees to almost one hundred employees at its peak, the firm's popularity

[3] David H. Sachs, *Space for Architecture: The Practice of Kivett & Myers (1945-1976)* (Kansas City: American Institute of Architects/Kansas City, 1993), 1.

grew with the acceptance of Modern Movement architecture. Throughout the firm's history Kivett & Myers maintained a philosophy based on purity of form, structural expression and technological innovation that resulted in a high degree of stylistic consistency.

After Clarence Kivett graduated from the University of Kansas in 1928, he took a position with the Kansas City firm Madorie & Bihr. A couple years later, he joined Hoit, Price & Barnes, then one the city's top architecture offices.[4] As the economy crashed during the Great Depression, Kivett was laid off from his job. He immediately started his own firm, taking small jobs remodeling residential and commercial buildings and managing construction projects. Kivett quickly learned that broadening his skill set and his services enhanced his marketability. His experience managing construction gave him insight into the contractor's perspective, which he factored into the design and construction process throughout his career.[5] In 1934, he teamed with the firm Frohwerk & Bloomgarten to design the iconic Moderne Katz Drug Store at Westport Road and Main Street in Kansas City, Missouri.[6]

Ralph Myers joined Kivett's practice after graduating from the University of Illinois in 1940. Separated during World War II, the two reunited in 1945 to continue their abundant and progressive career.[7] Although they differed in their approach to a project, both Kivett and Myers understood the aesthetic value of Modern architecture and expertly convinced clients of that understanding. Kivett was more

interested in the schematic phase of a project and defining creative solutions, while Myers favored efficiency and concrete resolutions, quickly moving on to the next problem.[8]

Through the 1950s, Kivett & Myers' projects included small commissions, such as office remodelings and home additions, as well as larger commissions, such as designs for residential and commercial buildings, hotels, libraries, country clubs and nursing homes. Kivett & Myers did the majority of design work for the local Katz Drug Store chain, which was owned by Kivett's uncles. Although Kivett & Myers initially obtained the Katz Drug Store commission through family connections, it was their ability to deftly meet their clients' aesthetic and economic needs that secured many repeat engagements. Other regular clients included the Woolf Brothers department store chain and Milgrams grocery stores.[9]

[4] Donald Hoffman, "A Foundation of Midwest Architecture: Clarence Kivett is the Mentor of More than 50 Design Firms," *Kansas City Star,* 18 October 1982, 1B. Vertical File: Clarence Kivett. Kansas City (Missouri) Historic Preservation Commission. Both the Kansas City Power and Light Company Building and the Fidelity Bank and Trust Building are listed in the National Register of Historic Places.

[5] Sachs, 3.

[6] Joe Gose, "Incredible Inspiration is Gone: Clarence Kivett, a Leading Force in Kansas City Architecture Dies at 91," *Kansas City Star*, 5 December 1996, A1. Vertical File: Clarence Kivett. Kansas City (Missouri) Historic Preservation Commission.

[7] Gose.

[8] Sachs, 5.

[9] Sachs, 5.

During the 1960s and 1970s, Kivett & Myers received larger, more prominent commissions. These included schools, stadiums, banks, and hospitals. The firm worked mostly in the Kansas City area, but their portfolio expanded to include projects built across the United States. During the firm's later years, Kivett & Myers received multiple commissions from the Boise Cascade paper company in locations around the country; for athletic stadiums in New Jersey, Buffalo, New York and Santa Clara, California; for hotels in Des Moines, Iowa and Arlington, Virginia; and for a remodeling project at the Waldorf-Astoria Hotel in New York City. Their most notable local works include the Missouri Public Service Company Building (1956) in Raytown, Missouri; and Temple B'nai Jehudah (1959-demolished), the Missouri State Office Building (1960), the Jackson County Sports Complex (1967), the Alameda Plaza Hotel (1971), and the Kansas City International Airport (1972), all in Kansas City, Missouri.[10] Kivett was the principal in charge of the KCI project.

Despite working in a broad spectrum of building types, the consistency of Kivett & Myers' designs expressed the firm's ideals. They were fully committed to a progressive aesthetic and to the tenets of Modernism, including innovation. The firm embraced new technologies, such as the curtain-wall system and lift-slab construction. Kivett & Myers designed each project to address the basic problems of function, structure, and enclosure.[11] The process of developing aesthetic solutions to universal problems brought clarity and consistency to their designs, even among various building types.[12]

Kivett & Myers embraced innovation in the design process as well as in the final outcome. They considered the architect as just one player in a design team that also included the contractor and the client. Kivett & Myers constantly fostered new talent, actively seeking the top graduates from area architecture schools, admitting they were hiring those who would one day become their competition. Their staff gained experience in all aspects of the design and construction process as they were assigned to a project from beginning to end. Kivett encouraged creativity and flexibility but also responsibility among his designers, ultimately instilling in many of them the confidence to start their own firms. Many Kivett & Myers alumni went on to start highly successful firms. Of the forty-six awards given by the Kansas City chapter of the American Institute of Architects (AIA) by 1993, forty went to alumni of the firm.

In the early 1970s, other Kansas City firms, including those founded by former employees, began to draw young talent away from Kivett & Myers and to emerge as formidable competitors. In 1975, Kivett & Myers merged with the engineering firm HNTB in order to achieve Myers' vision of participating in larger projects. Kivett retired at the time of the merger. Over the course of thirty years, Kivett & Myers won over 200 awards, thirty of which were given by the local AIA chapter.[13]

[10] Gose.
[11] Sachs, 10.
[12] Sachs, 13.
[13] Gose.

The extensive career of Clarence Kivett was recognized in 1982 at a ceremony celebrating the 125th anniversary of the AIA. They awarded Kivett the prestigious AIA Presidential Citation for his "significant role, work, contributions and influence in shaping modern architecture of the Midwest."[14] The vast collection of their work, both monumental buildings and minor projects, stands as a legacy to Kivett & Myers.

5. KEY INDUSTRY CHANGES

Around the time of the planning and design of the original KCI terminals, there were two major industry changes that almost immediately impacted the operational aspects of the originally conceived "drive-to-gate" terminal concept. The most immediate industry change was the need for the security screening of passengers before they could board their aircraft. The second significant change was the airline industries move toward a "hub and spoke" operating concept from a "point-to-point" that was brought about by escalating fuel prices and technological advances. The deregulation of the airline industry in 1978 added additional for airlines to consolidate and make their route structures more efficient which added increased emphasis on hubbing.

In the early 70's almost around the opening of the new terminals at KCI, the aviation industry experienced several airline hijackings. These events resulted in changes to security procedures that required the screening of passengers with metal detectors and in some cases physical separation of ticketed passengers from non-ticketed passengers in the terminal. The new security requirements were difficult to achieve in the new KCI terminals due to the limitation of design of the terminals. As a result, interior modifications were implemented to provide separate security screening locations for small groups of gates. In addition, glass walls were constructed to keep screened passengers from being able to receive items from non-screened passengers. The shallow depth of the terminal concourse from the gate to the front door of the terminal, which was a main feature in providing the "drive-to-the-gate" accessibility, became a significant challenge in the effort to insure safety and security of the passengers and the aircraft. While KCI does continue to have relatively short walking distances compared to other modern airport terminals, this convenience comes at a cost in terms of the need for additional screening facilities and personnel, the lack of adequate restrooms, restaurants, shopping, and lounges once a passenger has passed through security, and no efficient way for passengers or airlines to transfer between the three terminals, a crucial requirement for connecting passengers in an airlines hubbing operation.

The KCI "drive-to-gate" concept was an attempt to compensate for the increasing size of aircraft that begun to be manufactured during the 60's including the launch of the Boeing 747 in 1969. It was believed that B747's would be a significant aircraft in TWA's KCI operation. TWA was one of the first airlines in the world, after Delta Air Lines, to embrace the spoke-hub distribution paradigm and also was one of the first airlines to use the Boeing 747. It planned to use the 747 along with the

[14] Hoffman.

anticipated supersonic transport to whisk people between the West/Midwest (via Kansas City) and New York City (via John F. Kennedy International Airport) to European and other world destinations. As part of this strategy, TWA's hub airports were to be designed so that gates would be close to the street. However, the TWA-style airport of the future design proved impractical and costly when Cuban hijackings in the late 1960s, followed by more sinister and deadly Mideast hijackings, required central security checkpoints. TWA's gates, which were conceived of being within 100 feet of the terminal curb, were likewise to become obsolete because of security issues. Kansas City refused to rebuild its terminals as Dallas-Fort Worth International Airport rebuilt its similarly designed terminals, forcing TWA to look for a new hub. Missouri politicians moved to keep TWA in the state, and in 1982, TWA began a decade-long move to Lambert International Airport in St. Louis, Missouri.

6. COMPARABLE AIRPORT TERMINALS

As discussed above, the opening of the terminals at KCI were immediately followed by hijacking events that greatly altered planners thinking about security, which in turn resulted in the need for centralized security serving larger concourses with the ability to provide adequately sized passenger holdrooms, choices of food and beverage and retail concessions, and other services beyond security checkpoints. Additionally, the recession of the 1970's combined with escalating fuel costs forced the airlines to reevaluate their business operating model which ushered in the "hub and spoke" era which required that a "hub" airport terminal to efficiently move large volumes of connecting passengers between arriving and departing flights. As major airlines, like Trans World Airline transitioned to the "hubbing" operating principle in the late 70's, the "drive-to-gate" concept became obsolete for TWA's vision of a major airport in their route system since the three separate unit terminals were never designed to efficiently move connecting passengers and baggage.

The poured in-place concrete terminals at KCI with their two and four gate modules and narrow depth of only 75 feet were designed and constructed in such a manner that upgrades to efficiently deal with the airlines' operational changes and new security requirements were difficult. The result is that new passenger terminals built after the early 1970's moved away from the planning and design principles that were specifically incorporated into the KCI terminals because they were no longer compatible with current day thinking regarding passenger processing and security. However, there is one comparable passenger terminal in the US at Dallas/Fort Worth International Airport that was being designed and constructed at the same time as KCI's terminals and reflects similar design concepts in terms of passenger processing.

Dallas/Fort Worth, Texas (1973)[15]

Dallas/Fort Worth (DFW) Airport, opened less than a year after KCI, is the U.S. airport most similar to KCI. While in the planning stages since 1961, DFW was completely redesigned in 1968, when project manager Thomas Sullivan, hired Hellmuth, Obata & Kassabaum (HOK) to rethink the more-traditional linear concept laid out by Tippets-Abbett-McCarthy-Stratton (TAMS).[16] Gyo Obata consulted with Kivett & Myers about the drive-to-gate plan and developed a version for the huge new Texas airport that boasted a curb-to-gate distance of 120 feet. On an enormous 18,000 acre site, the airport plan featured a central roadway flanked by nine unit terminals. An access road from the central spine led into each semicircular unit. Each terminal had two passenger levels (versus one at KCI) and between 18 and 25 gate modules that could be assembled and reassembled to meet changing airline demands and aircraft needs. Planners anticipated 8 million passengers would use the airport in its first year, and up to 50 million would travel through DFW annually by 2001. The two-level plan accommodated the computer-driven people mover (similar to those used at Tampa) that looped around the facility, transporting up to 40 passengers at a time between terminals and to remote parking. The average ride between any two points at the airport was 11 minutes. Only five terminals (105 gates) of the nine planned opened in 1973; no additional terminals were constructed. At least one was replaced by a larger, centralized terminal. Some of the areas designated for additional terminal construction today provide surface parking.

[15] "Master planning: The necessary prelude, Dallas/Fort Worth Revised," *Architectural Record,* August 1970, 118-119; Molly Ivins, "A Texas-scale Airport," *the New York Times,* 16 September 1973, New York Times Article Archive, Online at http://nytimes.com/ref/membercenter/nytarchive.html .

[16] Ivins, "A Texas-scale Airport..."

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

www.dnr.mo.gov

July 16, 2013

Rob Adams
Landrum & Brown
11279 Cornell Park Drive
Cincinnati, Ohio 45242

Re: KCI Replacement Terminal, Kansas City (FAA) Jackson County, Missouri

Dear Mr. Adams:

Thank you for submitting information on the above referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.O. 89-665, as amended and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800, which require identification and evaluation of cultural resources.

We have reviewed the additional information provided concerning the above referenced project. Because the unique role the complex played in the history of commercial aviation in Kansas City and because of its unique and innovative design and also because of its association with a Kivett and Meyers, a prominent and award-winning Kansas City architectural firm, it is the opinion of the Missouri State Historic Preservation Office (SHPO) that Kansas City International Airport, Terminal A and B, is eligible for inclusion in the National Register of Historic Places. While we recognize that there have been alterations over time, we believe that it retains sufficient integrity for the complex to be eligible for listing under Criterion A in the area of significance for Transportation, Criterion C in the area of significance of Engineering, and that the property can meet the exceptional significance test under Criterion G..

Since this project involves the removal and replacement of an eligible property, the action will have an **adverse effect** on the historic fabric of the Kansas City International Airport. We recommend that a Memorandum of Agreement (MOA) be prepared that outlines the steps needed to mitigate the adverse effect for this project. Final stipulations in the MOA should be determined in consultation with the Federal agency, the City of Kansas City, our office, the Advisory Council, if participating, and any other interested parties.

It will be the responsibility of the Federal Aviation Administration, to forward the necessary adequate documentation, including project description, background information and correspondence with this office, to the Executive Director, Advisory Council on Historic Preservation, The Old Post Office Building, 1100 Pennsylvania Avenue NW, #809, Washington, DC 20004. Pending receipt of the Council's decision on whether it will participate in consultation, no action shall be taken which would foreclose Council consideration of alternatives to avoid or satisfactorily mitigate any adverse effect on the property in question.

If you have any questions, please write Judith Deel at State Historic Preservation Office, P.O. Box 176, Jefferson City, Missouri 65102 or call 573/751-7862.

Recycled Paper

Please be sure to include the SHPO Log Number (**007-PL-13**) on all future correspondence or inquiries relating to this project.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Mark A. Miles
Director and Deputy State
Historic Preservation Officer

MAM:jd

c Glenn Helm, FAA
Brad Wolf, KC

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

www.dnr.mo.gov

August 21, 2013

Rob Adams
Landrum & Brown
11279 Cornell Park Drive
Cincinnati, Ohio 45242

Re: KCI Replacement Terminal, Kansas City (FAA) Jackson County, Missouri

Dear Mr. Adams:

Thank you for submitting information on the above referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.O. 89-665, as amended and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800, which require identification and evaluation of cultural resources.

As had been requested in our meeting of August as4, 2013, enclosed please find an expanded Determination of Eligibility for the Kansas City International Airport. We look forward to the decision of the Federal Aviation Administration (FAA) regarding the eligibility of this property.

If you have any questions, please write Judith Deel at State Historic Preservation Office, P.O. Box 176, Jefferson City, Missouri 65102 or call 573/751-7862. Please be sure to include the SHPO Log Number (**007-PL-13**) on all future correspondence or inquiries relating to this project.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Mark A. Miles
Director and Deputy State
Historic Preservation Officer

MAM:jd

Enclosure: As Stated

c Mark Schenkleberg, FAA
Glenn Helm, FAA
Phil Muncy, Kansas City Aviation

Recycled Paper

Determination of Eligibility

Kansas City International Terminals Replacement Project
Project Number: 07PL13 County: Platte Agency: FAA

As part of our responsibilities under Section 106 of the National Historic Preservation Act of 1966, the Missouri State Historic Preservation Office (SHPO) was asked by consultants for the Federal Aviation Administration (FAA) to evaluate the potential eligibility of the KCI terminals for listing in the National Register of Historic Places. Section 106 requires that the impact of any federally funded or licensed undertaking be assessed on properties listed in or eligible for listing in the National Register of Historic Place. In the opinion of the SHPO staff, the KCI terminals are eligible for listing in the National Register of Historic Places under Criteria "A" and "C".

Significant under Criterion "A" Transportation" for its innovative "Drive-to- Gate" concept.

The events leading up to the construction of the KCI terminals reflect a dramatic change in the history of the air transportation industry. Commercial jet service began in earnest in the US with the introduction of the Boeing 707 and the Douglas DC8 in 1958. Throughout the 1960's innovations were on the drawing board that would greatly expand air service. The second generation wide-bodied jets such as the Boeing 747 (1969), the MD DC10 (1970) and the Lockheed L-1011 (1970) were being designed and placed in service. It was a time of tremendous optimism and growth for the industry and innovative designs to serve the needs of the travelling public became increasingly important. On April 7, 1967 TWA became one of the USA's first all-jet airlines with the retirement of their last Lockheed L-749A Constellation and L-1649 Starliner cargo aircraft. That morning throughout the TWA system, aircraft ground service personnel placed a booklet on every passenger seat titled "Props Are For Boats."

In 1966, Kansas City voters in a 24:1 margin approved a $150 million bond issue following a campaign by Mayor Ilus W. Davis to move the city's main airport to an expanded Mid-Continent Airport. This margin of support and the size and scale of the public investment evidences a high degree of civic pride in the endeavor. The city had considered building its new airport five miles (8 km) north of downtown Kansas City in the Missouri River bottoms, as well as locations in southern Jackson County, Missouri, but decided to stick with the property it already owned. The old terminals were demolished to make room for the current facilities, built in 1972. Kansas City architects Kivett and Myers designed the terminals and control tower. Many design decisions were driven by TWA, which envisioned that KCI would be its hub, with 747s and Supersonic Transports whisking people from America's heartland to all points on the globe. Streets around the airport included Mexico City Avenue, Brasília Avenue, Paris Street, London Avenue, and Tel Aviv Avenue.

TWA vetoed concepts to model the airport on Washington Dulles International Airport and Tampa International Airport, because those two airports had people movers which it deemed too expensive. TWA insisted on "Drive to Your Gate" with flight gates 75 feet (23 m) from the roadway (signs along the roadway showed the flights leaving each gate). The single-level terminals had no stairs. A similar layout was to be built at Dallas-Fort Worth International Airport.

KCI airport was dedicated on October 23, 1972, by US Vice President Spiro Agnew. Labor strife and interruptions raised its cost to $250 million. Kansas City renamed the airport Kansas City International

Airport reflecting the growing aspirations of the city as a more active player in aviation, both nationally and beyond .

It is worth noting that while many other airports around the country expanded or adapted existing facilities to respond to the changing character of air transportation in the 1960's, the Kansas City project was essentially an entirely new project starting with what was basically a blank canvas. As such, it must be seen as a bold and unified design expression reflecting the era and optimism of a rapidly growing and changing industry.

KCI passenger terminals have a unique structure comprising three terminals in the shape of rings. Each ring has short-term parking in the center of the ring. Thus, it is possible for travelers to park, walk no more than a hundred feet, and go directly to their gates. Arriving travelers can leave their gates, and walk immediately out of the terminal without passing through any corridors. The airport also has several off-site airport parking facilities. Slogans at the time of the bond issue were "The world's shortest walk to fly" and "Drive to your gate". Kansas City and the airlines have opted against any "people movers" connecting the three rings. Instead, frequent buses take passengers around the rings. Initially the bus cost 25 cents, but after an outcry by travelers the charge ended. It was the first airport in the country to embody this concept. (Dallas/Fort Worth) followed the next year. A similar design can be found at the Berlin-Tegel Airport and the Cologne Bonn Airport, both in Germany.

TWA's vision for the future of flight which had been pioneered by the TWA Flight Center at JFK Airport in New York City (which also featured cars close to the gates design) proved obsolete almost from the start. The terminals turned out to be unfriendly to the 747, since passengers spilled out of the gate area into the halls. When security checkpoints were added in the 1970s to stem hijackings, they were difficult and expensive to implement since security checkpoints had to be installed at each gate area rather than at a centralized area.

Significant under criterion C as an example of Brutalist architecture.

The geometric forms of the terminals and the textured concrete surfaces express the Brutalist architectural style. Drawing on the modernist architectural movement, the Brutalist architectural style flourished from the 1950's to the mid-1970s. Physical characteristics of Brutalist architecture include very linear, fortress like and blockish structures, often with a predominance of concrete construction. Initially the style came about for government building, low-rent housing and shopping centers to create functional structures at a low cost, but eventually designers adopted the look for other uses such as college buildings and other commercial facilities. The English architects Alison and Peter Smithson coined the term in 1953 from the French beton brut, or 'raw concrete" a phrase used by Le Corbusier to describe the poured board-marked concrete with which he constructed many of his post-World War II buildings. For the KCI terminals, the architects combined the light-colored concrete with ample glazing, high ceiling, and wood elements to help soften the interior of the cold look and feel of the exposed concrete structure. Characteristic features of the style can still be seen in the interior of the building which exhibit strong geometric forms. X-shaped columns on the landside of the terminal are legible outside and inside the building. The airside columns terminate in V-shaped tops that cant inward. The exposed ceiling inside the terminal reveals a honeycomb grid of members.

While Brutalist architecture may today be one of the singularly most unloved architectural styles, it is a clear expression of the times in which the building was designed and constructed and KCI is a

particularly fine example of the style. It is certainly one of the largest and most visible examples of the style in the Kansas City region.

Significant under criterion C for its association with Kivett and Myers.

KCI is the work of the prominent Kansas City firm of Kivett and Myers and specifically the work of Clarence Kivett as the architect of record for the KCI terminals. Kivitt and Myers was one of Kansas City's leading architectural firms in the years after World War II. The firm embraced the Modern Movement of architecture and the firm maintained a philosophy based on purity of form, structural express and technological innovation that resulted in a high degree of stylistic consistency. During the 1960's and 70's, Kivett & Myers received larger, more prominent commissions including schools, stadiums, banks and hospitals. The firm was also responsible for the Jackson County Sports Complex in Independence and the Alameda Plaza Hotel in Kansas City. The extensive career of Clarence Kivett was recognized in 1982 at a ceremony celebrating the 125th anniversary of the AIA. They awarded Kivett the prestigious AIA Presidential Citation for his "significant role, work, contributions and influence in shaping modern architecture of the Midwest." Kivett's extensive contribution to Kansas City's architectural landscape was significant and contributes greatly to the local significance of Kansas City International.

Fifty year standard—Criteria G consideration.

Concerns have been expressed about the age of the complex and that it is less than 50 years old. NPS notes: *The National Register Criteria for Evaluation encourage nomination of recently significant properties if they are of exceptional importance to a community, a State, a region, or the Nation. The criteria do not describe "exceptional," nor should they. Exceptional, by its own definition, cannot be fully catalogued or anticipated. It may reflect the extraordinary impact of a political or social event. It may apply to an entire category of resources so fragile that survivors of any age are unusual. It may be the function of the relative age of a community and its perceptions of old and new. It may be represented by a building or structure whose developmental or design value is quickly recognized as historically significant by the architectural or engineering profession. It may be reflected in a range of resources for which a community has an unusually strong associative attachment.*

It is worth noting that NPS, commenting specifically on aviation-related facilities makes the following point:

Given that airplanes and the infrastructure of aviation were not designed or constructed for fifty years of operation, Criteria Consideration G deserves special attention. Other aviation properties, like wartime training fields and temporary buildings, similarly were never intended to last fifty years. Without identification and preservation of some of these properties before they reach the age of fifty years, the properties will not survive to reach fifty years of age.

Other airport terminals have been listed in the Register, most notably, Dulles Airport in Virginia. The National Park Service has determined that the main terminal building at Dulles, a building designed by architect Eero Saarinen, is eligible for listing in the National Register because of the building's exceptional architectural importance and despite the fact that the building was not yet fifty years old at the time it was evaluated. The TWA Flight Center at JFK in New York was built in 1959 and was listed in 2005 when the building was 46 years old.

NPS guidance states the following:

Examples of Properties that DO NOT Need to Meet Criteria Consideration G: Properties that Have Achieved Significance Within the Past Fifty Years

- *A resource whose construction began over fifty years ago, but the completion overlaps the fifty year period by a few years or less.*
- *A resource that is significant for its plan or design, which is more than fifty years old, but the actual completion of the project overlaps the fifty year period by a few years.*

Any project the size and scale of KCI takes time to come to fruition. While construction of KCI was not completed until the end of 1972, conceptual planning for the building and design development of KCI began in the early 1960's with the majority of the design work taking place in the period of 1965-67. The airport, therefore, embodies a mid-sixties visionary viewpoint on the future of aviation and transportation.

In the Section 106 process, various interests come together to evaluate the impact of a proposed undertaking on properties listed or eligible for listing in the National Register of Historic Places. During this process the federal agencies play an advocacy role for the proposed undertaking. The federal Advisory Council on Historic Preservation plays an advocacy for the 106 process ensuring that all voices are heard and that procedural steps are followed. As part of their responsibilities under Section 106, SHPO's are directed to be advocates for potentially impacted historic resources.

There is also an implied direction that SHPO's include properties of local significance and be forward looking in their determinations of eligibility which may in fact be broader in scale and scope than the actual requirements for listing. (Architectural surveys, for example, frequently use a 40 year standard for eligibility as opposed to the 50 year threshold).

The 50 year threshold is NOT an iron-clad rule and a growing appreciation and understanding of mid-century modernist architecture has led to a greater number of listings of properties from this period. In Missouri, a growing number of resources less than 50 years old have been listed in the National Register including, the American Zinc Building in St. Louis, the BMI Tower in Kansas City, Park Central Square in Springfield, the Pet Food Building St. Louis, the TWA Headquarters Building in Kansas City to mention just a few.

Integrity Concerns

While the terminals haves undergone modifications since construction (specifically the 2004 Terminal Improvement Project), these alterations do not fundamentally change the design and spatial relationships of the complex, indeed the overall location, design, setting , workmanship, feeling and associations remain intact and the vast majority of the original character-defining materials remain intact, as well. Despite the latter alterations, it is the opinion of the SHPO that the essential character of the terminals remain intact.

Conclusion:

In the opinion of the SHPO, the KCI terminals are eligible for listing in the National Register of Historic Places under criteria A and C. If the federal agency concurs with this determination, it needs to consider the impact of the proposed undertaking on the historic resource as part of the Section 106 process.

Should the Federal Agency dispute the SHPO finding, the matter can be referred to the Keeper of the National Register of Historic Places for a final determination by the Keeper.

It is important to remember that Section 106 does not preclude demolition of any historic resource. It does ensure that alternatives to demolition are fully and fairly considered and that appropriate mitigation measures are taken prior to the irreversible step of demolition.

From: <glenn.helm@faa.gov>
Date: September 5, 2013, 6:08:14 PM EDT
To: <judith.deel@dnr.mo.gov>
Cc: <david_long@kcmo.org>, <mark.schenkelberg@faa.gov>, Mark VanLoh <Mark.VanLoh@kcmo.org>, <Phil_Muncy@kcmo.org>, <radams@landrum-brown.com>, <todd.madison@faa.gov>, <mark.miles@dnr.mo.gov>
Subject: Kansas City, MO (MCI) - Kansas City International Airport - Demolition of Existing Terminal Complex - Determination of Adverse Effect

Judith. We concur with you that the KCI terminals are eligible for listing in the National Register of Historic Places under Criteria A and C. The demolition of the terminal complex would be an adverse effect. We will coordinate a draft Memorandum of Agreement (MOA) with you to mitigate the adverse effect and invite the Advisory Council on Historic Preservation (ACHP) to participate in the consultation.

Glenn Helm, P.E.
Environmental Specialist
FAA, ACE-611F / 901 Locust St. / Kansas City, MO 64106-2325
Phone: 816-329-2617 / Fax: 816-329-2611
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U.S. Department
of Transportation

**Federal Aviation
Administration**

Central Region
Iowa, Kansas,
Missouri, Nebraska

901 Locust
Kansas City, Missouri 64106
(816) 329-2600

November 22, 2017

CERTIFIED MAIL

Dr. Toni M. Prawl
Director and Deputy State Historic Preservation Officer
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

Kansas City International Airport
Kansas City, Platte County, Missouri
Section 106 Coordination, SHPO Log Number 007-PL-13
Environmental Assessment for the Proposed Replacement Terminal Project

Dear Dr. Prawl:

In 2013, Section 106 consultation was initiated for the subject project but was not finalized pending a city referendum to construct a replacement terminal at the Kansas City International Airport (KCI). On November 7, 2017, the citizens of Kansas City overwhelmingly voted in favor of replacing the existing three terminals with a single terminal.

We wish to resume Section 106 consultation on this proposed project. An Environmental Assessment (EA) is being prepared to determine the potential environmental impacts of a proposed replacement terminal project at KCI as shown on **Exhibit 1, *Airport Location Map***.

This EA will investigate, analyze, and disclose any potential environmental impacts of the Proposed Project and its reasonable alternatives. The Federal Aviation Administration (FAA) is the lead agency and as such the document will be prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures* and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*.

Proposed Undertaking

The existing terminal facilities are considered functionally obsolete in regards to serving as the future terminal infrastructure through 2030 and beyond. The purpose of the proposed replacement terminal project is to reduce operational costs by reducing and eliminating operational inefficiencies while improving passenger processing and efficiency within the terminal and provide convenient roadways, public vehicle parking, and traffic flow for Airport users and vehicles. It is Kansas City's goal to provide a high level of air service, as well as a source of community pride for the city and the Metro Region in a cost-effective and affordable manner. The new terminal will incorporate the latest in passenger processing technology and achieve a balanced capacity of gates, terminal processing, and landside facilities.

The proposed project, occurring completely on airport owned property, includes the following major components which are shown on **Exhibit 2, *Proposed Project*:**

- Decommission and demolish existing Terminal A, including the terminal's parking garage;
- Construct up to a maximum of approximately 1,000,000 square foot of replacement terminal;
- Construct new terminal apron area and associated taxiway modifications;
- Decommission and demolish existing Terminal B and consolidate airline operations at the new replacement Terminal;
- Decommission and demolish existing Terminal C and consolidate airline operations at the new replacement Terminal;
- Realign or relocate FAA facilities, including but not limited to compound wall, roadways, vehicle parking, duct banks, and cable loop;
- Construct new six-level parking garage with approximately 6,600 spaces and a surface parking lot of approximately 2,400 spaces;
- Modify existing roadways and construct new roadways in the terminal area;
- Construct various storm water collection system improvements including improved glycol (de-icing) recovery system and facilities (Includes removal of one or two existing storm water ponds);
- Renovate existing Central Utility Plant (CPU) or construct replacement utility infrastructure including a new chilled water plant and approximately 32,000 square foot replacement CUP; and,
- Resurface and Rehabilitate Taxiways in the vicinity of the replacement terminal.

Area of Potential Effect

The undertaking would include ground disturbance and construction activities within the existing terminal complex as shown on **Exhibit 3, *Areas of Potential Effect***. The land uses within this area are made up of developed land used for Airport operations. Therefore, for direct impacts the area of potential disturbance was included in the APE.

For indirect impacts, such as impacts due to noise or changes in view, the APE was identified by first identifying historic properties near the Airport and then identifying the geographic area within which the undertaking may cause changes in the character or use of the historic properties. The most recent Airport noise study was used as the best available prediction of significant noise levels in the near term. The APE was drawn based on the 65 DNL from the noise study, but enlarged to take into account the potential increase in the area exposed to 65 DNL that could occur as a result of this undertaking. The APE for the undertaking, which takes into account potential for both direct and indirect impacts, is shown on Exhibit 3.

Identification of Historic Properties

In 2008, a cultural resources survey of the Airport was completed. The survey covered approximately 8,000 acres of land. Of all the cultural resources sites, sites 23PL1470 and 23PL1504 were identified as those that might meet NRHP eligibility and site 23PL1507 was identified as meeting NRHP eligibility criteria. These sites are listed in **Table 1, *Archaeology***

Site Summary and shown on Exhibit 3. The SHPO concurred with this determination, letter dated June 2, 2008.[1]

Table 1
ARCHAEOLOGY SITE SUMMARY
Kansas City International Airport

Identifier	Location	Description
23PL1470	West of existing Airport facilities.	Early stone house foundation retaining integrity
23PL1504	South of the existing Airport facilities.	The Davis Farmstead limestone basement foundation with steps, a cistern and well.
23PL1507	South of the existing Airport facilities.	Foundations of the Miller Plantation/Farm main house, a chimney on the east end and depressions that may be remains of outbuildings.

Source: Environmental Research Center of Missouri, Inc., *Cultural Resource Investigations: Phase I Survey, Kansas City International Airport Platte County Missouri,* April 2008.

An evaluation of historic properties also included Terminals A, B and C. The undertaking includes the demolition of these terminals which were opened in 1972. Previous consultation with the SHPO on September 5, 2013 concluded that the existing terminals are eligible for listing in the National Register of Historic Places under Criteria A and C as described in the attached ***Determination of Eligibility, Kansas City International Terminals Replacement Project***.

Assessment of Effect on Properties

Direct Impacts: There would be no direct impacts to historic sites 23PL1470, 23PL1504, and 23PL1507 due to the proposed undertaking. However, construction and operation of the proposed undertaking would result in direct impacts to Terminals A, B, and C through demolition of the historic structures. The FAA determined that there would be an "adverse effect" on Terminals A, B, and C. To mitigate the adverse effect, a Memorandum of Agreement (MOA) was in the process of being coordinated with the SHPO when the project was placed on hold in 2013 pending the public referendum.

Indirect Impacts: To determine potential indirect impacts on historic sites 23PL1470, 23PL1504, and 23PL1507, a noise assessment was conducted. The FAA's Land Use Compatibility Guidelines were used to determine the significance of potential impacts. The proposed undertaking would not result in significant increases of noise on the other historic sites. Furthermore, the view from the historic sites to the project area would remain what they are today- airport terminals. The undertaking would not alter the view of the historic sites from any current location. The undertaking would not introduce an atmospheric, audible, or visual feature to the area that would diminish the integrity of any property's setting or through transfer, sale, or lease, diminishes the long-term preservation of any property's historic significance that City ownership or control would otherwise ensure. There would be no indirect impacts by the

[1] Mark A. Miles, Director and Deputy State Historic Preservation Officer State of Missouri Department of Natural Resources letter to Judi O'Donnell Kansas City International Airport. Re: Phase I Survey, Kansas City International Airport, June 2, 2008.

proposed undertaking to these three historic sites. The FAA determined that there would be "no adverse effect" on historic sites 23PL1470, 23PL1504, and 23PL1507.

We would like to resume consultation on the proposed undertaking and setup a meeting with you and the Kansas City Aviation Department at your earliest convenience to discuss the undertaking, alternatives, mitigation, and next steps. If you would like additional information on this project, or would like to speak with me directly, please do not hesitate to contact me at (816) 329-2639 or scott.tener@faa.gov.

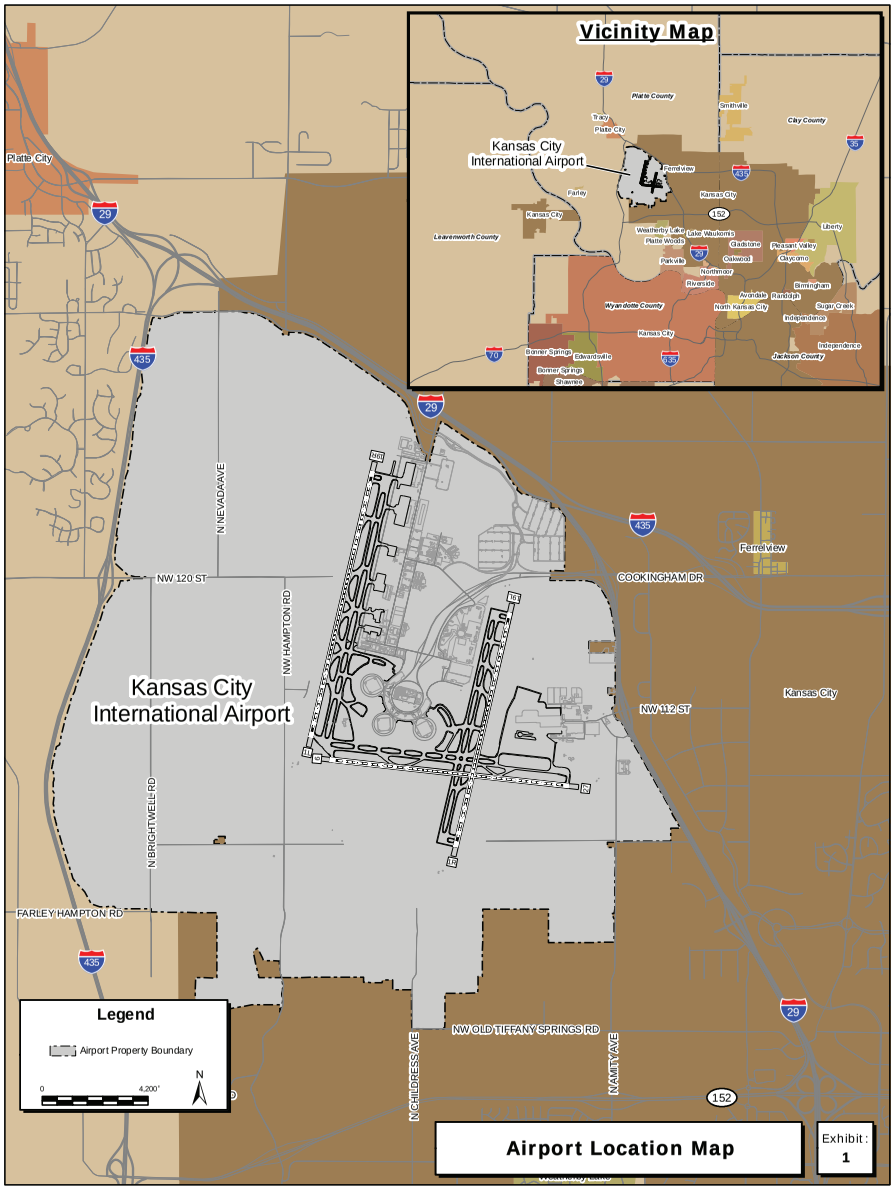
Sincerely,

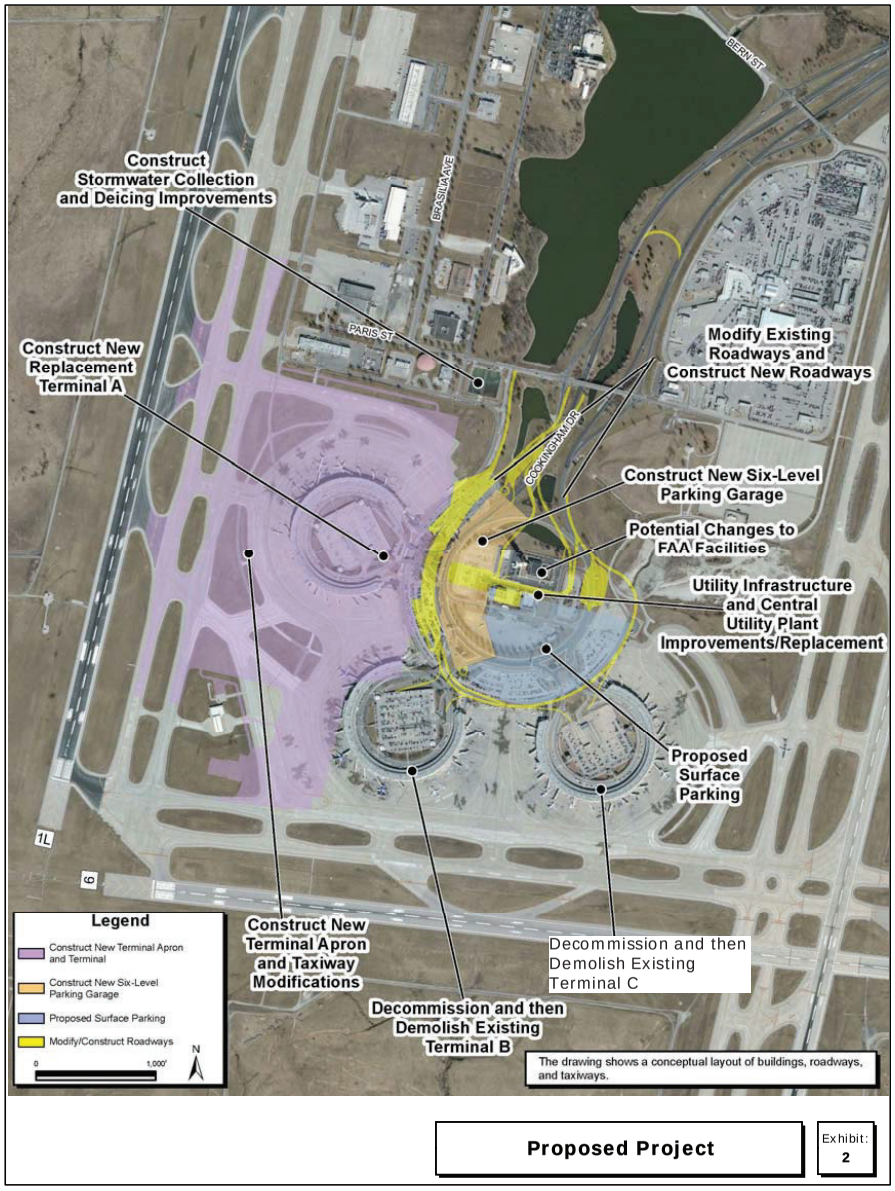
// Original signed //

Scott Tener, P.E.
Environmental Specialist

Enclosures

Cc: Jade Liska, Kansas City Aviation Department
Rob Adams, Landrum & Brown


Vicinity Map
Kansas City International Airport
Platte County
City County
Leavenworth County
Wyandotte County
Jackson County
Platte City
Ferrelview
Kansas City
Liberty
Independence
Kansas City International Airport
N NEVADA AVE
NW 120 ST
N HAMPTON RD
COOKINGHAM DR
NW 112 ST
N BRIGHTWELL RD
FARLEY HAMPTON RD
NW OLD TIFFANY SPRINGS RD
N CHILDRESS AVE
N AMITY AVE
Legend
Airport Property Boundary
0
4,200'
N
Airport Location Map
Exhibit: 1


Construct Stormwater Collection and Deicing Improvements
Construct New Replacement Terminal A
Modify Existing Roadways and Construct New Roadways
Construct New Six-Level Parking Garage
Potential Changes to FAA Facilities
Utility Infrastructure and Central Utility Plant Improvements/Replacement
Proposed Surface Parking
Construct New Terminal Apron and Taxiway Modifications
Decommission and then Demolish Existing Terminal C
Decommission and then Demolish Existing Terminal B
BRASILIA AVE
BERN ST
PARIS ST
COOKINGHAM DR
1L
9
Legend
Construct New Terminal Apron and Terminal
Construct New Six-Level Parking Garage
Proposed Surface Parking
Modify/Construct Roadways
0
1,000'
N
The drawing shows a conceptual layout of buildings, roadways, and taxiways.
Proposed Project
Exhibit: 2



Information contained in this exhibit relating to the nature and location of the archeological sites is considered confidential and not for public disclosure in accordance with Section 304 of the National Historic Preservation Act (54 USC § 307103; 36 CFR Part 800.6 (a)(5) of the advisory Council on Historic Preservation's rules implementing Sections 106 and 110 of the Act; and Section 9(a) of the Archeological Resources Protection Act (54 USC §100707).



Area of Potential Effect

Exhibit: 3

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Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Eric R. Greitens, Governor
Carol S. Comer, Director

DEC 1 9 2017

Mr. Scott Tener
Environmental Specialist
US Department of Transportation
Federal Aviation Administration
901 Locust
Kansas City, MO 64106

Re: SHPO Project Number: **007-PL-13** Environmental Assessment for the Proposed Replacement Terminal Project at Kansas City International Airport, Kansas City, Platte County, MO (FAA)

Dear Mr. Tener:

Thank you for submitting information about the above-referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (54 USC 306108) and the regulations implementing Section 106 at 36 CFR Part 800, which require identification and evaluation of cultural resources.

In previous consultation with our office it was determined that Terminals A, B, and C of Kansas City International Airport are eligible for listing on the National Register of Historic Places (NRHP) under Criterion A for Transportation and Criterion C for Architecture. Based on the information provided, and in accordance with the Advisory Council on Historic Preservation's regulation Protection of Historic Properties (36 CFR Part 800), Section 800.5, we concur that the demolition of the terminals will have an **adverse effect** on the NRHP-eligible resources. In addition, we have been contacted by concerned citizens regarding below-ground resources and recorded historic cemeteries within the area of potential effects (APE) which should be investigated in order to assess all foreseeable effects of the project. We look forward to receiving potential meeting dates for continuing consultation with the Federal Aviation Administration (FAA), concerned citizens, and other interested parties to develop a Memorandum of Agreement (MOA) that outlines the steps needed to mitigate the adverse effect for this undertaking.

At this time, and in accordance with 36 CFR Part 800.9, we recommend that the FAA send documentation on this project to the Executive Director, Advisory Council on Historic Preservation, the Old Post Office Building, 1100 Pennsylvania Avenue NW, #807, Washington, D.C 20004. Pending receipt of the Council's decision on whether it will participate in consultation, no action shall be taken which would foreclose Council consideration of alternatives to avoid or satisfactorily mitigate any adverse effect on the property in question. Please be sure to copy us on any correspondence to the ACHP.

If you have any questions please write Missouri Department of Natural Resources, State Historic Preservation Office, Attn: Review and Compliance, P.O. Box 176, Jefferson City, Missouri 65102, or call Amanda Burke (573) 522-4641.

Recycled paper

Please be sure to include the **SHPO Project Number (007-PL-13)** on all future correspondence relating to this project. If the information is provided via telephone call, please follow up in writing for our files.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Mike Sutherland
Deputy Director of Administration, Missouri State Parks and
Deputy Missouri State Historic Preservation Officer

MS:ab

c: Ms. Katherine Andrus, FAA

U.S. Department
of Transportation

**Federal Aviation
Administration**

Central Region
Iowa, Kansas,
Missouri, Nebraska

901 Locust
Kansas City, Missouri 64106
(816) 329-2600

December 27, 2017

CERTIFIED MAIL

<NAME> (See List)
<ADRESS>

Section 106 Coordination
Environmental Assessment for Proposed Replacement Terminal Project
Kansas City International Airport
Kansas City, Platte County, Missouri

Dear <NAME>:

In 2013, An Environmental Assessment (EA) was initiated for the subject project, but was not finalized pending a city referendum to construct a replacement terminal at the Kansas City International Airport (KCI). On November 7, 2017, the citizens of Kansas City overwhelmingly voted in favor of replacing the existing three terminals with a single terminal. An Environmental Assessment (EA) is being prepared to determine the potential environmental impacts of a proposed replacement terminal project at KCI as shown on **Exhibit 1, *Airport Location Map***.

Associated with the 2013 EA, Section 106 tribal coordination was completed. Given that four years have past since this initial coordination, we wish to recoordinate this proposed project with you. The intent of this letter is to request your input on properties of cultural or religious significance that may be affected by the proposed project and invite you to participate in the Section 106 consultation process.

The Federal Aviation Administration (FAA) is the lead agency and as such the document will be prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures* and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions.* Jim Johnson, FAA Central Region Airports Division Manager, will be making the final FAA decision on the EA.

Proposed Undertaking

The existing terminal facilities are considered functionally obsolete in regards to serving as the future terminal infrastructure through 2030 and beyond. The purpose of the proposed replacement terminal project is to reduce operational costs by reducing and eliminating operational inefficiencies while improving passenger processing and efficiency within the terminal and provide convenient roadways, public vehicle parking, and traffic flow for Airport users and vehicles. It is Kansas City's goal to provide a high level of air service, as well as a source of community pride for the city and the Metro Region in a cost-effective and affordable manner. The new terminal will incorporate the latest in passenger processing technology and achieve a balanced capacity of gates, terminal processing, and landside facilities.

The proposed project, occurring completely on airport owned property within the existing terminal complex, includes the following major components which are shown on **Exhibit 2, *Proposed Project*:**

- Decommission and demolish existing Terminal A, including the terminal's parking garage;
- Construct up to a maximum of approximately 1,000,000 square foot of replacement terminal;
- Construct new terminal apron area and associated taxiway modifications;
- Decommission and demolish existing Terminal B and consolidate airline operations at the new replacement Terminal;
- Decommission and demolish existing Terminal C and consolidate airline operations at the new replacement Terminal;
- Realign or relocate FAA facilities, including but not limited to compound wall, roadways, vehicle parking, duct banks, and cable loop;
- Construct new parking garage with approximately 6,600 spaces and a surface parking lot of approximately 2,400 spaces;
- Modify existing roadways and construct new roadways in the terminal area;
- Construct various storm water collection system improvements including improved glycol (de-icing) recovery system and facilities (Includes removal of one or two existing storm water ponds);
- Renovate existing Central Utility Plant (CUP) or construct replacement utility infrastructure including a new chilled water plant and approximately 32,000 square foot replacement CUP; and,
- Resurface and Rehabilitate Taxiways in the vicinity of the replacement terminal.

Area of Potential Effect

The undertaking would include ground disturbance and construction activities within the existing terminal complex as shown on **Exhibit 3, *Areas of Potential Effect***. The land uses within this area are made up of developed land used for Airport operations. Therefore, for direct impacts the area of potential disturbance was included in the APE.

For indirect impacts, such as impacts due to noise or changes in view, the APE was identified by first identifying historic properties near the Airport and then identifying the geographic area within which the undertaking may cause changes in the character or use of the historic properties. The most recent Airport noise study was used as the best available prediction of significant noise levels in the near term. The APE was drawn based on the 65 DNL from the noise study, but enlarged to take into account the potential increase in the area exposed to 65 DNL that could occur as a result of this undertaking. The APE for the undertaking, which takes into account potential for both direct and indirect impacts, is shown on Exhibit 3.

Identification of Historic Properties

In 2008, a cultural resources survey of the Airport was completed. The survey covered approximately 8,000 acres of land. Of all the cultural resources sites, sites 23PL1470 and 23PL1504 were identified as those that might meet NRHP eligibility and site 23PL1507 was

identified as meeting NRHP eligibility criteria. These sites are listed in **Table 1, *Archaeology Site Summary*** and shown on Exhibit 3. The SHPO concurred with this determination, letter dated June 2, 2008.[1]

Table 1
ARCHAEOLOGY SITE SUMMARY
Kansas City International Airport

Identifier	Location	Description
23PL1470	West of existing Airport facilities.	Early stone house foundation retaining integrity
23PL1504	South of the existing Airport facilities.	The Davis Farmstead limestone basement foundation with steps, a cistern and well.
23PL1507	South of the existing Airport facilities.	Foundations of the Miller Plantation/Farm main house, a chimney on the east end and depressions that may be remains of outbuildings.

Source: Environmental Research Center of Missouri, Inc., *Cultural Resource Investigations: Phase I Survey, Kansas City International Airport Platte County Missouri,* April 2008.

An evaluation of historic properties also included Terminals A, B and C. The undertaking includes the demolition of these terminals which were opened in 1972. Previous consultation with the SHPO on September 5, 2013 concluded that the existing terminals are eligible for listing in the National Register of Historic Places under Criteria A and C as described in the attached ***Determination of Eligibility, Kansas City International Terminals Replacement Project***.

Assessment of Effect on Properties

Anticipated Direct Impacts: There would be no direct impacts to historic sites 23PL1470, 23PL1504, and 23PL1507 due to the proposed undertaking. However, construction and operation of the proposed undertaking would result in direct impacts to Terminals A, B, and C through demolition of the historic structures. The FAA determined that there would be an "adverse effect" on Terminals A, B, and C. To mitigate the adverse effect, a Memorandum of Agreement (MOA) was in the process of being coordinated with the SHPO when the project was placed on hold in 2013 pending the public referendum.

Anticipated Indirect Impacts: To determine potential indirect impacts on historic sites 23PL1470, 23PL1504, and 23PL1507, a noise assessment was conducted. The FAA's Land Use Compatibility Guidelines were used to determine the significance of potential impacts. The proposed undertaking would not result in significant increases of noise on the other historic sites. Furthermore, the view from the historic sites to the project area would remain what they are today- airport terminals. The undertaking is not anticipated to alter the view of the historic sites from any current location. The undertaking is not anticipated to introduce an atmospheric, audible, or visual feature to the area that would diminish the integrity of any property's setting or through transfer, sale, or lease, diminishes the long-term preservation of any property's historic

[1] Mark A. Miles, Director and Deputy State Historic Preservation Officer State of Missouri Department of Natural Resources letter to Judi O'Donnell Kansas City International Airport. Re: Phase I Survey, Kansas City International Airport, June 2, 2008.

significance that City ownership or control would otherwise ensure. There would be no indirect impacts by the proposed undertaking to these three historic sites. The FAA determined that there would be "no adverse effect" on historic sites 23PL1470, 23PL1504, and 23PL1507.

To help in our preparation of the EA, we would appreciate your input (via mail or e-mail) within thirty (30) days. If you have questions or require additional information, please contact me at 816-329-2639 or scott.tener@faa.gov.

Sincerely,

Scott Tener, P.E.
Environmental Specialist

Enclosures

Tribal Coordination – Environmental Assessment 12/27/2017
Kansas City International Airport
Kansas City; Platte County; Missouri

Contact	Delivered (Cert Mail)	Response Returned	Action Requested
Ms. Bobi Roush Cultural Preservation Department Iowa Tribe of Oklahoma 335588 E 750 Road Perkins, OK 74059	(5890) 1/3/18		
Ms. Crystal Douglas Historic Preservation Officer Kaw Nation P.O. Box 50 Kaw City, OK 74641	(5906) 1/2/18		
Ms. Diane Hunter Tribal Historic Preservation Officer Miami Tribe of Oklahoma P.O. Box 1326 Miami, OK 74355	(5913) 1/4/18		
Mr. Tony Provost Tribal Historic Preservation Officer Omaha Tribe P.O. Box 368 Macy, NE 68039	(5920) 1/5/18		
Dr. Andrea Hunter Director, THPO Osage Nation 627 Grandview Pawhuska, OK 74056	(5784) 1/3/18		
Mr. Shannon Wright Tribal Historic Preservation Officer Ponca Tribe of Nebraska PO BOX 288 Niobrara NE 68760	(5937) 1/8/18		
Mr. Kip Spotted Eagle Tribal Historic Preservation Officer Yankton Sioux Tribe of South Dakota P.O. Box 1153 Wagner, SD 57380-1153	(5944) 1/10/18		

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Background

In 2013, the Kansas City Aviation Department (KCAD) began to prepare an Environmental Assessment (EA) for the replacement terminal project at Kansas City International Airport (KCI).

Preliminary coordination was initiated with various regulatory agencies. However, the EA was stopped to conduct further planning studies.

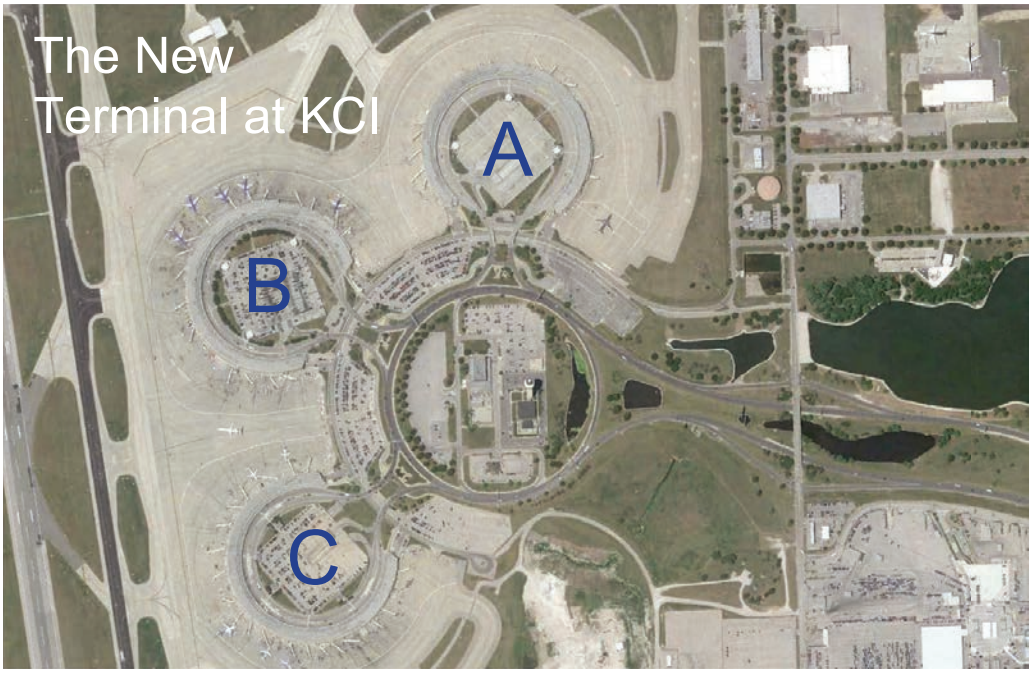
On November 7, 2017 Kansas City voters approved with 75.3% of the vote the construction of a new passenger terminal and demolition of the existing terminals. Therefore at this time KCAD is restarting the EA.

Kansas City
International Airport

Proposed Terminal
Replacement Project

Environmental Assessment Start Up

January 4, 2018



Previous Coordination with SHPO

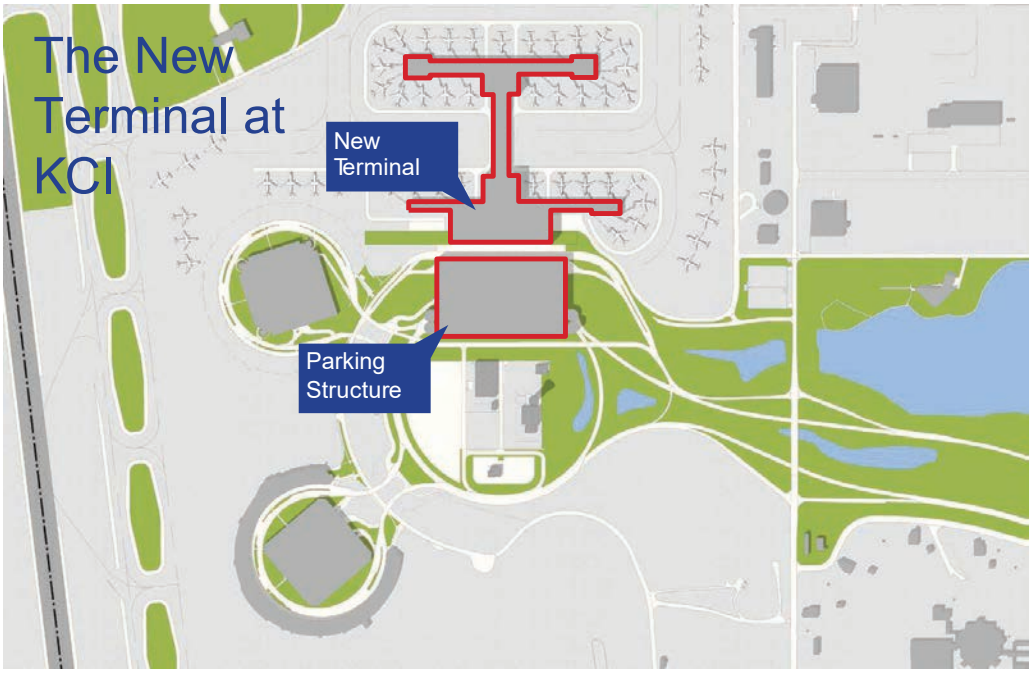
In 2013, an evaluation of the eligibility of the existing passenger terminals at KCI for the National Register of Historic Places (NRHP) was conducted.

- FAA made preliminary determination that the passenger terminals were not eligible for the NRHP. In accordance with the National Historic Preservation Act (NHPA), the FAA submitted that determination to the Missouri Department of Natural Resources which serves as the State Historic Preservation Office (SHPO) for Missouri. (Letter dated February 6, 2013)

- SHPO did not concur with the determination and made their own determination that the terminals were eligible for the NRHP and the action would have an adverse effect. (Letter dated July 16, 2013 Project Number 07PL13)

- FAA then concurred with the SHPO's determination and indicated willingness to begin the formal Section 106 process. (Email dated September 5, 2013)

The New Terminal at KCI



The New Terminal at KCI



Proposed Action (*continued*)

- Construct new parking garage and a surface parking lot
- Modify existing roadways and construct new roadways in the terminal core area
- Construct various storm water collection system improvements
- Renovate existing Central Utility Plant (CUP) or construct replacement utility infrastructure
- Potential Resurface and Rehabilitate the taxiways in the vicinity of the replacement terminal

Proposed Action

- Decommission and demolish existing Terminal A, including the Terminal A parking garage and aircraft apron
- Decommission and demolish existing Terminal B and Terminal C and consolidate airline operations at the new replacement Terminal
  - Terminal B and C will remain open during construction of new terminal
- Construct new replacement terminal
- Construct new terminal apron area around replacement terminal
- Realign or relocate FAA facilities, including but not limited to, the FAA compound wall, roadways leading to the FAA facility, FAA vehicle parking, duct banks, and cable loop

Purpose and Need

The *need* to reduce operational costs by reducing and eliminating operational inefficiencies.

- Terminal B and C would be demolished in order to eliminate the cost of maintaining and securing these separate terminals.
- For Terminal C utility connections and access roads would have to be reconnected and rebuilt. This would be a costly undertaking for a facility that will not be used.
- Terminal C would have no aeronautical use after the construction and implementation of the Proposed Action, however the land area where Terminal C sits would have aeronautical use.

Purpose and Need

The *need* to replace the existing terminal facilities which are considered functionally obsolete in regards to serving as the future terminal infrastructure through 2030 and beyond.

- There was extensive multi-year process reviewing need to renovate or replace terminals.
- Exhibit K Agreement involved a collaborative process between the Airlines serving KCI and KCAD. Airlines do not support any other terminal alternative.
- It was determined extensive modifications would be needed to convert the existing terminal into an efficient operating terminal complex. This would not be cost-effective when compared to building a new terminal.
- A new terminal would incorporate:
  - new technologies including updated passenger processing, bag self-tagging, and check-in
  - passenger amenities like adequately sized restrooms beyond security and better concession program
  - more environmentally friendly building design with new efficient mechanical, electrical, and plumbing systems
  - new underground utility feeds
  - ADA compliant

New Terminal Site Alternatives



Initial Alternatives

Remodel existing terminals

Build new terminal:

Site A - The existing Terminal A site in the central terminal area

Site C/D - The existing Terminal C/D site in the central terminal area

South Greenfield Site - Located between Runway 9/27 and State Highway 152 as identified in the 2008 Master Plan Update

Environmental Resources to be assessed in the EA

- Air Quality
- Biological Resources
- Climate
- Department of Transportation Act, Section 4(f) Resources
- Hazardous Materials, Solid Waste, and Pollution Prevention
- ***Historical, Architectural, Archeological, and Cultural Resources***
- Land Use
- Natural Resources and Energy Supply
- Noise and Noise-Compatible Land Use
- Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks
- Visual Effects
- Water Resources (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers)
- Cumulative Impacts

Alternatives

No Action
- Will be carried forward for analysis in the EA as a requirement of NEPA

Site A
- Would allow for the replacement of the three existing terminals into one new replacement terminal
- Would comply with FAA standards and design criteria
- Would maintain efficient airside and landside operations with minimal impacts to roads and utilities
- Site A was carried forward for detailed environmental study in the EA

Site C/D
- Would be situated away from the majority of the terminal support facilities
- Would cause the need to construct temporary Federal Inspection Services (FIS) in either Terminal A or Terminal B adding additional expense and operational inefficiencies
- Would require extensive fill in order to maintain appropriate grades at the apron and terminal
- Would limit the potential expansion area for the current Consolidated Rental Car facilities
- Determined not to be feasible or prudent because it would not maintain efficient airside and landside operations and would cause increased costs for utilities and roadway system

South Greenfield Site
- Would require significant improvements, including: new utility feeds; new entrance roads and a highway interchange, airside expansion including new parallel taxiways to Runway 9/27; and connectivity back to the existing terminal core in the form of a roadway tunnel connecting the South Site to the existing terminal core
- Would cause destruction of natural resources including wetlands, streams, and natural vegetated habitat
- Determined not to be feasible or prudent due to additional cost of utility infrastructure, additional roadways, and tunnel needed to access greenfield site and because it would not maintain efficient airside and landside operations

Archaeological Sites in APE

Identifier	Location	Description
23PL1470	West of existing Airport facilities	Early stone house foundation retaining integrity
23PL1504	South of the existing Airport facilities	The Davis Farmstead limestone basement foundation with steps, a cistern and well
23PL1507	South of the existing Airport facilities	Foundations of the Miller Plantation/Farm main house, a chimney on the east end and depressions that may be remains of outbuildings

Source: Environmental Research Center of Missouri, Inc., *Cultural Resource Investigations: Phase I Survey, Kansas City International Airport Platte County Missouri,* April 2008.

Historical, Architectural, Archeological, and Cultural Resources: Archaeologic Sites in Area of Potential Effe (APE)

APE based on areas of potentia construction activities (direct impacts) and previous noise studies (indirect impacts)



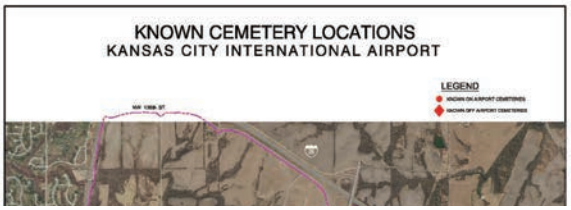
Information contained in this exhibit relating to the nature and location of the archeological sites is considered confidential and not for public disclosure in accordance with Section 304 of the National Historic Preservation Act (54 USC § 307103; 36 CFR Part 800.6 (a)(5) of the advisory Council on Historic Preservation's rules implementing Sections 106 and 110 of the Act; and Section 9(a) of the Archeological Resources Protection Act (54 USC §100707).



Three archaeological sites are *within* the APE (area where direct and indirect impacts *may occur)*

No new sites have been identified within the APE since 2013

Known Cemeteries and Off Airp Property



Information contained in this exhibit relating to the nature and location of the archeological sites is considered confidential and not for public disclosure in accordance with Section 304 of the National Historic Preservation Act (54 USC § 307103; 36 CFR Part 800.6 (a)(5) of the advisory Council on Historic Preservation's rules implementing Sections 106 and 110 of the Act; and Section 9(a) of the Archeological Resources Protection Act (54 USC §100707).



Other Potential Historic Impacts

Other Known Historic Resources

- None of the three identified archaeological sites will be directly impacted by the Proposed Action.
- No other known historic properties are present in the APE.

Cemetaries/Burial Sites

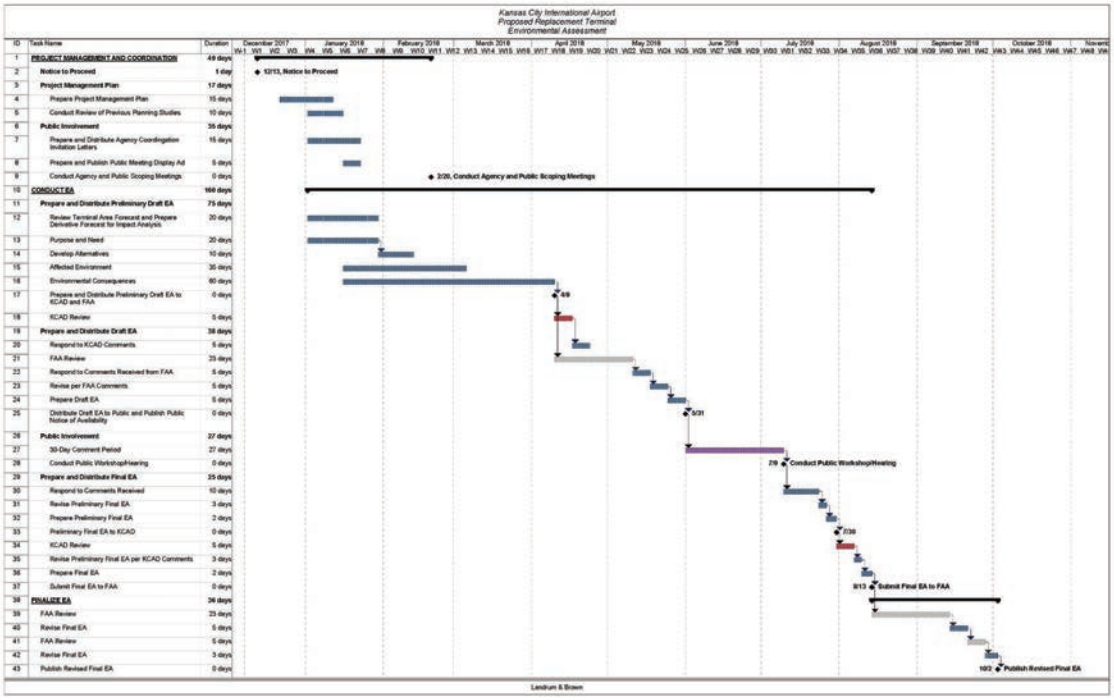
- There are known cemeteries On and Off Airport property. None of these sites will be will be directly impacted by the Proposed Action.
- KCAD and FAA have received information regarding prior landowners of current airport property and the potential for unmarked graves.
- Because no records were kept of specific burials or locations of burials, it is impossible to know where and how many burial sites may be present within the APE for the Proposed Action.
- Majority of the area for potential direct impacts has been previously disturbed.
- If previously unidentified cultural materials or human remains are encountered during construction, work shall cease immediately at that location, and the FAA and SHPO will be notified as soon as possible to determine the appropriate course of action.

EA Next Steps

- Development of Memorandum of Agreement with SHPO
- Conduct agency and public scoping meetings to request input on specific issues of concern
- Prepare Draft EA documenting potential indirect and direct environmental impacts

Avoidance/Minimization of Impacts

- The project would include measures to minimize impacts to historic terminals.
  - Terminal B and C will remain open and untouched during construction, giving time to collect further information and create a permanent record of their existence.



Schedule

- Conduct Agency and Public Scoping Meetings – *February/March 2018*
- Publish EA Draft document – *May/June 2018*
- Public Hearing and Workshop – *July 2018*
- Final EA – *Fall 2018*
- FAA issues its finding– *Fall/Winter 2018*













From: Tener, Scott (FAA)
Sent: Friday, January 12, 2018 2:01 PM
To: 'e106@achp.gov' <e106@achp.gov>
Subject: ACHP e106: Proposed Terminal Replacement Project; Kansas City International Airport, Platte County, Missouri

Please see attached:

- e106 Form
- SHPO and Tribe restart coordination letters and attachments-2017
- Response Letters from SHPO- 2008, 2013, 2017
- FAA Determination of adverse effect to terminals-2013
- KCI Terminals Determination of Eligibility from SHPO-2013
- Misc-KCI Replacement Terminal EA_SHPO Coordination-2017

Please let me know if you have any questions,

Scott Tener, P.E.
Environmental Specialist
FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
http://www.faa.gov/airports/central/

Preserving America's Heritage

Advisory Council on Historic Preservation
Electronic Section 106 Documentation Submittal System (*e*106) Form
MS Word format

Send to: *e106@achp.gov*

I. Basic information

1. **Name of federal agency** (If multiple agencies, state them all and indicate whether one is the lead agency):

   Federal Aviation Administration

2. **Name of undertaking/project** (Include project/permit/application number if applicable):

   Proposed Terminal Replacement Project

3. **Location of undertaking** (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

   The proposed terminal replacement project is located on airport owned property within the existing terminal area at the Kansas City International Airport, Kansas City, Platte County, Missouri.

4. **Name and title of federal agency official and contact person for this undertaking**, including email address and phone number:

   Agency Official:
   Jim Johnson, Manager, Airports Division

   Agency Contact Person:
   Scott Tener, P.E., Environmental Specialist
   FAA Central Region Airports Division
   901 Locust St., Room 364
   Kansas City, Missouri 64106-2325
   T 816.329.2639 | F 816.329.2611
   scott.tener@faa.gov

5. Purpose of notification. Indicate whether this documentation is to:

- notify the ACHP of a finding that an undertaking may adversely affect historic properties, and/or
- invite the ACHP to participate in a Section 106 consultation, and/or
- propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3).

II. Information on the Undertaking*

6. Describe the undertaking and nature of federal involvement (if multiple federal agencies are involved, specify involvement of each):

The City of Kansas City is proposing to replace the existing three-terminal facility (Terminals A, B, and C) with a single terminal facility. On November 7, 2017, the citizens of Kansas City overwhelmingly voted in favor of replacing the existing three terminals with a single terminal.

The existing terminal facilities are considered functionally obsolete in regards to serving as the future terminal infrastructure through 2030 and beyond. The purpose of the proposed replacement terminal project is to reduce operational costs by reducing and eliminating operational inefficiencies while improving passenger processing and efficiency within the terminal and provide convenient roadways, public vehicle parking, and traffic flow for Airport users and vehicles. It is Kansas City's goal to provide a high level of air service, as well as a source of community pride for the city and the Metro Region in a cost-effective and affordable manner. The new terminal will incorporate the latest in passenger processing technology and achieve a balanced capacity of gates, terminal processing, and landside facilities.

The proposed project, occurring completely on airport owned property, includes the following major components which are shown on **Exhibit 2, *Proposed Project*:**

- Decommission and demolish existing Terminal A, including the terminal's parking garage;
- Construct up to a maximum of approximately 1,000,000 square foot of replacement terminal;
- Construct new terminal apron area and associated taxiway modifications;
- Decommission and demolish existing Terminal B and consolidate airline operations at the new replacement Terminal;
- Decommission and demolish existing Terminal C and consolidate airline operations at the new replacement Terminal;
- Realign or relocate FAA facilities, including but not limited to compound wall, roadways, vehicle parking, duct banks, and cable loop;
- Construct new parking garage with approximately 6,600 spaces and a surface parking lot of approximately 2,400 spaces;
- Modify existing roadways and construct new roadways in the terminal area;

- Construct various storm water collection system improvements including improved glycol (de-icing) recovery system and facilities (Includes removal of one or two existing storm water ponds);
- Renovate existing Central Utility Plant (CPU) or construct replacement utility infrastructure including a new chilled water plant and approximately 32,000 square foot replacement CUP; and,
- Resurface and Rehabilitate Taxiways in the vicinity of the replacement terminal.

The proposed site and surrounding land use is currently used for airport operations.

An Environmental Assessment (EA) is being conducted on this project. This EA will investigate, analyze, and disclose any potential environmental impacts of the Proposed Project and its reasonable alternatives. The Federal Aviation Administration (FAA) is the lead agency and as such the document will be prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures* and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*.

7. Describe the Area of Potential Effects:

The undertaking would include ground disturbance and construction activities within the existing terminal complex as shown on **Exhibit 3, *Areas of Potential Effect***. The land uses within this area are made up of developed land used for Airport operations. Therefore, for direct impacts the area of potential disturbance was included in the APE.

For indirect impacts, such as impacts due to noise or changes in view, the APE was identified by first identifying historic properties near the Airport and then identifying the geographic area within which the undertaking may cause changes in the character or use of the historic properties. The most recent Airport noise study was used as the best available prediction of significant noise levels in the near term. The APE was drawn based on the 65 DNL from the noise study, but enlarged to take into account the potential increase in the area exposed to 65 DNL that could occur as a result of this undertaking. The APE for the undertaking, which takes into account potential for both direct and indirect impacts, is shown on Exhibit 3.

8. Describe steps taken to identify historic properties:

In 2008, a cultural resources survey of the Airport was completed. The survey covered approximately 8,000 acres of land. Of all the cultural resources sites, sites 23PL1470 and 23PL1504 were identified as those that might meet NRHP eligibility and site 23PL1507 was identified as meeting NRHP eligibility criteria. These sites are listed below and shown on Exhibit 3. The SHPO concurred with this determination, letter dated June 2, 2008.

An evaluation of historic properties also included Terminals A, B and C. The undertaking includes the demolition of these terminals which were opened in 1972. Previous consultation with the SHPO on September 5, 2013 concluded that the existing terminals are eligible for listing in the National Register of Historic Places under Criteria A and C as described in the attached *Determination of Eligibility, Kansas City International Terminals Replacement Project*.

9. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):

Identifier	Location	Description
23PL1470	West of existing Airport facilities.	Early stone house foundation retaining integrity
23PL1504	South of the existing Airport facilities.	The Davis Farmstead limestone basement foundation with steps, a cistern and well.
23PL1507	South of the existing Airport facilities.	Foundations of the Miller Plantation/Farm main house, a chimney on the east end and depressions that may be remains of outbuildings.
Terminals A, B, C	Within the existing Airport facilities.	Three semi-circular buildings of Brutalist architectural style constructed in 1972. Terminals B and C are currently being used for airport passenger operations. Terminal A is closed and not in use.

10. Describe the undertaking's effects on historic properties:

Direct Impacts: There would be no direct impacts to historic sites 23PL1470, 23PL1504, and 23PL1507 due to the proposed undertaking. However, construction and operation of the proposed undertaking would result in direct impacts to Terminals A, B, and C through demolition of the historic structures. The FAA determined that there would be an "adverse effect" on Terminals A, B, and C. To mitigate the adverse effect, a Memorandum of Agreement (MOA) will be coordinated with the SHPO.

Indirect Impacts: To determine potential indirect impacts on historic sites 23PL1470, 23PL1504, and 23PL1507, a noise assessment was conducted. The FAA's Land Use Compatibility Guidelines were used to determine the significance of potential impacts. The proposed undertaking would not result in significant increases of noise on the other historic sites. Furthermore, the view from the historic sites to the project area would remain what they are today- airport terminals. The undertaking would not alter the view of the historic sites from any current location. The undertaking would not introduce an atmospheric, audible, or visual feature to the area that would diminish the integrity of any property's setting or through transfer, sale, or lease, diminishes the long-term preservation of any property's historic significance that City ownership or control would otherwise ensure. There would be no indirect impacts by the proposed undertaking to these three historic sites. The FAA determined that there would be "no adverse effect" on historic sites 23PL1470, 23PL1504, and 23PL1507.

11. Explain how this undertaking would adversely affect historic properties (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

Construction and operation of the proposed undertaking would result in adverse effects to Terminals A, B, and C through demolition of the historic structures. To mitigate the adverse effect, a Memorandum of Agreement (MOA) will be coordinated with the SHPO.

12. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawai'ian organizations, or the public, including any correspondence from the SHPO and/or THPO.

In 2013, Section 106 consultation was initiated for the subject project but was not finalized pending a city referendum to construct a replacement terminal at the Kansas City International Airport (KCI). On November 7, 2017, the citizens of Kansas City overwhelmingly voted in favor of replacing the existing three terminals with a single terminal. At that time, a Memorandum of Agreement (MOA) was in the process of being coordinated with the SHPO when the project was placed on hold pending the public referendum. Subsequent to this referendum, consultation was reinitiated with the Missouri SHPO on November 22, 2017. The SHPO responded with the attached letter acknowledging the adverse effect to the terminals and requesting the ACHP be notified. Consultation with the SHPO is currently in process.

Also in 2013, the FAA provided opportunity for six tribes to consult on the undertaking's potential to affect properties with religious and cultural significance; Iowa Tribe of Oklahoma, Kaw Nation, Miami Tribe of Oklahoma, Omaha Tribe, Osage Nation, and the Yankton Sioux Tribe of South Dakota. Only one response was received from the Osage Nation requesting to review the draft EA. Subsequent to the November 7, 2017 public referendum, consultation was reinitiated with the tribes on December 27, 2017 to include the Ponca Tribe of Nebraska in addition to the six tribes listed above. To date we have not received any responses from the tribes.

Through consultation with the SHPO, local interest will be solicited to include in Section 106 consultation. The public will also have opportunity to provide comments through the EA process.

* see *Instructions for Completing the ACHP e106 Form*

III. Optional Information

13. Please indicate the status of any consultation that has occurred to date. Are there any consulting parties involved other than the SHPO/THPO? Are there any outstanding or unresolved concerns or issues that the ACHP should know about in deciding whether to participate in consultation?

Consolation between the Iowa SHPO, Kansas City, and FAA are in process. Through consultation with the SHPO, local interest will be solicited to include in Section 106 consultation. The public will also have opportunity to provide comments through the EA process.

14. Does your agency have a website or website link where the interested public can find out about this project and/or provide comments? Please provide relevant links:

All of the Terminal Master Plans and process with City Council presentations and documents associated with the new terminal development are listed on the page as links…

http://www.flykci.com/newsroom/terminal-master-plan/

15. Is this undertaking considered a "major" or "covered" project listed on the Federal Infrastructure Projects Permitting Dashboard or other federal interagency project tracking system? If so, please provide the link or reference number:

This project is considered covered, but has not been entered yet.

The following are attached to this form (check all that apply):

_X__ Section 106 consultation correspondence

_X__ Maps, photographs, drawings, and/or plans

_X__ Additional historic property information

_X__ Other: Mitigation alternatives analysis

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Preserving America's Heritage

January 30, 2018

Mr. Scott Tener, P.E.
Environmental Specialist
Federal Aviation Administration
Central Region Airports Division
901 Locust Street, Room 364
Kansas City, MO 64106-2325

Ref: *Proposed Terminal Replacement Project at the Kansas City International Airport*
Kansas City, Platte County, Missouri

Dear Mr. Tener:

The Advisory Council on Historic Preservation (ACHP) has received your notification and supporting documentation regarding the adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO), affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and it is determined that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR §800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the Missouri State Historic Preservation Officer (SHPO), and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the MOA, and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with the notification of adverse effect. If you have any questions or require further assistance, please contact Ms. Sarah Stokely at (202) 517-0224 or via email at sstokely@achp.gov.

Sincerely,

LaShavio Johnson

LaShavio Johnson
Historic Preservation Technician
Office of Federal Agency Programs

ADVISORY COUNCIL ON HISTORIC PRESERVATION
401 F Street NW, Suite 308 • Washington, DC 20001-2637
Phone: 202-517-0200 • Fax: 202-517-6381 • achp@achp.gov • www.achp.gov

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U.S. Department
of Transportation

**Federal Aviation
Administration**

Central Region
Iowa, Kansas,
Missouri, Nebraska

901 Locust
Kansas City, Missouri 64106
(816) 329-2600

January 31, 2018

CERTIFIED MAIL

Dr. Toni M. Prawl
Director and Deputy State Historic Preservation Officer
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

Kansas City International Airport
Kansas City, Platte County, Missouri
Section 106 Coordination, SHPO Log Number 007-PL-13
Additional Information – Cut/Fill Drawings and Structures Map

Dear Dr. Prawl:

As requested, please find enclosed drawings showing areas of land disturbance associated with construction of the existing airport terminal facility. The drawings include cross sections showing depths of cut and fill. Also enclosed is a map of structures located within the direct area of potential effect.

Please let me know if you have any questions or require additional information, (816) 329-2639 or scott.tener@faa.gov.

Sincerely,

Scott Tener, P.E.
Environmental Specialist

Enclosures

Cc: Jade Liska, Kansas City Aviation Department (no enclosures)
Rob Adams, Landrum & Brown (no enclosures)

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11279 Cornell Park Dr.
Cincinnati, OH 45242
USA
T +1 513 530 5333
F +1 513 530 1278
landrum-brown.com

February 13, 2018

Amanda Burke
Historic Preservation Specialist
Missouri SHPO
P.O. Box 176
Jefferson City, MO, 65102

Re: Invitation for Agency Scoping Meeting March 15, 2018
Replacement Terminal Project Environmental Assessment
Kansas City International Airport

Dear Ms. Burke,

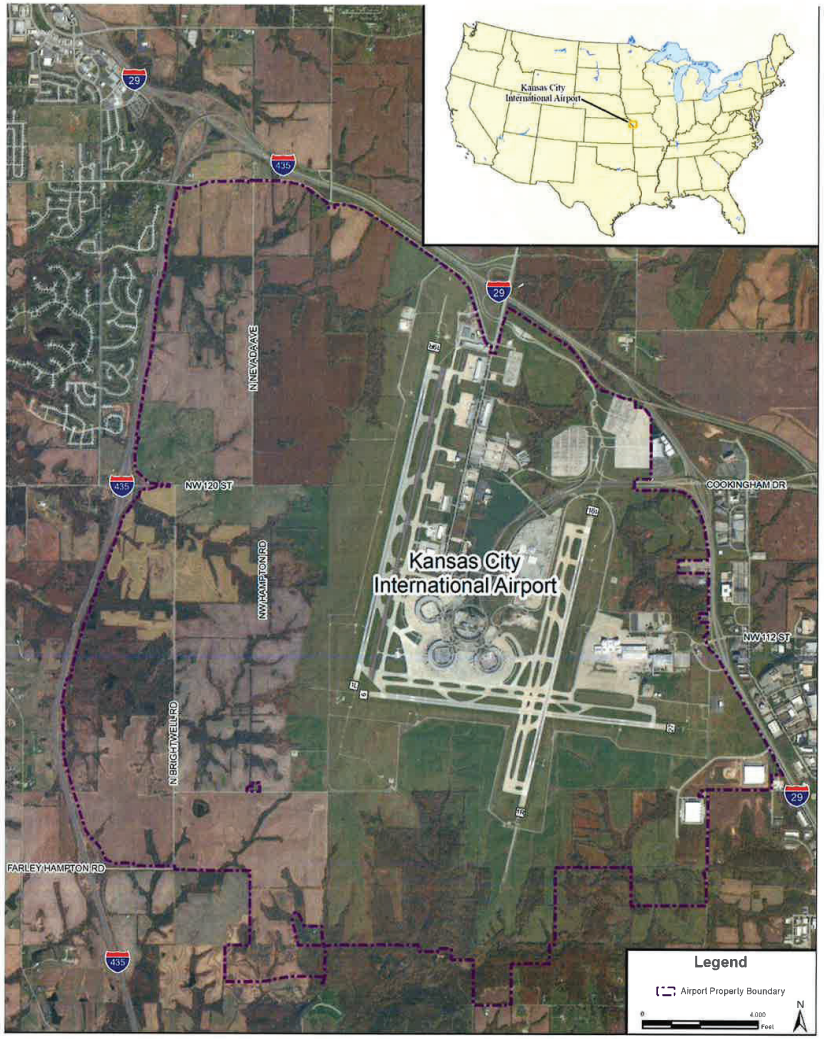
This letter is sent to inform you that the City of Kansas City, Missouri Aviation Department (KCAD) is preparing an Environmental Assessment (EA) for the Proposed Replacement Terminal Project (the Proposed Action) at the Kansas City International Airport (KCI). The location of the Airport is shown on **Exhibit 1**. The EA will investigate, analyze, and disclose any potential environmental impacts of the Proposed Action and its reasonable alternatives. The Federal Aviation Administration (FAA) is the lead Federal agency that will review the EA and as such the document will be prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures,* FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions,* and the FAA's Environmental Desk Reference for Airport Actions.

Your agency is invited to participate in an agency scoping meeting to be held March 15, 2018 at 2:00 p.m. at the Ambassador Building, 12200 N Ambassador Drive, Kansas City, Missouri. This agency scoping meeting is to identify potential issues associated with the Proposed Action and to determine if your agency has additional information on the human and natural environment of the proposed Project Site. Please respond to let us know if you will be attending in person. If you are unable to attend the scoping meeting, we can send out a link to join a web-based meeting. Written comments may be submitted not later than Monday, April 16th at 5:00 p.m. to the following address:

Landrum & Brown
Attn: Chris Babb
11279 Cornell Park Drive
Cincinnati, OH 45242

The purpose of the proposed replacement terminal project is to increase passenger level of service and reduce operational costs and inefficiencies. The overall goal of KCAD is to provide new, efficient, and technologically advanced airside, terminal, and landside facilities that increase passenger level of service.

Exhibit 1



The Proposed Action includes the following elements:

- Decommission and demolish existing Terminal A, including the Terminal A parking garage and aircraft apron, as conceptually shown on **Exhibit 2**,
- Decommission and demolish existing Terminal B and Terminal C and consolidate airline operations at the new replacement Terminal; (Terminal B and C would remain open during construction of the new terminal),
- Construct new terminal apron area around replacement terminal,
- Realign or relocate FAA facilities, including but not limited to the FAA compound wall, roadways leading to the FAA facility, FAA vehicle parking, duct banks, and cable loop,
- Construct new parking garage and a surface parking lot,
- Modify existing roadways and construct new roadways in the terminal area,
- Construct various storm water collection system improvements,
- Renovate existing Central Utility Plant (CUP) or construct replacement utility infrastructure,

The Project Site for the Proposed Action is within the existing terminal complex. The existing land uses with the Project Site are made up of developed land used for airport operations. For the purposes of the EA, areas that may be potentially disturbed are shown on **Exhibit 3.** The Proposed Action would physically alter portions of the Airport property. While all required environmental categories will be reviewed in the NEPA process, due to the location of the Project Site, the Proposed Action would not impact coastal resources, farmlands, or wild and scenic rivers. Although Best Management Practices would be adopted to minimize and reduce potential impacts, the following environmental categories have been identified where potential environmental impacts may occur.

Air Quality

KCI is located in Platte County, Missouri. The U.S. Environmental Protection Agency (USEPA) has designated Platte County attainment for all Federally-regulated pollutants referred to as criteria pollutants, which are carbon monoxide (CO), ozone (O_3), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), coarse particulate matter (PM_{10}), fine particulate matter, ($PM_{2.5}$) and lead (Pb).

The Proposed Action is not anticipated to cause an increase in aircraft operations or result in a change to fleet mix. However, the Proposed Action may cause a change in runway use by aircraft. In addition, the Proposed Action would cause emissions due to construction activity therefore an air quality assessment including a construction emissions inventory will be conducted to determine the impact, if any, upon local air quality.

Biological Resources

Biotic communities, including flora and fauna, impacted by the Proposed Action and the alternatives will be described and documented in the EA. The Project Site is currently used for aircraft operations and for the existing terminals. No known areas of critical wildlife habitat exist within the Project Site, therefore the potential for threatened and endangered species or habitat is unlikely.

Department of Transportation Act, Section 4(f)

Section 4(f) of the U.S. Department of Transportation (DOT) Act of 1966, as amended, provides protection for certain publicly-owned lands including parks, recreation areas, wildlife or waterfowl refuges, and any historic site listed or eligible for listing on the National Register of Historic Places. For this project, a Section 4(f) evaluation and determination will be required.

Exhibit 2



Hazardous Materials, Solid Waste, and Pollution Prevention

The potential for significant impacts from hazardous materials will be examined and documented in the EA. Asbestos is known to be within the existing Terminal buildings; however, mitigation measures for its proper demolition and removal would be disclosed in the EA.

Historical, Architectural, Archeological, and Cultural Resources

The potential for impacts to any Historic, Architectural, Archaeological, and Cultural Resources resulting from the Proposed Action will be examined and disclosed. The FAA has made a determination that the existing terminals are eligible for the National Register of Historic Places (NRHP). In accordance with the National Historic Preservation Act (NHPA), the FAA submitted that determination to the Missouri Department of Natural Resources, which serves as the State Historic Preservation Office (SHPO) for Missouri. The SHPO has concurred with the determination and the formal Section 106 process under the NHPA has been started. A Draft Memorandum of Agreement (MOA) is being created between KCAD, FAA, and the SHPO for mitigating adverse effects to historic properties from the Proposed Action.

Land Use

The Proposed Action will occur entirely on Airport-owned property and is not anticipated to affect land use compatibility.

Natural Resources and Energy Supply

The effects of each alternative on natural resources and energy supplies will be evaluated in the EA in terms of increased draw upon utilities, consumption of combustible fuels, and consumption of construction materials.

Noise and Noise-Compatible Land Use

As previously stated the Proposed Action is not anticipated to cause an increase in aircraft operations or result in a change to fleet mix. However, the Proposed Action may cause a change in runway use by aircraft. A noise analysis will be conducted using the Aviation Environmental Design Tool (AEDT) to determine and disclose potential impacts.

Socioeconomic Impacts, Environmental Justice, and Children's Environmental Health and Safety Risks

The potential for induced socioeconomic impacts, to the extent that they are influenced by the Proposed Action, will be assessed in the EA. The impact analysis will consider both beneficial as well as adverse induced economic impacts, changes in the economic structure of the area, and economic opportunities and potential displacements resulting from shifts in economic demand.

Visual Effects

The EA will include an evaluation to determine potential changes in the visual character of the area and the extent to which any lighting associated with the Proposed Action or alternatives will create an annoyance among people in the vicinity or interfere with their normal activities. However, due to the location of the site within the existing terminal core, the Proposed Action is not anticipated to affect light emissions.

Water Resources

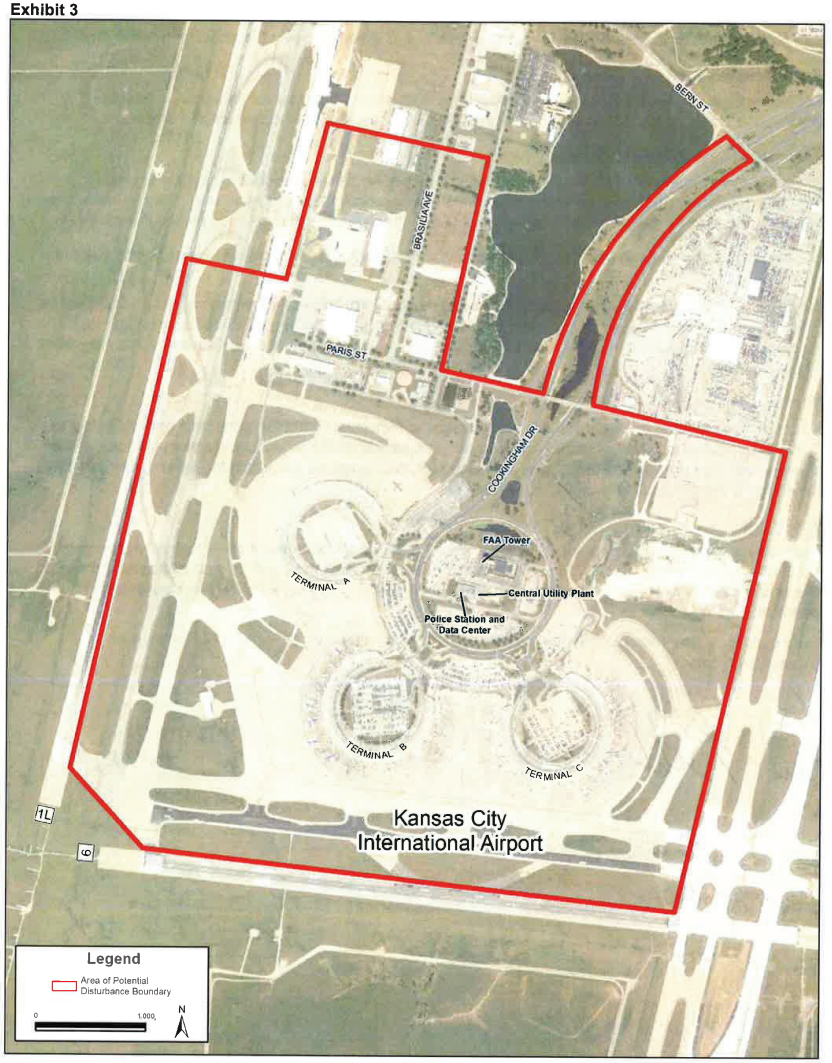
The EA will include an evaluation to determine if the alternatives would cause potential impacts to water resources, including floodplains, groundwater, wetlands and streams, or surface waters. From previous studies conducted on the Airport there are no jurisdictional waters at the site of the Proposed Action. The area for the replacement terminal is already impervious surface.

If you have any questions concerning this matter, please contact me by phone at (513) 560-1242 or email at cbabb@landrum-brown.com.

Sincerely,

Chris Babb
Managing Consultant
Landrum & Brown, Incorporated

Exhibit 3



Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Eric R. Greitens, Governor
Carol S. Comer, Director

March 12, 2018

Mr. Scott Tener, P.E.
901 Locust
Kansas City, Missouri 64106

Re: **SHPO Project Number: 007-PL-13** – Kansas City International Airport – Cut/Fill Drawings and Structures Map, Platte County, MO

Dear Mr. Tener:

Thank you for submitting information on the above referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.L. 89-665, as amended) and the Advisory Council on Historic Preservation's regulation 36 CFR part 800, which require identification and evaluation of cultural resources.

We have reviewed the information provided concerning the above referenced project. We have determined that there is a moderate to high potential for the presence of archaeological sites in areas where cut/grading has not been established within the direct APE. Depending on the placement and disturbance level of new construction for this project, there is the possibility for buried deposits under fill placed for the current terminals. An archaeological survey, with deep testing as deemed appropriate, should be conducted, dependent upon further review of plans. This survey should be completed prior to the initiation of project-related construction activities. We look forward to continuing consultation regarding the above ground structures that may be affected by this project.

A list of independent archaeological contractors who can perform such services is available through the Missouri Department of Natural Resources at:
https://dnr.mo.gov/shpo/docs/ArchaeologyConsultantList-2017.pdf

Please note that any 36 CFR Part 61 qualified archaeologist may perform an archaeological survey. If you choose a contractor not on the list, please be certain to include his or her curriculum vitae in the report. We would appreciate **one (1) hard copy and one (1) pdf copy** of the archaeological survey report when it is finished so we may complete the review and comment process.

Recycled paper

If you have any questions, please write Heather Gibb at State Historic Preservation Office, P.O. Box 176, Jefferson City, Missouri 65102 or call Ms. Gibb at 573/751-7862. Please be sure to include the SHPO Log Number **(007-PL-18)** on all future correspondence or inquiries relating to this project.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Toni M. Prawl

Toni M. Prawl, Ph.D.
Director and Deputy State
Historic Preservation Officer

TMP:hg

c Ms. Amber Tilley, EPA

U.S. Department
of Transportation

**Federal Aviation
Administration**

Central Region
Iowa, Kansas,
Missouri, Nebraska

901 Locust
Kansas City, Missouri 64106
(816) 329-2600

June 6, 2018

CERTIFIED MAIL

Dr. Toni M. Prawl
Director and Deputy State Historic Preservation Officer
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

SHPO Project Number: 007-PL-18
Section 106 Coordination
Environmental Assessment for Proposed Replacement Terminal Project
Kansas City International Airport
Kansas City, Platte County, Missouri

Dear Dr. Prawl:

Per your letter dated March 12, 2018, the FAA advised the Kansas City Aviation Department (KCAD) to conduct an archaeological survey with deep testing as deemed appropriate associated with the Replacement Terminal Project at the Kansas City International Airport. The archaeological/cultural resources survey and report will document the presence or absence of significant archaeological/cultural resources in the Direct Area of Potential Effect (APE). Resources could include artifact scatters, habitation sites, burials, earthworks, or other sites. As we have discussed, the Direct APE includes the areas that may have the potential for physical disturbance and includes areas of construction, borrow/fill sites, staging and stockpile areas, utility corridors, and haul routes for the proposed undertaking. The surveys and testing will follow Missouri State Historic Preservation Office (SHPO) guidlines. An independent professional archaeologist meeting 36 CFR Part 61 qualifications will conduct the survey. KCAD selected Golder Associates Inc., Green Bay, WI, to complete the archaeological/cultural resources survey.

The project archaeologist will search site files and maps using the Missouri DNR Archaeology Data Viewer at the SHPO. The review will follow the nine-point checklist recommended by the SHPO. The project archeologist will also examine Aerial photographs, Bureau of Economic Geology Maps, the National Register of Historic Places (NRHP) database, General Land Office (GLO) records, and the Natural Resources Conservation Service's Web Soil Survey. These sources provide information on the nature and location of previous archaeological surveys and recorded cultural resource sites and may provide important site and geographic information that could be essential to the discovery of cultural resources near the Direct APE.

The project archaeologist made a preliminary site visit of the Direct APE on May 31, 2018 to examine the ground surface. The project archaeologist determined approximately 180 shovel tests and eight (8) deep test sites should occur in the Direct APE.

Shovel tests will be excavated to a maximum depth of one meter or culturally sterile deposits, whichever comes first. The matrix will be screened through one-quarter-inch mesh. The location of each shovel test will be plotted on a global positional system (GPS) unit, and each test will be recorded on appropriate project field forms.

For the eight deep testing sites, trenches will be dug by a backhoe to six to eight meters in length and one meter in width. An experienced archaeologist will monitor all trenching. After the completion of each trench excavation, the soil profiles will be examined by a geoarchaeologist for the presence of cultural materials, anomalies, and general geomorphic data. Stratigraphic profile drawings with soil descriptions will be recorded for each trench, and the entire process will be thoroughly photographed. All trenches will be backfilled and leveled upon completion of excavation and recording.

During the site visit on May 31, 2018, the project archaeologist also determined that there were areas that would not be appropriate for shovel testing or deep testing. These areas include paved areas currently used as aircraft parking or movement areas, and areas found to have 30 to 60 feet of fill material used in the original construction of the terminals and airport in the early 1970's. For these areas, a construction monitoring program will be recommended. This will include having an archaeologist on site during certain times of construction activities when digging may occur at these depths.

The archaeological report will be prepared in compliance with SHPO and Register of Professional Archaeologists (RPA) standards. The report will summarize the results of the Phase I archaeological investigations. The report will document methods used, the presence and condition of previously recorded sites located in the project area, cultural resources encountered during the archaeological survey, NRHP significance of cultural resources encountered within the project area, and general project recommendations. The report will include photographs, maps, and other graphics. Relevant maps will depict the maximum limits of the areas actually surveyed in the field.

In addition, this report will contain the NRHP eligibility of sites identified during the archaeological investigations and will provide supporting documentation of the eligibility or ineligibility status. As we have already determined, the Terminal buildings themselves are eligible for listing on the NRHP. This report will be for subsurface archaeological and cultural resources only.

KCAD anticipates the archaeological/cultural resources survey will be conducted the week of June 12, 2018. When the testing and report are complete, we will provide for your review as requested. If you have questions or issues with the direction or methodology of the survey, please contact me at 816-329-2639 or scott.tener@faa.gov.

Sincerely,

Original Signed By
Scott D. Tener

Scott Tener, P.E.
Environmental Specialist

Cc: Jade Liska, Kansas City Aviation Department (no enclosures)
Chris Babb, Landrum & Brown (no enclosures)

U.S. Department
of Transportation

**Federal Aviation
Administration**

Central Region
Iowa, Kansas,
Missouri, Nebraska

901 Locust
Kansas City, Missouri 64106
(816) 329-2600

June 6, 2018

CERTIFIED MAIL

Dr. Andrea Hunter
Director, THPO
Osage Nation
627 Grandview
Pawhuska, OK 74056

Section 106 Consultation
Environmental Assessment for Proposed Replacement Terminal Project
Kansas City International Airport
Kansas City, Platte County, Missouri

Dear Dr. Hunter:

To give you an update. After our consultation meeting with you on March 12, 2018 and consulting with the Missouri SHPO, the FAA advised the Kansas City Aviation Department (KCAD) to conduct an archaeological survey with deep testing as deemed appropriate associated with the Replacement Terminal Project at the Kansas City International Airport. The archaeological/cultural resources survey will document the presence or absence of significant archaeological/cultural resources in the Direct Area of Potential Effect (APE). Resources could include artifact scatters, habitation sites, burials, earthworks, or other sites. As we have discussed, the Direct APE includes the areas that may have the potential for physical disturbance and includes areas of construction, borrow/fill sites, staging and stockpile areas, utility corridors, and haul routes for the proposed undertaking. The surveys and testing will follow Missouri State Historic Preservation Office (SHPO) guidlines. An independent professional archaeologist meeting 36 CFR Part 61 qualifications will conduct the survey. KCAD selected Golder Associates Inc., Green Bay, WI, to complete the archaeological/cultural resources survey. Mr. David Wilcox, M.A., R.P.A, will be the Senior Project Archeologist.

The project archaeologist will search site files and maps using the Missouri DNR Archaeology Data Viewer at the SHPO. The project archeologist will also examine Aerial photographs, Bureau of Economic Geology Maps, the National Register of Historic Places (NRHP) database, General Land Office (GLO) records, and the Natural Resources Conservation Service's Web Soil Survey. These sources provide information on the nature and location of previous archaeological surveys and recorded cultural resource sites and may provide important site and geographic information that could be essential to the discovery of cultural resources near the Direct APE.

The project archaeologist made a preliminary site visit of the Direct APE on May 31, 2018 to examine the ground surface. The project archaeologist determined approximately 180 shovel tests and eight (8) deep test sites should occur in the Direct APE.

Shovel tests will be excavated to a maximum depth of one meter or culturally sterile deposits, whichever comes first. For the eight deep testing sites, trenches will be dug by a backhoe to six to eight meters in length and one meter in width. An experienced archaeologist will monitor all trenching. The matrix will be screened through one-quarter-inch mesh. After the completion of each trench excavation, the soil profiles will be examined by a geoarchaeologist for the presence of cultural materials, anomalies, and general geomorphic data. Stratigraphic profile drawings with soil descriptions will be recorded for each trench, and the entire process will be thoroughly photographed. All trenches will be backfilled and leveled upon completion of excavation and recording.

During the site visit on May 31, 2018, the project archaeologist also determined that there were areas that would not be appropriate for shovel testing or deep testing. These areas include paved areas currently used as aircraft parking or movement areas, and areas found to have 30 to 60 feet of fill material used in the original construction of the terminals and airport in the early 1970's. For these areas, a construction monitoring program will be recommended. This will include having an archaeologist on site during certain times of construction activities when digging may occur at these depths.

The archaeological report will be prepared in compliance with SHPO and Register of Professional Archaeologists (RPA) standards. The report will summarize the results of the Phase I archaeological investigations. The report will document methods used, the presence and condition of previously recorded sites located in the project area, cultural resources encountered during the archaeological survey, NRHP significance of cultural resources encountered within the project area, and general project recommendations. The report will include photographs, maps, and other graphics. Relevant maps will depict the maximum limits of the areas actually surveyed in the field.

In addition, this report will contain the NRHP eligibility of sites identified during the archaeological investigations and will provide supporting documentation of the eligibility or ineligibility status. This report will be for subsurface archaeological and cultural resources only.

KCAD anticipates that the archaeological/cultural resources survey will be conducted the week of June 12, 2018. When the testing and report are complete, we will provide for your review. If you have questions or issues with the direction or methodology of the survey, please contact me at 816-329-2639 or scott.tener@faa.gov.

Sincerely,

Original Signed By
Scott D. Tener

Scott Tener, P.E.
Environmental Specialist

Cc: Jade Liska, Kansas City Aviation Department (no enclosures)
Chris Babb, Landrum & Brown (no enclosures)

U.S. Department
of Transportation

**Federal Aviation
Administration**

Central Region
Iowa, Kansas,
Missouri, Nebraska

901 Locust
Kansas City, Missouri 64106
(816) 329-2600

July 10, 2018

CERTIFIED MAIL

Dr. Toni M. Prawl
Director and Deputy State Historic Preservation Officer
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

SHPO Project Number: 007-PL-18
Section 106 Coordination
Environmental Assessment for Proposed Replacement Terminal Project
Kansas City International Airport
Kansas City, Platte County, Missouri

Dear Dr. Prawl:

As requested in your March 12, 2018 letter, the Kansas City Aviation Department (KCAD) completed a Phase I archeological survey with deep testing of the Direct APE associated with the proposed replacement terminal project. The assessment found no evidence of historic material or remains within the undertaking's Direct APE. We are providing the Phase I Archeological Survey of the Direct APE for your review.

The project archaeologist determined that certain areas were not appropriate for shovel testing or deep testing. These areas include paved areas currently used as aircraft parking or movement areas, and areas found to have 30 to 60 feet of fill material used in the original construction of the terminals and airport in the early 1970's. For these areas, an unanticipated discovery plan and archeological monitoring program is recommended. This will include having an archaeologist on site during construction when initial ground disturbing activities are being conducted at depths below the fill material used in the original terminal construction in the 1970's.

Archeological Determination
Based on this current survey of the Direct APE, the FAA determined that there would be "No historic properties affected" for archeological sites. Based on previous surveys of the Indirect APE, the FAA determined that "No historic properties are adversely affected".

Historic Structures Determination
As previously determined, construction and operation of the proposed undertaking would result in direct impacts to existing Terminals A, B, and C through demolition of the historic structures. The FAA determined that there would be an "adverse effect" on Terminals A, B, and C. To mitigate the adverse effect, we are proposing a Memorandum of Agreement (MOA) be developed.

We would like to schedule a meeting with you and your staff for August 20, 2018 to discuss findings, recommendations, mitigation, and next steps including the development of a Memorandum of Agreement. Please let us know if this date works for you. If you have any questions, please contact me at scott.tener@faa.gov or (816) 329-2639.

Sincerely,

Scott Tener, P.E.
Environmental Specialist

Enclosures: Phase I Archeological Survey, July 2018, Golder Associates Inc.

Cc: Jade Liska, Kansas City Aviation Department (no enclosures)
Chris Babb, Landrum & Brown (no enclosures)

U.S. Department
of Transportation

**Federal Aviation
Administration**

Central Region
Iowa, Kansas,
Missouri, Nebraska

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Kansas City, Missouri 64106
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July 10, 2018

CERTIFIED MAIL

Dr. Andrea Hunter
Director, THPO
Osage Nation
627 Grandview
Pawhuska, OK 74056

Section 106 Consultation
Environmental Assessment for Proposed Replacement Terminal Project
Kansas City International Airport
Kansas City, Platte County, Missouri

Dear Dr. Hunter:

At the request of the Missouri SHPO, the Kansas City Aviation Department (KCAD) completed a Phase I archeological survey with deep testing of the Direct APE (study area ~700 acres) associated with the proposed replacement terminal project. The assessment found no evidence of historic material or remains within the undertaking's Direct APE. We are providing the July 2018 Phase I Archeological Survey of the Direct APE for your review.

The project archaeologist determined that certain areas were not appropriate for shovel testing or deep testing. These areas include paved areas currently used as aircraft parking or movement areas, and areas found to have 30 to 60 feet of fill material used in the original construction of the terminals and airport in the early 1970's. For these areas, an unanticipated discovery plan and archeological monitoring program is recommended. This will include having an archaeologist on site during construction when initial ground disturbing activities are being conducted at depths below the fill material used in the original terminal construction in the 1970's.

During our March 2018 meeting, you requested the following items associated with this project for your review:

- 2008 Phase I Cultural Resources Survey of the Indirect APE (~8000 acres) – enclosed
- Drawings of cut/fill areas and cross-sections – enclosed, Appendix D, 2018 survey of the Direct APE
- Soils Data/GEO Tech report for 1960s of original terminal construction – not found, KCAD only has haul receipts documenting material amounts

- Proposed borrow/fill sites for new terminal construction – sites will not be located on airport property. The construction contractor will be responsible for obtaining fill material and/or disposing of material off airport property. Off airport sites not yet determined.

Based on the current survey of the Direct APE, the FAA determined that there would be "No historic properties affected" for archeological sites. Based on previous surveys of the Indirect APE, the FAA determined that "No historic properties are adversely affected".

Since you previously requested to be a consulting party and a signatory to any MOA, we would like to schedule a meeting with you and your staff for August 24, 2018 to discuss findings, recommendations, and next steps including the development of a Memorandum of Agreement. Please let us know if this date works for you. If you have any questions, please contact me at scott.tener@faa.gov or (816) 329-2639.

Sincerely,

Scott Tener, P.E.
Environmental Specialist

Enclosure: Phase I Archeological Survey, July 2018, Golder Associates Inc.
Cultural Resource Investigations Phase I Survey, April 2008, ERC, Inc
CD with electronic copies of the above reports

Cc: Jade Liska, Kansas City Aviation Department (no enclosures)
Chris Babb, Landrum & Brown (no enclosures)

GOLDER

REPORT

PHASE I ARCHAEOLOGICAL SURVEY

Kansas City International Airport Archaeological Services, Platte County, Missouri

Submitted to:

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Submitted by:

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October 2018



Preliminary Distribution List

Landrum & Brown

Missouri State Historic Preservation Office

City of Kansas City, Aviation Department

Golder Associates Historic Preservation Office

Table of Contents

1.0 EXECUTIVE SUMMARY 1
2.0 MANAGEMENT SUMMARY 2
2.1 Project Description 2
2.2 Locations 2
2.3 Number of Acres Surveyed 2
2.4 Principal Investigator 2
2.5 Dates of Work 2
2.6 Purpose of Work 2
2.7 Number of Sites 2
2.8 Eligibility of Sites 2
2.9 Curation 2
2.10 Comments 3
3.0 INTRODUCTION 3
4.0 DEFINITION OF STUDY AREA 3
4.1 Geology 4
4.2 Soils 4
4.3 Vegetation 5
4.4 Cultural Context 5
4.4.1 The Paleoindian Period (12,000 to 8,000 B.C.) 5
4.4.2 The Dalton Period (8,000-7,000 B.C.) 6
4.4.3 The Archaic Period (7,000-1,000 B.C.) 6
4.4.3.1 Early Archaic Period (7,000-5,000 B.C.) 6
4.4.3.2 Middle Archaic Period (5,000-3,000 B.C.) 6
4.4.3.3 Late Archaic Period (3,000-1,000 B.C.) 7
4.4.4 The Woodland Period (1,000 B.C.-A.D. 900) 7
4.4.4.1 Early Woodland Period (1,000-500 B.C.) 7
4.4.4.2 Middle Woodland Period (500 B.C.-A.D. 400) 7

4.4.4.3 Late Woodland Period (A.D. 400-900) 8
4.4.5 The Mississippian Period (A.D. 900-1700) 8
4.5 A History of Platte County 9
5.0 METHODS 10
5.1 Background Review 10
5.2 Field Methods 10
6.0 RESULTS 11
6.1 Background Review 11
6.2 Field Survey 15
6.2.1 Backhoe Trenches 16
6.2.1.1 Trench 1 17
6.2.1.2 Trench 2 17
6.2.1.3 Trench 3 17
6.2.1.4 Trench 4 17
6.2.1.5 Trench 5 18
6.2.1.6 Trench 6 18
6.2.1.7 Trench 7 18
6.2.1.8 Trench 8 19
6.2.2 Geologic Boring 19
7.0 SUMMARY AND RECOMMENDATIONS 19
8.0 REFERENCES 22

TABLES

Table 1. Prominent Soil on the Direct APE
Table 2. Previous Investigations within 1-Mile of the Direct APE
Table 3. Previously Recorded Sites within 1-Mile of the Direct APE
Table 4. Trench Descriptions by Location, Dimensions, and Landform within the Direct APE

FIGURES

Figure 1. Site Location
Figure 2. Topographic Map -1961
Figure 3. Topographic Map – 1950
Figure 4. Aerial Map
Figure 5. Area to Be Tested

Figures 6, and 6a-6j. Shovel Test Locations
Figure 7. Trenches

APPENDICES

Appendix A Figures
Appendix B Photographs
Appendix C Shovel Tests
Appendix D Supplemental Information

1.0 EXECUTIVE SUMMARY

This report details the results of a Phase I archaeological survey of an approximate 710-acre block known as the Direct Area of Potential Effects (APE) for the proposed Replacement Terminal Environmental Assessment (EA) for the Kansas City International (KCI) Airport in Platte County, Missouri. The Proposed Action, which is the subject of the EA, includes the demolition of Terminal A and construction of a new replacement terminal on Airport property located on the existing Terminal A site. There are currently no aircraft operations at Terminal A as it was de-activated in 2014. The Proposed Action also includes construction of a new parking structure and demolition of the existing Terminals B and C after the new terminal is in operation. The archaeological investigations were conducted as part of a due diligence process to consider the effects of the Proposed Action on cultural resources in compliance with Section 106 of the National Historic Preservation Act (NHPA). All archaeological investigations were conducted in accordance with Section 106 of the NHPA. The archaeological investigations included a background records review and intensive pedestrian survey of the Direct APE to systematically identify, record, delineate, and if possible, determine the significance of any cultural resources located within the Direct APE. The Direct APE is in Sections 21, 22, 27 and 28, Township 52 North, and Range 34 West, and is entirely bounded within the KCI Airport property.

The records review conducted in June 2018 revealed that six previous archaeological investigations and 28 previously recorded sites are within a one-mile radius of the Direct APE. None of these previously recorded cultural resources, 21 historic sites, and seven prehistoric sites are located within the Direct APE.

The current public concern is that unmarked burial sites might be located where the existing KCI terminals are located and on Airport property. Per the Missouri Department of Natural Resources State Historic Preservation Office's (SHPO) letter to the FAA dated March 12, 2018, the SHPO determined there is a moderate to high potential for the presence of archaeological sites in areas where cut/grading has not been established within the Direct APE.

During the Phase I archaeological survey, the 710-acre block area was investigated utilizing available surface exposures, shovel testing, and backhoe trenching. The survey revealed a low potential for significant cultural resources given to the Proposed Action being entirely contained within the KCI Airport's facility, which showed evidence of prior disturbances (lacking a top soil, truncation, mottled, reverse stratigraphy, or having imported gravels and angular concrete fragments).

Based on the results of this 2018 survey, development within the Direct APE will have no effect on known cultural resources. In accordance with 36 CFR 800.4, Golder has made a reasonable and good faith effort to identify archaeological and historic properties within the Direct APE. There were areas that were not appropriate for shovel testing or deep testing. These areas include paved and currently used as apron or aircraft movement areas, and areas found to have anywhere from 30 to 60 feet of fill material used in the original construction of the terminals and Airport in the early 1970's. Therefore it is recommended that an Unanticipated Discovery Plan be produced to assist with any inadvertent cultural resource discovery that may occur during subsurface disturbances associated with the Proposed Action. Furthermore, it is recommended that an archaeological monitor be present to accommodate public concerns during initial ground disturbing activities where those activities are being conducted at depths below the fill material used in the original terminal construction in the 1970's. See Appendix D for cut/fill depths of original terminal construction.

2.0 MANAGEMENT SUMMARY

2.1 Project Description

Golder Associates Inc. (Golder) conducted an intensive cultural resources survey to support the EA for the Direct APE in northwestern Missouri. The proposed undertaking is to demolish Terminal A, including the Terminal A parking garage and portions of the aircraft apron, to facilitate the construction of a new terminal. After the construction of Terminal A and associated facilities is completed, Terminals B and C will be decommissioned and demolished, consolidating current airline operations at the newly constructed terminal. Additional construction plans include a new parking garage and a surface parking lot, modifying existing roadways, constructing new roadways in terminal areas, and constructing various stormwater collection systems including an improved glycol recovery system. Renovations at the existing Central Utility Plant (CUP) are also planned.

2.2 Locations

The Direct APE is located in southern Platte County, Missouri, bounded by Bern Street to the north, NW Prairie View Road to the east, KCI Service Road to the west, NW 104 Street to the south, and encompassed within the KCI Airport Facility. The Direct APE appears on the Ferrelview 7.5-minute US Geological Survey (USGS) topographical quadrangle map and is located in Sections 21, 22, 27 and 28, Township 52 North, and Range 34 West.

2.3 Number of Acres Surveyed

Approximately 710.10 acres were surveyed.

2.4 Principal Investigator

David Wilcox of Golder was the principal investigator.

2.5 Dates of Work

The dates of fieldwork were June 12 through 17, 2018. Daily email reports were sent to the Osage Nation Historic Preservation Office as they requested.

2.6 Purpose of Work

The project currently falls under the purview of Federal and State cultural resource regulations. The archaeological investigations were conducted as part of a due diligence process to consider the effects of the Proposed Action on cultural resources in compliance with Section 106 of the National Historic Preservation Act. The archaeological investigations included a background records review and intensive pedestrian survey of the Direct APE.

2.7 Number of Sites

No sites were identified in the Direct APE.

2.8 Eligibility of Sites

None.

2.9 Curation

No artifacts were collected, and nothing was curated.

2.10 Comments

The survey revealed a low potential for significant cultural resources in the Direct APE due to heavily disturbed and horizontally displaced soils from vegetation clearing and previous construction. No cultural resources were discovered during the survey. Based on these findings, any development of the Proposed Action will have no effect on cultural resources. There were areas that were not appropriate for shovel testing or deep testing. These areas include paved and currently used as apron or aircraft movement areas, and areas found to have anywhere from 30 to 60 feet of fill material used in the original construction of the terminals and Airport in the early 1970's. Therefore it is recommended that an Unanticipated Discovery Plan be produced to assist with any inadvertent cultural resource discovery that may occur during subsurface disturbances associated with the Proposed Action. Furthermore, it is recommended that an archaeological monitor be present to accommodate public concerns during initial ground disturbing activities where those activities are being conducted at depths below the fill material used in the original terminal construction in the 1970's. See Appendix D for cut/fill depths of original terminal construction.

3.0 INTRODUCTION

Golder conducted the Phase I archaeological survey investigations on the Direct APE, the demolition of existing Terminals and the construction of a new terminal facility within the current KCI Airport boundary in northwestern Missouri (Appendix A - Figure 1). The Direct APE, an irregular shaped parcel within the existing KCI Airport, will comprise approximately 710 acres.

The investigations, which included a background records review and intensive pedestrian survey, were conducted to inventory cultural resources within the Direct APE and provide recommendations on the management of sites. The project is currently subject to Federal and State cultural resource regulations. The cultural resource investigations are being conducted in compliance with the requirements of Section 106 of the NHPA to assess the effects of the undertaking on cultural resources. Considerations of site significance were made according to criteria established in the National Register of Historic Places.

All investigations were conducted in accordance with the Missouri Department of Natural Resources (MO-DNR) and State Historic Preservation Office (SHPO) Guidelines for Phase I Archaeological Surveys and Reports, and Register for Professional Archaeologists (RPA) standards. David Wilcox acted as Principal Investigator for the survey; and Chris Tinti (archaeologist), and David Wilcox (geoarchaeologist) conducted the fieldwork investigations from June 12 through 18, 2018. Their resumes are provided in Appendix D.

4.0 DEFINITION OF STUDY AREA

The Area of Potential Effects (APE) is "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties" (36 C.F.R. § 800.16(d)). For purposes of Section 106, the term "historic properties" can include architectural, archeological, or cultural resources. The determination of the APE considers the character of a project area and the potential for resources to be found. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking (36 C.F.R. § 800.16(d)).

The proposed undertaking would include ground disturbance and construction activities within the existing terminal complex. The land uses within this area are made up of developed land used for Airport operations. Therefore, for direct impacts the area of potential disturbance was defined as the Direct APE. The Direct APE

includes areas of construction, borrow/fill sites, staging and stockpile areas, utility corridors, and haul routes for the Proposed Action.

For indirect impacts, such as impacts due to noise or changes in view, an Indirect APE was identified by first identifying historic properties near the Airport and then identifying the geographic area within which the undertaking may cause changes in the character or use of the historic properties. No known or potential archeological sites would be physically disturbed by the Proposed Action in the Indirect APE. Therefore, for this pedestrian survey, shovel testing, and deep testing, only the Direct APE was appropriate for determining the potential to directly impact any cultural or archeological resources as requested by the SHPO in their March 12, 2018 correspondence to the FAA.

The Direct APE is located in southern Platte County, Missouri, and situated in Sections 21, 22, 27 and 28, Township 52 North, and Range 34 West (Appendix A - Figures 2 and 3). The Direct APE is confined by Bern Street to the north, NW Prairie View Road to the east, KCI Service Road to the west, NW 104 Street to the south, and encompassed within the KCI Airport Facility. Modern disturbances within the Direct APE include numerous buried utility line corridors, gravel packed roads, concrete tarmac surfaces, containment ponds, paved roads, vegetation clearing, berms, mechanical truncation, fence lines, storage tanks, ditches, manicured lawns, and buildings associated with the KCI Airport's administration, support facilities and other commercial buildings (Appendix A - Figure 4; and Appendix B - Photographs 1 through 13). The Direct APE is located on the Ferrelview, Missouri USGS 7.5-minute topographic maps.

4.1 Geology

The geology of the project area is mapped as the Douglas Group, Late Pennsylvanian-Upper Series-Virgilian Stage in age (USGS website). The Douglas Group consists of cyclic deposits, principally shale, sandy shale, sandstone, separated by limestone beds and minor coal. The Douglas Group's stratigraphic units includes the Stranger FM, and the Lawrence FM, and approximates a depth of 150 ft. max. This formation's primary rock type is shale followed by sandstone.

4.2 Soils

The soils traversed by the Direct APE are deep, moderately, somewhat poorly drained soils that typically have a black or dark grayish brown silt loam surface layer. These soils formed in loess more than 5 feet thick overlying limestone, shale or sandstone in some places. These upland soils have thin deposits of till overlying the bedrock in some places. These soil types fall under the mollisols soil taxonomy and are a mosaic of soils incorporated by the Higginsville series; however, the Udorthents-Urban land complex dominate the Direct APE (NRCS 2018; Appendix A - Figure 5; and Table 1). Mollisols have a mollic epipedon and a relatively high content of bases. This soil class typically has a dark covered surface horizon relatively high in organic matter content. Many also have an argillic, natric, or calcic horizon while some have a duripan or a petrocalcic horizon. Most formed under grass or savanna vegetation.

Table 1. Prominent Soil on the Direct APE

Soils	Setting	Surface Texture
Higginsville	On gently sloping to strongly sloping upland side slopes, ridgetops, and to a very limited extent, high stream terraces	Silt loam
Udorthents-Urban land complex	This complex consists of moderately well drained to excessively drained soils that have been disturbed by cuffing or filling, and areas that are covered by buildings and pavement	Fill material

4.3 Vegetation

The Direct APE is located in the tallgrass prairie, also known as the true prairie (Brown 1988). This biotic province's eastern boundary, where the project area is located is called the Prairie Peninsula and extends to the east into Illinois. This province is nestled between the Mixed Prairie to the east, the Oak-Hickory Forest to the north, the Mixed Deciduous Forest to the west, and the Transition Forest to the south. The floral species of the tallgrass prairie include the Eastern Redcedar (Juniperous virginiana), American Plum (Prunus americana), Black Cherry (Prunus serotina), Mexican Plum (Prunus mexicana), Prairie Crab Apple (Malus ioensis), Eastern Cottonwood (Populus deltoids), Blackjack Oak (Quercus marilandica), Bur Oak (Quercus macrocarpa), Smooth Sumac (Rhus glabra), and the Common Prickly-ash (Zanthoxylum americana).

4.4 Cultural Context

4.4.1 The Paleoindian Period (12,000 to 8,000 B.C.)

Human beings were well established in what is now Missouri by the end of the last Ice Age. Paleoindians, as archaeologists have named them, were well-adapted technologically and socially to climates, vegetation, and animal populations very different from current. Glaciers did not reach Missouri, but they caused the climate to be much cooler than present. During this period, Missouri may have demonstrated environmental characteristics similar to those associated with much of present-day Canada (O'Brien and Wood 1998).

Paleoindians' primary prey were mammoth, mastodon, and bison that grazed on the grasslands. These animals provided meat, skins, and other materials that could be used for food, clothing, tools, and many other needs. Archaeological evidence indicates that the Paleoindians adapted to a nomadic relationship with these animals; living in hunting camps only as long as sources of wood, workable stone, and game animals lasted. Populations were small and hunting camps were probably occupied only by extended families and those with no surviving family of their own (O'Brien and Wood 1998).

These first Missourians are known by their tools as the majority of the evidence of their existence during this span consists of the implements they used. Unlike flesh, bone, or wood, stone is durable and, therefore, lithic tools are the common indicators of the earliest people in an area. The fluted point is the artifact most associated with this

period. Clovis and Folsom fluted points have been discovered at a number of Missouri sites, including the Kimmswick site (Chapman 1980).

4.4.2 The Dalton Period (8,000-7,000 B.C.)

By about 8000 BC, the earth's warming trend and consequent glacial retreat had changed North America's environment. In general, the ways of the Paleoindian likely continued for no more than another one thousand years. Though Ice Age fauna had been dominated by large animals such as mammoths, their populations were dwindling because of climate changes and the consequent loss of food sources. These game animals migrated northward in pursuit of the receding glaciers, and the people who had depended on the ready accessibility of these large animals struggled to adapt to the new oak and chestnut forests that arose. They came to rely more on plants, nuts, and fruits and on fish and small animals such as deer, rabbit, and turkey. The most commonly identified tool from this period is the Dalton serrated point. These tools were used as spear points and knives. The archaeological evidence also indicates that Dalton people were processing food using grinding stones, mortars, and hammerstones (O'Brien and Wood 1998; Chapman 1975).

4.4.3 The Archaic Period (7,000-1,000 B.C.)

4.4.3.1 Early Archaic Period (7,000-5,000 B.C.)

During the Early Archaic period, humans learned about new foods and developed tools with a higher level of specialization for hunting, gathering, and processing these foods. Nurtured by the milder environment and longer growing season, populations grew rapidly. Rather than drifting, the Early Archaic people lived according to a pattern of seasonal movement and harvesting. They were essentially settled along this seasonal migration, usually building their most substantial camps in their wintering places. Thus, several residences were constructed strategically so that foods in different areas could be exploited when they were available. Social gatherings may have occurred during the Archaic period and different tribes met peaceably and hostilities were temporarily laid aside. These meetings may have served as informational exchanges, but they also helped affirm social networks and alliances (O'Brien and Wood 1998).

Population growth and settlement of areas around Missouri's rivers are evident in the Early Archaic. Archaeology suggests that people tended to camp along river terraces with fewer occupations away from these areas. Typically, sites dating to the Early Archaic period represent short-term hunting and collecting camps where people struck out to hunt and gather food (O'Brien 1995).

The high degree of craftsmanship evident in the Paleoindian period continues in well-made Early Archaic toolkits consisting of corner-notched hafted points. In Missouri, Early Archaic sites are represented by Graham Cave side notched, Hidden Valley stemmed, Rice lobed, Rice contracting stemmed, Rice lanceolates, and St. Charles notched projectile points. Other types of tools from this period include scrapers for working wood, bone, and hide; larger blades used as knives; and heavier items such as axes and nutting stones (mortar and pestle). Bone and antler were likely fashioned into a wide variety of tools. Being long, straight, and hard; deer bones from the limbs were undoubtedly used, sometimes as mounts fitted with blades, to form spearheads or knives. Although wood must have been commonly used, wooden artifacts have not survived in Missouri's acidic soils (Chapman 1975).

4.4.3.2 Middle Archaic Period (5,000-3,000 B.C.)

This period witnessed a gradual population increase throughout much of Missouri. This long period corresponds with another episode of environmental change. Climactically, the area was getting warmer, and prairies expanded into areas previously forested. In Missouri, Middle Archaic archaeological sites are more numerous than sites

from earlier periods, but still few in number. Stemmed projectile points and ground stone artifacts are most associated with this period, and sites increased in size and density of artifacts. Most of these sites appear to be similar in function, indicating that groups moved their residences frequently, continuously looking for food with less concern about how and where they would travel than their ancestors (O'Brien and Wood 1998).

Compared to the Early Archaic period, stone tools were simpler and toolkits less diverse in the latter portion of the Middle Archaic. Because of the unpredictable environment, people produced a few simple tools with diverse applications with expediency as the rule. Many of the stone blades found during the Middle Archaic have similar size and function, which is not likely the result of chance. This consistency is the result of people crafting socketed or slotted tools of bone, antler, or wood that could be fitted with standardized blades. The stark contrast in style and craftsmanship between Middle Archaic points and earlier ones has led some researchers to suggest a migration of people from the north into Missouri. The first solid archaeological evidence of the atlatl (Aztec for "spear thrower") use also comes in the Middle Archaic period, though it might have been used earlier (Ahler 1971; O'Brien and Wood 1998).

4.4.3.3 Late Archaic Period (3,000-1,000 B.C.)

This period in Missouri is broadly characterized by increases in population, social complexity, and long-distance trading networks. By the end of the Late Archaic period, two developments occurred that changed the way people lived in Missouri. The forests reclaimed much of the areas that had previously been prairie, and plants were domesticated. Sites from the Late Archaic period suggest that people stayed in the same spots for longer periods of time. With food in ready supply, they rarely needed to move camp. The scarcity of wild game in the forests may have fostered a comparatively simple, more mobile egalitarian society. Also, it is during this time, that the first pottery appeared in Missouri. No overnight change from a pre-ceramic, Late Archaic stage to ceramic Late Archaic stage is recognizable in the archaeological record. Instead, there was a slow adoption of pottery into the culture as people discovered that it was more suitable for cooking and holding water than the baskets that had, up to that time, served their purposes (O'Brien and Wood 1998).

Similar cultural and technological developments were happening throughout Missouri. Large village sites appeared for the first time, and the first elaborate burial rituals are seen in the archaeological record. In northeast Missouri; the Hatten mound, constructed during the Late Archaic period, is the oldest documented burial mound in the state (O'Brien and Wood 1998).

4.4.4 The Woodland Period (1,000 B.C.-A.D. 900)

4.4.4.1 Early Woodland Period (1,000-500 B.C.)

Stone tool technology seems to have held over from earlier periods during the Early Woodland period. Pottery also underwent a long period of acceptance. In the Early woodland period, the region did not appear to be a place of interaction. For instance, Black Sand incised ceramics are only found in the northern half of Missouri (Ahler 1971; Chapman 1980).

4.4.4.2 Middle Woodland Period (500 B.C.-A.D. 400)

This period is associated with widespread technological and social changes that also occurred in Illinois and Ohio. Stone technologies including Snyders, Mankers, Ensor, Castroville, Frio, Gary, and Dickson are seen for the first time. Additionally, pottery produced during this period was often tempered with crushed gravel or broken pot shards. The pottery was also often decorated with elaborate designs made from incising, stamping, paddle

boards, cords, and hollow reeds. Pottery was often used to create representations of animal and human figures (Chapman 1980; O'Brien and Wood 1998).

4.4.4.3 Late Woodland Period (A.D. 400-900)

Small triangular and stemmed projectile points fitted to arrow shafts are recovered for the first time on Late Woodland archaeological sites in Missouri. A hunter could shoot an arrow farther and more accurately than he could throw a spear. It was also an efficient means of hunting, since a single hunter could stalk and kill prey. Prior to that, the hafted stone tools of Archaic peoples and Paleoindians were used for spears, knives, and darts used with the atlatl (Chapman 1980).

The Late Woodland represents the most stable prehistoric period in terms of climate. It is thought that this general environmental stability resulted in a stable settlement pattern, but the archaeological information is not available to address this theory (O'Brien and Wood 1998).

Distributions of ceramic (pottery) styles and other artifacts suggest to archaeologists that Woodland Indians began to recognize territorial boundaries. The period apparently saw the expansion and subsequent interaction of groups of different regional traditions. Variations in pottery styles may reflect different tribal affiliations or cultural traditions. The more obvious boundaries may reflect early language groups of Indians later met by the Europeans. Intangible cultural elements cannot be recovered from archaeological deposits at any site; consequently, related questions about tribal affiliations, language, or religious practices will remain unanswered forever (Chapman 1980; O'Brien and Wood 1998).

4.4.5 The Mississippian Period (A.D. 900-1700)

During the Mississippian period, a distinct shift away from the way people lived in the Woodland period occurred within Missouri. In contrast to the relatively egalitarian, tribal organization of the Woodland period, regional Mississippian populations were typically organized into chiefdoms--territorial groups with hereditary, elite leadership classes. Only a revolution in agriculture may account for this change. The widespread cultivation of maize and beans fostered the Mississippian tradition with its population increases, surplus foodstuffs, enormous earthen platform mounds, more complex political organization, and the emergence of numerous powerful chiefdoms. New varieties of corn spread that could mature within a 120-day season, allowing two crops to be harvested annually facilitated this population growth. In addition to maize cultivation, the gathering of plant foods such as nuts; and the cultivation of sunflowers, beans, and squash contributed to a balanced diet. Presumably, religious ideas also spread throughout the area, supplanting what had been distinct regional traditions in many areas (Peregrine 2001).

Mississippian societies described by Europeans were organized along strict lines of social hierarchies determined by heredity or exploits in war. A spectacular group of artifacts, decorated with distinctive motifs, reflects a need for personal status identification and perpetuation of family lineages. Other artifacts bear witness to a widespread religion known as the Southern Cult. The ritual objects include discs used as gorgets (chest decorations) and conch shells decorated with incised designs such as human eyes, elaborate crosses, and sunburst motifs. Other objects include pottery vessels made in new and elaborate shapes, polished stone axes, painted textiles, embossed copper sheets, and pottery vessels in the shape of effigy heads, which may have been representations of ancestors (O'Brien 1995; Peregrine 2001).

The powerful towns and hundreds of villages and hamlets declined during the 13th and 14th centuries. As many of the original towns declined during the 13th and 14th centuries, new peoples moved into Missouri. Carrying

distinctive pottery and stone technologies, the Wah-Sha-She and Niutachi were quick to establish themselves in the area. These settlers were the ancestors of the Osage and Missouri peoples (O'Brien and Wood 1998).

4.5 A History of Platte County

Missouri was admitted to the Union in 1821 under the Missouri Compromise, and at that time, was the western most state in the Union. In the same year, Francois Chouteau, a Frenchman from St. Louis, came up the Missouri River and established a trading post approximately three miles below the great bend. Several French families joined Chouteau and formed the first non-Indian settlement in present day Kansas City. The trading post was subsequently flooded and built on higher ground in 1826 (KCMG 2018).

A second trading post was built approximately four miles south of Chouteau's post on the south side of the Missouri River by John Calvin McCoy. McCoy strategically located his post inland from the river near the Santa Fe Trail and platted the land in 1833. The new trading post was referred to as Westport. McCoy also acquired access to a rock ledge on the south shore of the Missouri River that formed a natural landing for river boats and soon replaced Independence, Missouri as a the primary supplies shipping center. McCoy's river landing was located on the Gabriel Prudhomme farm which he and 13 other investors purchased in 1838. By forming a town company, the investors decided to come up with a town name and settled on the Town of Kansas, named after the Kansa Indians who inhabited the area (Brown 1963; KCMG 2018).

By 1840, the Town of Kansas had 500 residents and was granted a charter by Jackson County on June 1, 1850. The town continued to prosper and covered area of one-square mile with a population of 2,500 residents by 1853. The Town of Kansas was incorporated by the State of Missouri in February 1853 and was renamed the City of Kansas (Brown 1963).

Missouri stayed in the Union during the Civil War. However, since the city's first settlers had arrived via the Missouri River from the South, considerable tension existed between pro-Union and pro-Confederate sympathizers. Skirmishes between pro- and anti-slavery forces began along the Missouri-Kansas border six years before the Civil War. The City of Kansas experienced the Civil War firsthand during the Battle of Westport Oct. 21-23, 1864 which is said to be the largest and most decisive Union-Confederate clash in Missouri. In Westport, the Union army routed the Confederates and broke their power as an army in the area (Lee 1996).

After the war, the Missouri Pacific railroad reached the City of Kansas and sparked a trade and development rivalry with nearby Independence, Missouri and Leavenworth, Kansas. In 1867, the City of Kansas gained a competitive edge and was awarded the Hannibal and St. Joseph Railroad Bridge project spanning the Missouri River. The arrival of the railroad and construction of the Hannibal and St. Joseph Railroad Bridge created a population boom. As a result, the livestock industry at the stockyards thrived by 1871 and became the second largest and busiest in the country behind Chicago (Glaab 1962).

In 1889, with a population of around 130,000, the city adopted a new charter and changed its name to Kansas City. The city's continued growth led to the annexation of Westport in 1897. By 1909 another annexation was approved by voters that more than double the size of the City to 59.7 square miles and boasted an estimated 248,000 residents (CPDD 2013).

From 1890 to 1930 Kansas City was primarily run by the Pendergast brothers, James and Tom. James had sat on the City Council for 18 years before his death in 1912 while his brother Tom continued the family rein for an additional 27 years. During this period, the construction of a new 29-story City Hall, the Jackson County Courthouse, Municipal Auditorium, the 700-acre Municipal Airport, and several transportation projects occurred.

Tom's rise to power was marred by high crime rates and unethical business practices which ultimately led to his indictment by a federal grand jury for income tax evasion and imprisonment (Larson and Hulston 1997).

In the mid-1940s, Mayor John B. Gage and City Manager L. P. Cookingham began to annex land to expand Kansas City. The city increased its geographical size five-fold in 1940, with annexation programs continuing through the 1970s. This led to the city encompassing more than 316 square miles and a population of 435,000 residents. While most cities shrank after World War II due to population shifts from city to suburban lifestyles, Kansas City retained its population. Due to the annexations, the city now included parts of four counties: Jackson, Clay, Platte and Cass. A side effect of the annexations was a significant decrease in population density.

The Kansas City Downtown Airport, which was built in the Missouri River bottoms during the Pendergast era lacked room for expansion. The airport also had several aeronautical safety issues. Jets landing and departing the airport had to avoid 200-foot high bluffs and neighborhoods located at the southern end. The Trans-Continental and Western Air (TWA), which was headquartered in Kansas City at the time, had an overhaul base with a landing strip surrounded by open farm land 15 miles north of downtown in rural Platte County, Missouri. This facility was also referred to as Mid-Continent International (MCI) Airport (Roe 2018).

In 1966 voters approved a $150 million bond issue to move the Kansas City Downtown Airport to the expanded Mid-Continent International Airport. Interestingly, a city built on annexation did not annex the area. Instead the small town of Platte City, Missouri initially annexed the airport. After a series of court battles, Kansas City eventually annexed the airport and hired architectural firm Kivett and Myers to design the new facility. Construction began on the three-terminal "clover leaf" layout in the 1960s and opened in 1972. The new facility was named Kansas City International Airport; however, the "MCI" abbreviation persisted due to its existence as an airport on established navigational charts.

On November 7, 2017, two weeks after KCI's 45th anniversary, Kansas City Missouri voters approved a new privately financed airport facility that will combine the three "clover leaf" terminals into a single terminal (Vockrody 2017).

5.0 METHODS

5.1 Background Review

Golder performed a background literature review through the Missouri Department of Natural Resources (MO DNR) Archaeology Viewer, to determine if the Direct APE had been previously surveyed for cultural resources or if any archaeological sites are located within the Direct APE. To conduct this review, Golder reviewed the Ferrelview USGS 7.5-minute topographic quadrangle maps at the MO DNR Archaeology Viewer. The review followed the nine-point checklist recommended by the MO SHPO. Aerial photographs, Bureau of Economic Geology Maps, and the Natural Resources Conservation Service's (NRCS) Web Soil Survey were also examined. These sources provided information on the nature and location of previously-conducted archaeological surveys and previously-recorded cultural resource sites.

5.2 Field Methods

To conduct the archaeological survey, Golder archaeologists walked the proposed Direct APE utilizing extensive surface exposures and various natural, artificial profile cuts, shovel testing and backhoe trenching to determine the presence and potential for cultural resources. The intensity of subsurface investigations complied with standards recommended by the MO-DNR/MO-SHPO (MO-SHPO 2018), and the RPA standards.

For the most part, the Direct APE is located on a level truncated terrain associated with either active airport runways, terminals, administrative and aviation buildings, roadways, retention ponds, and fuel tanks, or undulating manicured expanses that have been truncated of topsoil and capped with imported fill (Appendix B - Photographs 1 through 13) with no to a shallow silty loam lens over a mottled clay substratum or fill material and; therefore, the number of Shovel Tests (ST) was reduced. As will be addressed in detail in the results section, the modern disturbances in the Direct APE have minimized the potential for buried cultural deposits. Subsurface STs were performed in areas that (a) did not show signs of extensive prior disturbance, (b) consisted of soils believed to hold the potential for buried deposits close enough to the surface to be detected through this method of subsurface investigation, and (c) appeared to be high probability areas such as pediments and terraces. Areas with a low potential for buried deposits, particularly disturbed areas, were not shovel tested. Portions of the Direct APE lacked such potential, and therefore, the number of shovel tests excavated was reduced. As will be addressed in detail in the results section, slope, redeposited soils, and areas of modern disturbance minimized the potential for intact buried cultural deposits.

Shovel tests were excavated in natural levels until basal clays were encountered or an imported fill or truncated horizon was attained. Excavated soil was screened through ¼-inch mesh to retrieve any cultural materials that might be present. The location of each shovel test was plotted using a hand-held GPS receiver, and each test was recorded on a standardized form to document the excavations.

Backhoe trenches were generally 6–8 meters in length and 1 meter wide. Trenches exceeding 5 feet in depth met Occupational Safety and Health Administration (OSHA) safety regulations. All trenching was monitored by an experienced geoarchaeologist while excavations were underway. Subsequent to each trench excavation, the walls were examined by the geoarchaeologist for cultural materials, anomalies, and geomorphic data. Stratigraphic profile drawings with soil descriptions were recorded for each trench. All OSHA safety protocols were utilized in these trenches and the entire process was thoroughly photographed. All trenches were backfilled and leveled upon completion of excavation and recording.

Finally, during the survey of the Direct APE, the archaeological crew photographed the environmental conditions and any disturbances within the Direct APE.

6.0 RESULTS

6.1 Background Review

A background review indicates that six previous archaeological investigations have occurred within a one-mile radius of the Direct APE (Table 2). These investigations occurred from 1979 to 2008. Of these investigations, the Direct APE is partially overlapped with manuscripts PL-10.

The background review further indicates that previously recorded sites are located within a one-mile radius of the Direct APE (Table 3). Only one site, PL1507, was NRHP eligible. None of these previously recorded cultural resources, historic sites, or prehistoric sites are located within the Direct APE.

Table 2. Previous Investigations within 1-Mile of the Direct APE

Survey ID	Survey Type	Year Conducted – Survey Company	Cultural Findings
PL-10	Preliminary Reconnaissance	1979-03 - University of Kansas	31 sites of unknown cultural affiliation
PL-80	Phase I Cultural Resources Study	2001-10 - Don Dycus, RPA, LLC	None
PL-122	Cultural Resource Investigations Phase I Survey	2007-03 - Environmental Research Center	None
PL-126	Phase I Survey	2007-06 - Environmental Research Center of Missouri, Inc	4 sites of unknown cultural affiliation
PL-131	Phase I Survey	2007-03 - Environmental Research Center of Missouri, Inc.	None
PL137	Phase I Survey	2008-04 - Environmental Research Center of Missouri, Inc.	15 low density prehistoric lithic scatter, 66 historic archaeology sites

Table 3. Previously Recorded Sites within 1-Mile of the Direct APE

Site Number	Site Category	Location	Cultural Assemblage	Eligibility	Within Direct APE
PL205	Historic	Ridge	Habitation	Not eligible	No
PL206	Historic	Ridge	Artifact scatter	Not eligible	No
PL207	Prehistoric	“other”	“Middle to late Ceramic, Kill site, KUMA, Upland”	Not eligible	No
PL208	Prehistoric	Ridge	Lithic scatter	Not eligible	No
PL209	Prehistoric	Ridge	Lithic scatter	Not eligible	No
PL210	Prehistoric	Slope	Lithic scatter	Not eligible	No
PL1417	Historic	Ridge	Artifact scatter	Not eligible	No
PL1418	Historic	Slope	Artifact scatter	Not eligible	No
PL1427	Historic	Slope	Artifact scatter	Not eligible	No

PL1428	Historic	Slope	Artifact scatter	Not eligible	No
PL1431	Prehistoric	Ridge	Lithic scatter	Not eligible	No
PL1432	Historic	Hill	Habitation	Not eligible	No
PL1433	Prehistoric	Ridge	Lithic scatter	Not eligible	No
PL1434	Historic	Ridge	Habitation	Not eligible	No
PL1435	Historic	Slope	Habitation	Not eligible	No
PL1436	Historic	Ridge	Habitation	Not eligible	No
PL1437	Historic	Ridge	Habitation	Not eligible	No
PL1438	Historic	River/stream terrace	Habitation	Not eligible	No
PL1439	Historic	Ridge	Habitation	Not eligible	No
PL1440	Prehistoric	Hill	Lithic scatter	Not eligible	No
PL1441	Prehistoric	Ridge	Lithic scatter	Not eligible	No
PL1442	Prehistoric	Ridge	Lithic scatter	Not eligible	No
PL1443	Prehistoric	Ridge	Lithic scatter	Not eligible	No
PL1444	Historic	Slope	Habitation	Not eligible	No
PL1445	Historic	Hill	Habitation	Not eligible	No
PL1446	Historic	Slope	Habitation	Not eligible	No
PL1447	Historic	Hill	Habitation	Not eligible	No
PL1448	Historic	Hill	Habitation	Not eligible	No
PL1449	Historic	Hill	Habitation	Not eligible	No
PL1450	Historic	Hill	Habitation	Not eligible	No
PL1451	Prehistoric	River/stream terrace	Lithic scatter	Not eligible	No
PL1452	Prehistoric	River/stream terrace	Lithic scatter	Not eligible	No
PL1453	Historic	Hill	Habitation	Not eligible	Np
PL1454	Historic	Hill	Habitation	Not eligible	No
PL1455	Historic	Hill	Habitation	Not eligible	No
PL1456	Historic	Hill	Habitation	Not eligible	No

PL1457	Historic	River/stream terrace	Habitation	Not eligible	No
PL1458	Historic	Hill	Habitation	Not eligible	No
PL1459	Historic	Hill	Habitation	Not eligible	No
PL1460	Prehistoric	Ridge	Lithic scatter	Not eligible	No
PL1461	Historic	Hill	Habitation	Not eligible	No
PL1462	Historic	Hill	Habitation	Not eligible	No
PL1463	Prehistoric	Slope	Lithic scatter	Not eligible	No
PL1464	Historic	Hill	Habitation	Not eligible	No
PL1465	Historic	Ridge	Habitation	Not eligible	No
PL1466	Historic	Ridge	Habitation	Not eligible	No
PL1467	Historic	Ridge	Church – no longer extant	Not eligible	No
PL1468	Historic	Ridge	Habitation	Not eligible	No
PL1469	Historic	Ridge	Habitation	Not eligible	No
PL1470	Historic	Ridge	Habitation	Not eligible	No
PL1471	Historic	Ridge	Habitation	Not eligible	No
PL1472	Prehistoric	Ridge	Lithic scatter	Not eligible	No
PL1476	Historic	Ridge	Habitation	Not eligible	No
PL1477	Historic	Ridge	Habitation	Not eligible	No
PL1478	Historic	River/stream terrace	Habitation	Not eligible	No
PL1479	Prehistoric	Ridge	Lithic scatter	Not eligible	No
PL1480	Historic	Ridge	Habitation	Not eligible	No
PL1481	Historic	Ridge	Habitation	Not eligible	No
PL1482	Historic	Slope	Habitation	Not eligible	No
PL1483	Historic	Slope	Habitation	Not eligible	No
PL1484	Historic	Ridge	Habitation	Not eligible	No
PL1485	Historic	Slope	Habitation	Not eligible	No
PL1486	Historic	Hill	Habitation	Not eligible	No

PL1487	Historic	Ridge	Habitation	Not eligible	No
PL1488	Historic	Ridge	Habitation	Not eligible	No
PL1489	Historic	Ridge	Habitation	Not eligible	No
PL1490	Historic	Ridge	Habitation	Not eligible	No
PL1491	Historic	Ridge	Habitation	Not eligible	No
PL1492	Historic	Slope	Habitation	Not eligible	No
PL1493	Historic	Ridge	Habitation	Not eligible	No
PL1494	Historic	Ridge	Habitation	Not eligible	No
PL1495	Historic	Ridge	Habitation	Not eligible	No
PL1496	Historic	Hill	Habitation	Not eligible	No
PL1498	Historic	Ridge	Habitation	Not eligible	No
PL1499	Historic	Ridge	Habitation	Not eligible	No
PL1500	Historic	Ridge	Habitation	Not eligible	No
PL1501	Historic	Ridge	Habitation	Not eligible	No
PL1502	Historic	Ridge	Habitation	Not eligible	No
PL1504	Historic	Slope	Habitation	Not eligible	No
PL1505	Historic	Ridge	Habitation	Not eligible	No
PL1506	Historic	Ridge	Habitation	Not eligible	No
PL1507	Historic	Ridge	Habitation	NRHP eligible	No
PL1508	Historic	Ridge	Habitation	Not eligible	No
PL1512	Prehistoric	River/stream terrace	Lithic scatter	Not eligible	No

6.2 Field Survey

On June 12 through June 18, 2018, Golder archaeologists conducted an intensive pedestrian survey of the accessible Direct APE. These investigations encountered fair to good ground surface visibility that ranged from 40–75 percent. Disturbances observed within the Direct APE include vegetation clearing, mechanically truncated soils, earthen berms, buried pipeline and utility corridors, culverts, numerous paved road corridor crossings, on-going construction vehicular traffic, fences, cut banks, modern refuse, and riprap associated with the stabilization of natural erosion on named and unnamed perennial and ephemeral drainage channels.

A total of 149 STs were excavated with the Direct APE (Figures 6, and 6a-6j). STs were excavated to an average depth of 34.9 cmbs and were terminated at the extremely compact basal clays or imported fill material (Data from the shovel tests are provided in Appendix C). Soil colors ranged from light gray to black, and soils ranged in texture from a silty clay loam to clay. Most of the shovel tests included silty clay loams overlying mottled compact clays with a mixture of imported fill materials ranging from crushed gravels, concrete, asphalt, plastics, and paper (Appendix B - Photographs 14 and 15). The soils from STs excavated over the 40-foot amsl contour interval were mostly shallow in depth (cmbs) with mottled clays nearer to the surface as evidence of extensive mechanical truncation, and horizontal displacements due to surface alterations associated with KCI Airport's construction and expansion through the years. All of the 149 STs were negative for cultural materials.

6.2.1 Backhoe Trenches

To evaluate the potential of encountering buried cultural resources in the Direct APE, the MO-SHPO suggested that an archaeological survey, with deep testing as deemed appropriate, should be conducted. Using a tractor mounted backhoe, eight trenches were dug in eight separate locations within the Direct APE. Each trench averaged 6 m long, 0.7 m wide, and provided continuous subsurface exposures over diverse areas (Figure 7; Table 4; Appendix B - Photographs 16, 17 and 18). Trench depths varied considerably and were dependent on the texture of underlying deposits and slope. In most cases the underlying surface consisted of compact clays. No cultural materials were encountered in any of the eight trenches. The reasoning for not placing more trenches within the Direct APE was due to the fact that this is an active international airport with plenty of air traffic that utilize the tarmacs. Also, there are limited areas that do not have either poured concrete and/or buried utility lines that provide real-time communications and interactions with all aspects of the KCI Airport's safety and response systems (See Appendix D Supplemental Information).

The areas selected for trenching were chosen after first examining the entire Direct APE and ascertain boundaries of the former meander locations from aerial photographs, and historic USGS topographic 6.5-minute maps. This was followed by examining the KCI Airport's manifestation on the landform to see where remnants of the previous landform could be found within the Direct APE. Once those features had been delineated the trench locations were selected. Those features most likely to hold the most promise for containing intact soil information for landform reconstruction were examined.

Table 4. Trench Descriptions by Location, Dimensions, and Landform within the Direct APE

Trench No.	UTM (Zone 15)	Trench Length (m)	Trench Depth (m)	Historical Landform/Airport Placement
1	E 352420; N 4351494	7	2	Terraced slope/Northeast of KCI Tower, adjacent to telecommunication towers
2	E 352369; N 4351467	3.5	1.8	Terraced slope/Northeast of KCI Tower, adjacent to telecommunication towers
3	E 352617; N 4350989	7	1.7	Ridgeline bench/Northeast of Terminal C
4	E 351259; N 4350735	6.5	1.8	Drainage channel/Southwest of the KCI Fire Station
5	E 351232; N 4350955	6.5	2.1	Drainage terrace/Northwest of the KCI Fire Station
6	E 351616; N 4351737	6	2.3	Terrace bench/North of Terminal A
7	E 351917; N 4351582	6	2.3	Drainage terrace/Northeast of Terminal A
8	E 352426; N 4352088	6	1.9	Terrace/Within the meridian of LP Cookingham Drive, north of Paris Street and south of Bern Street

6.2.1.1 Trench 1

Trench 1 was placed in this terraced sloped landform to confirm the identity of upland deposits associated with the Higginsville series, and it also might yield remnants of the previous landform. The profile showed an extremely stiff and compact mottled clay (gray, grayish brown, very dark gray, brown, and dark yellowish brown in color) intermixed with bricks, asphalt, concrete, metal and wood fragments. This area had been used by KCI Airport as a deposit for building material that was moved to this location from other areas within the airport that had been razed. Rich Weems, KCI Airport, Aviation Manager (personal communication 2018) confirmed that the fill material had been contoured into the landform once transported to this location and sodded. The trench supports this statement as do numerous shovel tests and Trench 2 which were dug in this area.

6.2.1.2 Trench 2

Trench 2 was also placed in this terraced sloped landform to confirm the identity of upland deposits associated with the Higginsville series, and it also might yield remnants of the previous landform. The profile showed an unconsolidated depositional zone consisting mostly of crushed concrete (light gray in color) and imported gravels intermixed with silt fabric, large concrete and asphalt slabs, metal, aluminum Pepsi cans of the 1970's era, and discarded clothing material and wood fragments. This area is within the location used by KCI Airport as a deposit for building material that was moved to this location from other areas within the airport that had been razed. The trench supports this statement as do numerous shovel tests and Trench 1 which were dug in this area.

6.2.1.3 Trench 3

Trench 3 was placed in this ridgeline bench landform to confirm the identity of upland deposits associated with the Higginsville series, and it also might yield remnants of the previous landform. The profile showed a medium stiff uniform consolidated clay (brown in color). This area had been used by KCI Airport as a manicured grass island to buffer an active runway from Terminal C. The clay horizon is homogeneous, with no inclusions and capped with a thin sod cap lens that has crushed gravels intermixed. It is likely that this clay horizon in the vicinity of Trench 3 was not truncated during the airport's placement. The numerous shovel tests dug in the vicinity of this trench were mottled, and had gravels and other modern material intermixed. The immediate area has berms, buried utility corridor, and makes this area a peninsula associated with modern airport disturbances. This trench does support that few areas yield the possibility of the landform remnants prior to the airport's placement.

6.2.1.4 Trench 4

Trench 4 was placed in this drainage channel landform to confirm the identity of upland deposits associated with the Higginsville series, and it also might yield remnants of the previous landform. The profile showed a radically

undulating stiff and compact clay horizon (grayish brown in color), sparsely overlaid by a sloping, undulating and extremely compact mottled silty clay (dark gray and very dark gray in color), capped with a mostly level stiff and compact mottled clay (yellowish brown and light yellowish brown in color), which in turn was overlaid by a sod cap consisting of a silty clay with crushed gravels intermixed. It is likely that this undulating clay horizon within Trench 4 was mechanically truncated, and horizontally displaced during the airport's tarmac construction. The immediate area is within the vicinity of runway intersections and buried utility corridors associated with the airport's disturbances. This trench does show disturbances likely associated with the leveling of the landform, and the importation of fill to support construction on a firm substrate.

6.2.1.5 Trench 5

Trench 5 was placed in this drainage terrace landform to confirm the identity of upland deposits associated with the Higginsville series, and it also might yield remnants of the previous landform. The profile showed an undulating stiff and compact clay horizon (dark grayish brown in color), sparsely superimposed by a slightly sloping, stiff and compact mottled silty clay (dark gray and very dark gray in color), overlaid with a mottled stiff and compact clay (yellowish brown in color), which in turn was covered by a sod cap consisting of a silty clay with crushed gravels intermixed. It is likely that these mottled silty clay and clay horizons within Trench 5 are the remnants of a mechanical horizontal displacement of soils during the airport's tarmac construction. The immediate area is within the vicinity of runway intersections, the KCI Airport's Fire Department facility, and numerous buried utility corridors associated with the airport's disturbances. This trench does shown disturbances likely associated with the leveling of the landform, and the importation of fill to support construction on a firm substrate; although, less conspicuously than Trench 4.

6.2.1.6 Trench 6

Trench 6 was placed in this terrace bench landform to confirm the identity of upland deposits associated with the Higginsville series, and it also might yield remnants of the previous landform. The profile showed a thoroughly mottled and consolidated still clay horizon (brown, light gray, very dark gray, and yellowish red in color) with metal fragment presences, overlaid by a sod cap consisting of a loamy silt with crushed gravels intermixed. It is likely that this mottled clay horizon within Trench 6 the remnants of a mechanical horizontal displacement of soils during the airport's original construction. The immediate area is within the vicinity of Terminal A's runway corridor and buried utility corridors associated with the airport's disturbances. This trench does shown disturbances likely associated with the leveling of the landform, and the importation of fill to support construction on a firm substrate.

6.2.1.7 Trench 7

Trench 7 was placed in this drainage terrace landform to confirm the identity of upland deposits associated with the Higginsville series, and it also might yield remnants of the previous landform. The profile showed a radically undulating and sloping stiff and compact clay horizon (dark grayish brown in color), superimposed by a sloping and undulating, stiff silty clay (yellowish brown in color), overlaid with a sloping, unconsolidated, medium stiff and mottled loamy sandy clay (light brownish gray in color), which in turn was overlaid by a sod cap consisting of a silty clay with crushed gravels intermixed. It is likely that these sloping and undulating horizons within Trench 7 were mechanically truncated, and horizontally displaced during the airport's construction associated with Terminal A. The immediate area is within the sloped landform which comes off the tarmac on the northeastern extent of Terminal A and drops down into the altered terraced slopes of Todd Creek's old drainage channel. The current landform is within the locality of a concrete apron used by Terminal A, and numerous buried utility corridors associated with the airport. This trench does shown disturbances likely associated with the leveling and contouring of the landform, and the importation of fill to support a stable and firm substrate.

6.2.1.8 Trench 8

Trench 8 was placed in this terrace landform to confirm the identity of upland deposits associated with the Higginsville series, and it also might yield remnants of the previous landform. The profile showed an undulating and sloping stiff and compact mottled clay horizon (pale yellow, and gray in color), overlaid by a sloping and undulating, consolidated medium stiff, and medium coarse silty sand (yellow in color), superimposed by an undulating, mottled silty clayey loam with medium coarse sand intermixed (pale yellow and dark gray in color), which in turn was covered by a sod cap consisting of loam. Rich Weems, KCI Airport, Aviation Manager (personal communication 2018) confirmed that the area within the vicinity of Trench 8 had been modified due to the beautification, and contouring of the highway meridian with the introduction of soils from other areas to both help support the trees in the general vicinity, and also during the LP Cookingham Drive's highway expansion and modification during the airport's ingress and egress construction. These imported materials were contoured into the landform once transported to this location and sodded. The trench supports this statement as do numerous shovel tests near Trench 8 which were dug in this area. The immediate area is within an undulating and contoured sloped landform associated with modern art sculptures place within the airport's facility entrance and exit, which also has buried utility corridors associated with the airport. This trench does shown disturbances likely associated with the leveling and contouring of the landform, and the importation of fill to support a stable and firm substrate.

6.2.2 Geologic Boring

In the first quarter of 2018, TSi Geotechnical, Inc. (TSi) completed a subsurface exploration and geotechnical engineering evaluation to assist with the proposed design and construction of the new airport terminal, parking garage and pavements at the KCI Airport (TSi 2018). This study conducted for a geotechnical engineering evaluation, which consisted of numerous borings, encountered existing fill extending to depths of approximately 5.4 to 16.7 meters. These are depths that far exceeded the methodology conducted by this Phase I archaeological survey. The existing fill encountered was placed between the later parts of the 1960s to the early 1970s.

The 22 borings completed by TSi, and not done as part of this Phase I Archaeological survey's deep testing phase, show that the existing KCI Airport and the proposed location of the new terminal rests on mostly imported material that was used to make the previously existing landform level to accommodate the placement of the existing airport. The materials from the borings were saved and stored on Airport property. The materials from the borings, although clearly not gotten by a cultural resource firm, but rather a geotechnical engineering company were nevertheless reviewed. No cultural resource material was found in the boring samples. See Appendix D Supplemental Information for locations of the borings.

7.0 SUMMARY AND RECOMMENDATIONS

Golder conducted a Phase I archaeological survey for the proposed replacement terminal EA at KCI Airport in south-central Platte County, Missouri. In compliance with Section 106 of the NHPA, the work was done to determine whether the proposed undertaking would adversely effect significant cultural resources. The work included an archaeological background records review and an intensive pedestrian survey with shovel testing and mechanical trenching.

The background review included a one-mile radius encompassing of the Direct APE. The review revealed the area has been previously surveyed for archaeological resources for six separate projects. One of these surveys encompassed a small portion of the proposed Direct APE. The background review also indicated that 28

previously recorded sites are within one-mile of the Direct APE. None of these resources are within the Direct APE.

The suggested techniques by the MO-DNR/MO-SHPO (MO-SHPO 2018) for both low surface visibility and previously undisturbed/unplowed areas, and previously plowed/disturbed with high surface visibility areas were employed. Ground surface visibility varied throughout the Direct APE. Therefore, transect intervals of 15 meters were used and shovel tests (ST) were placed approximately 15 meters apart. Existing exposures (cut banks, gravel pits, road cuts, and mechanical scars) as well as hand-excavated STs and mechanically excavated trenches provided quick access to the subsurface in areas of the Direct APE thought to have the potential for cultural resources. A total of 149 STs were excavated in areas with the potential for cultural deposits and areas with the least amount of topographic change depicted in historic United States Geologic Survey (USGS) maps prior to airport construction. The majority of the shovel tests lacked an organic horizon or roots, and most showed evidence of prior disturbances (lacking a top soil, truncation, mottled, reverse stratigraphy, or having imported gravels and angular concrete fragments). All of the 149 STs and eight trenches were negative for cultural materials.

Based on the results of this 2018 survey, development within the Direct APE will have no effect on known cultural resources. In accordance with 36 CFR 800.4, Golder has made a reasonable and good faith effort to identify archaeological and historic properties within the Direct APE. There were areas that were not appropriate for shovel testing or deep testing. These areas include paved and currently used as apron or aircraft movement areas, and areas found to have anywhere from 30 to 60 feet of fill material used in the original construction of the terminals and Airport in the early 1970's. Therefore it is recommended that an Unanticipated Discovery Plan be produced to assist with any inadvertent cultural resource discovery that may occur during subsurface disturbances associated with the Proposed Action. Furthermore, it is recommended that an archaeological monitor be present to accommodate public concerns during initial ground disturbing activities where those activities are being conducted at depths below the fill material used in the original terminal construction in the 1970's.

Signature Page

Golder Associates Inc.



David Wilcox, M.A., RPA
Senior Project Archaeologist



Jeremy L. Yeglin, P.E.
Associate, Senior Engineer

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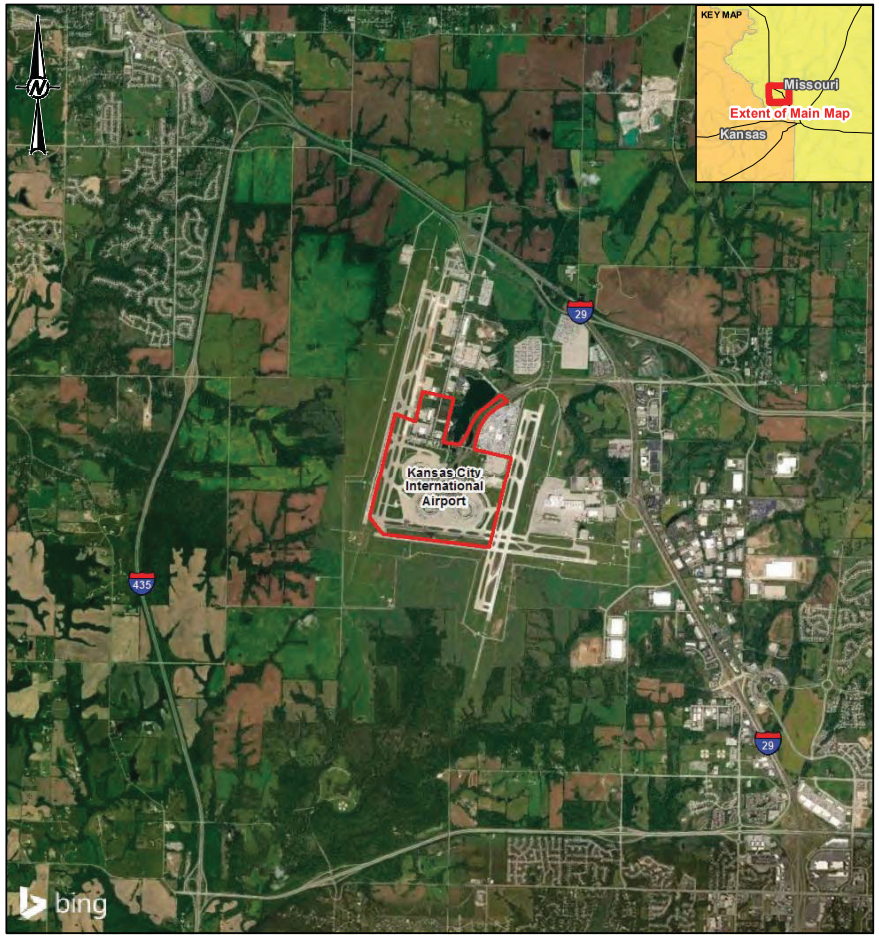
Figures



LEGEND

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Miles

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NOTE(S)

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COORDINATE SYSTEM: UTM ZONE 15 VERTICAL DATUM: CGVD28

CLIENT
LANDRUM & BROWN

PROJECT
KC INTERNATIONAL AIRPORT ARCHAEOLOGY

TITLE
SITE LOCATION

CONSULTANT
GOLDER

YYYY-MM-DD	2018-06-29
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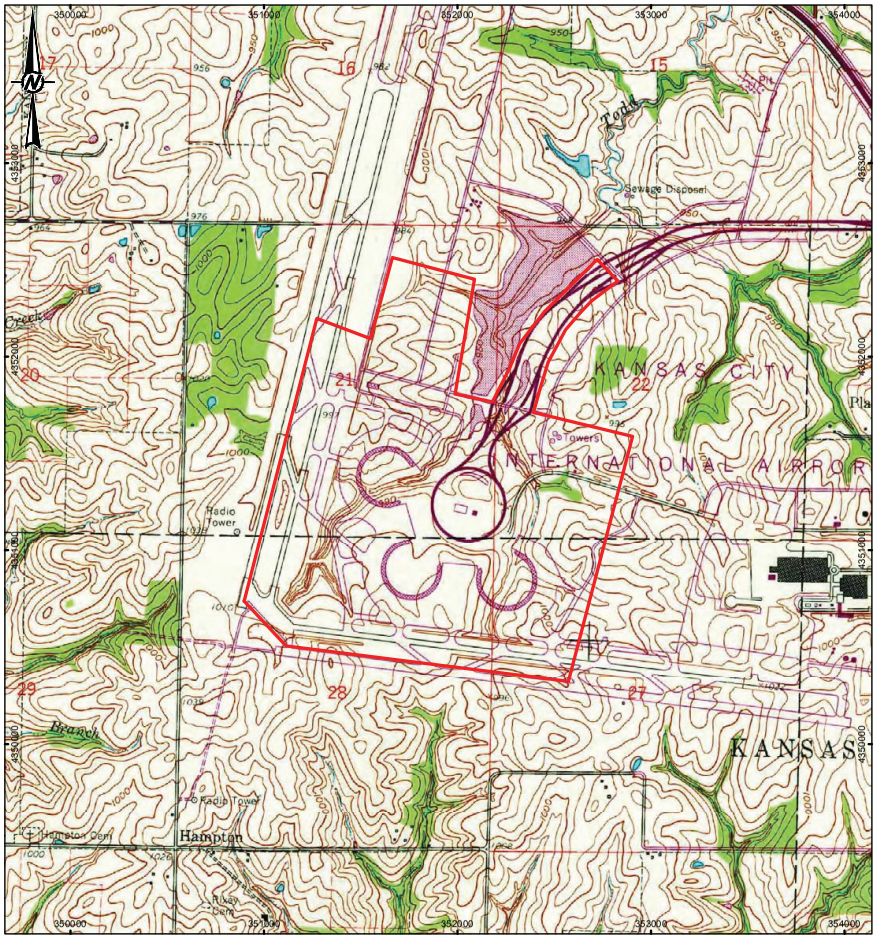

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CLIENT
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PROJECT
KC INTERNATIONAL AIRPORT ARCHAEOLOGY

TITLE
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CONSULTANT
GOLDER

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DESIGN	D. WILCOX
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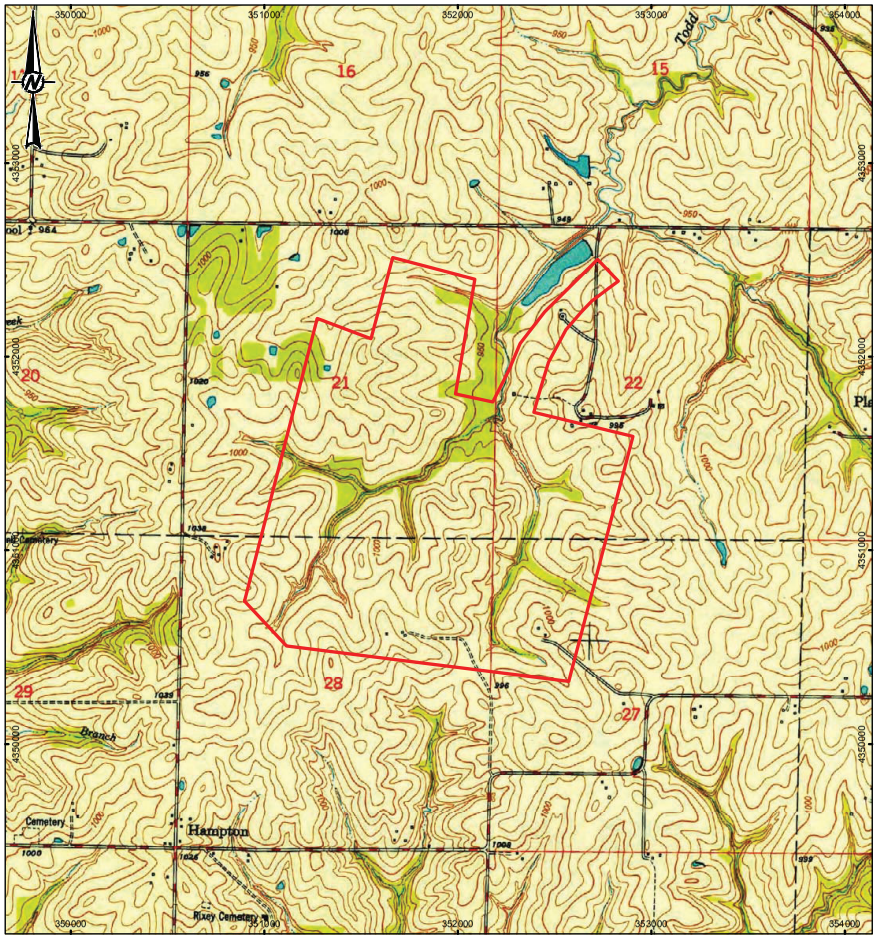

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PROJECT
KC INTERNATIONAL AIRPORT ARCHAEOLOGY

TITLE
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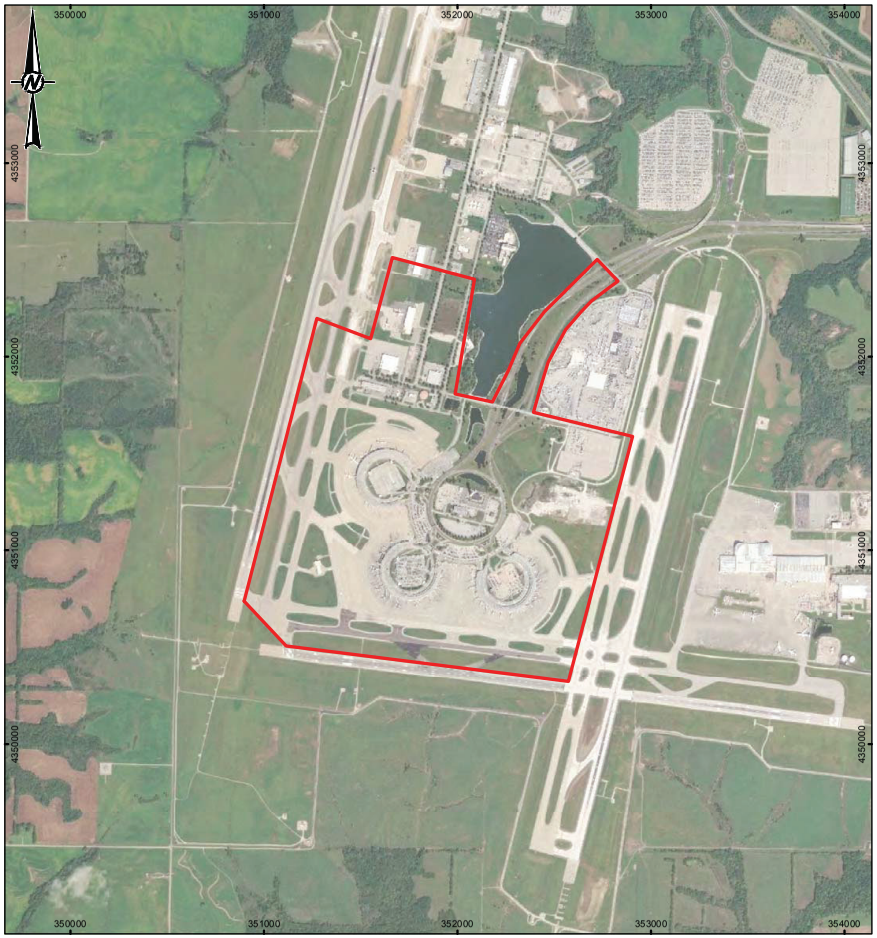

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PROJECT
KC INTERNATIONAL AIRPORT ARCHAEOLOGY

TITLE
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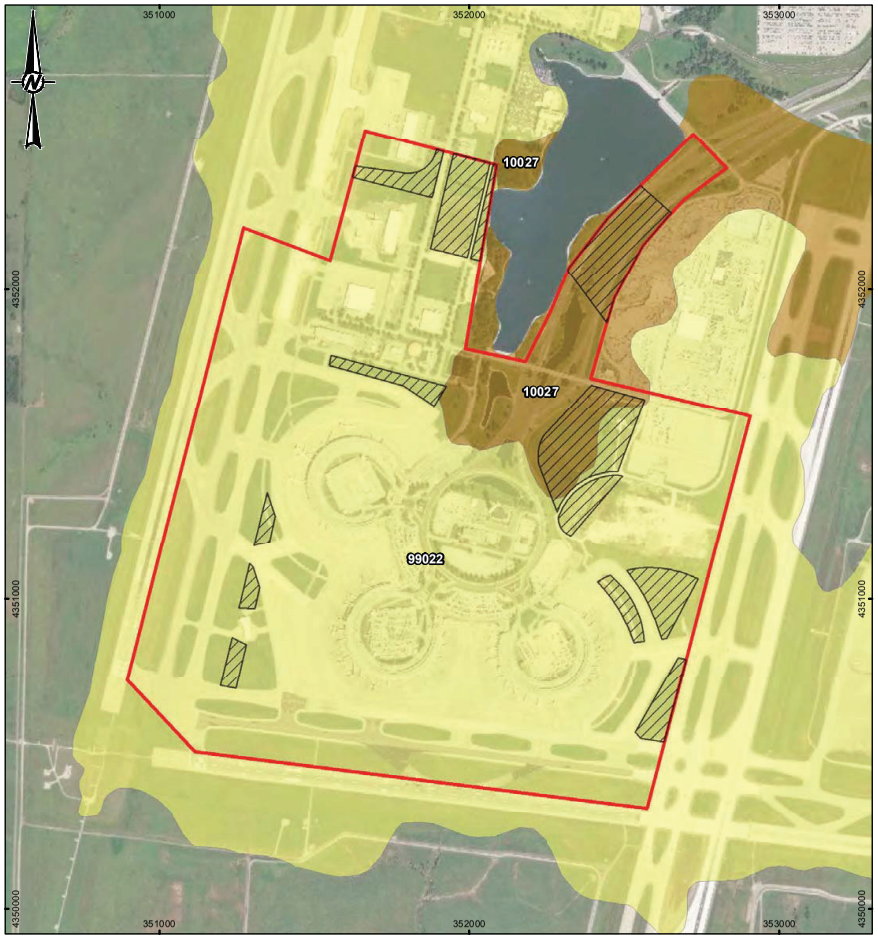

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99022: UDORTHENTS-URBAN LAND COMPLEX

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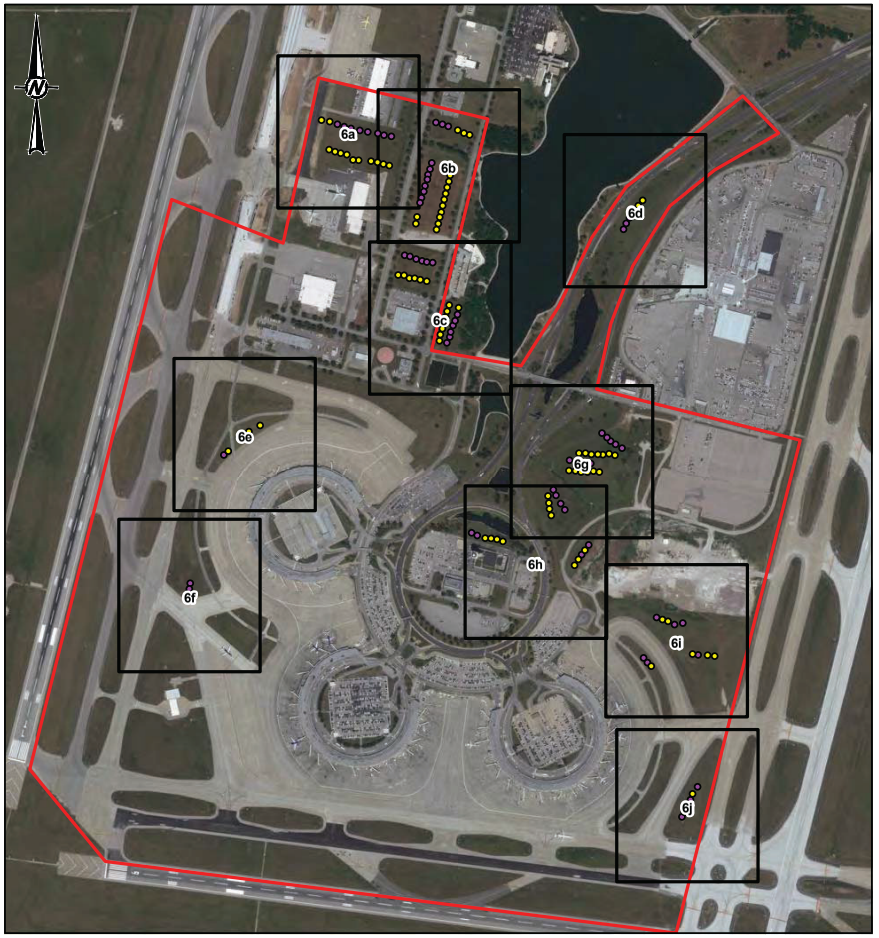

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NOTE(S)

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- Shovel Test-David

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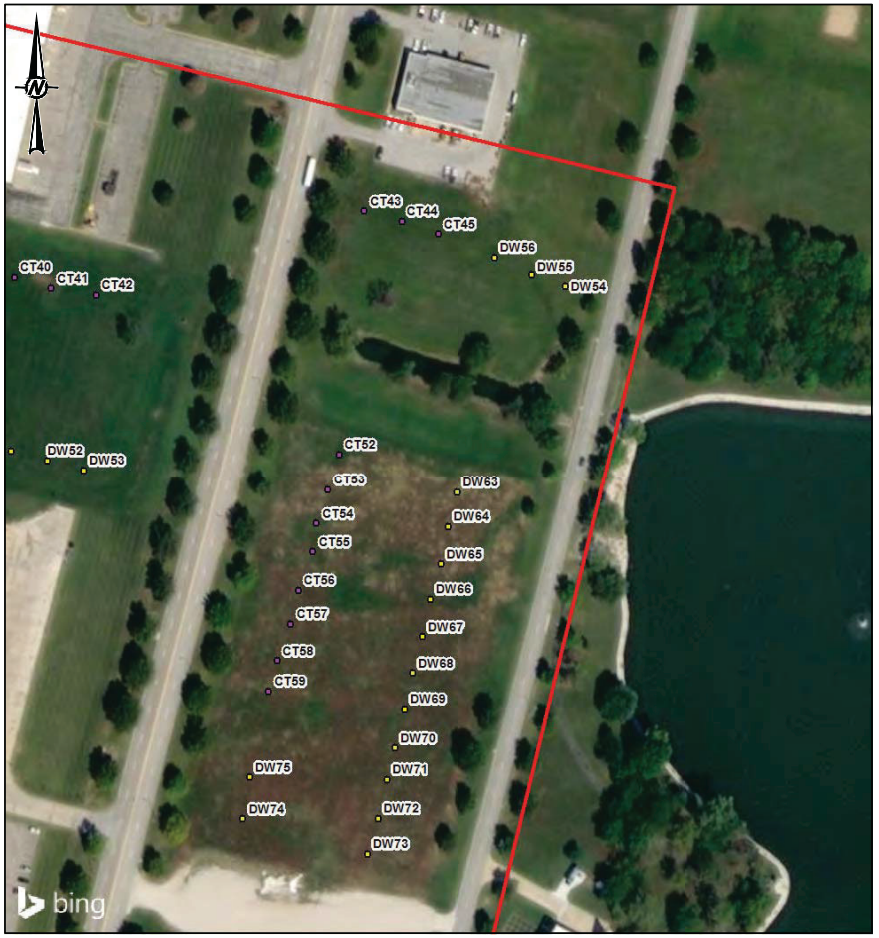

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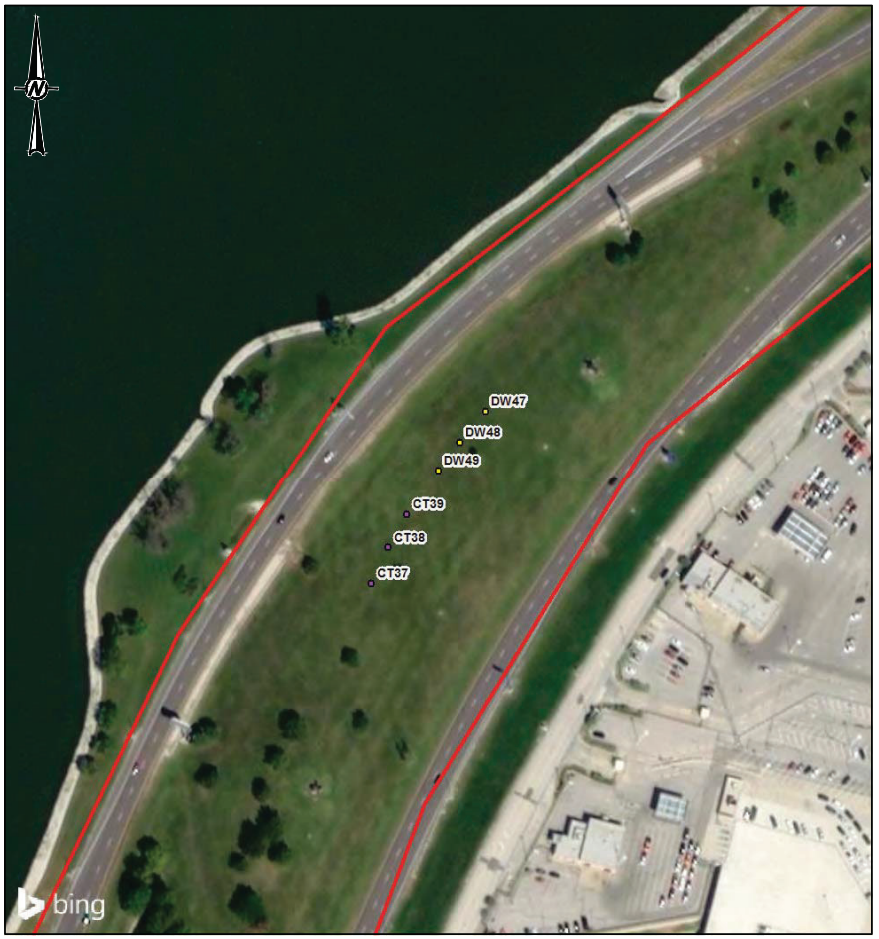

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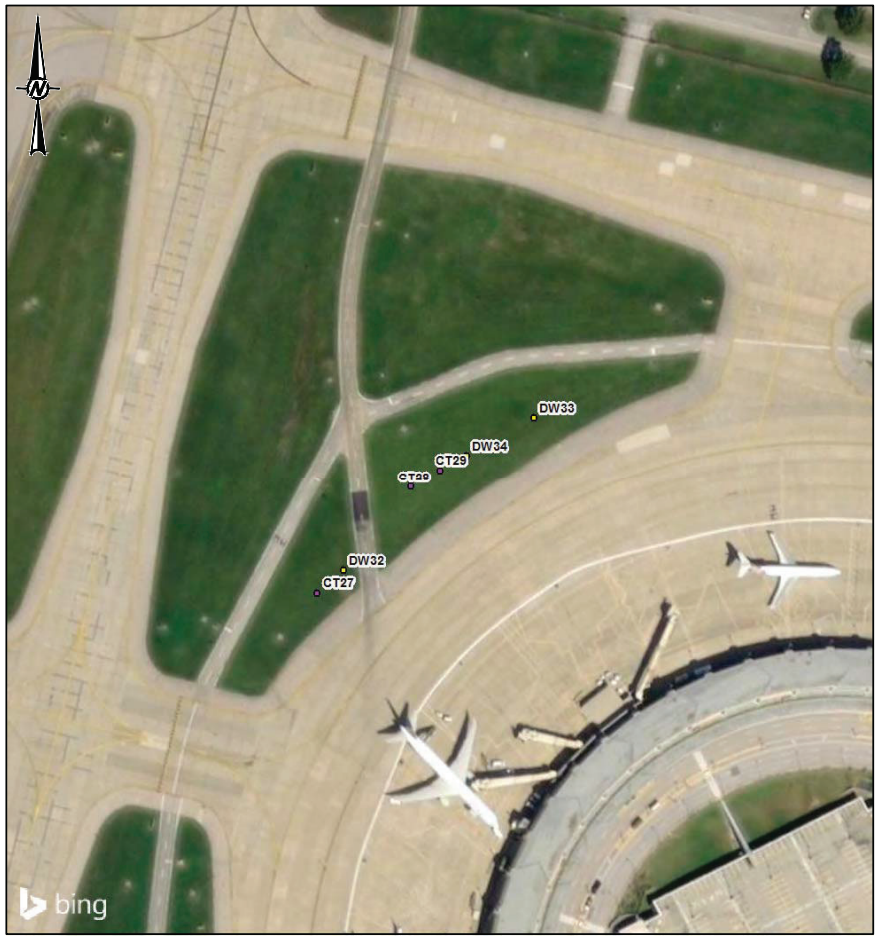

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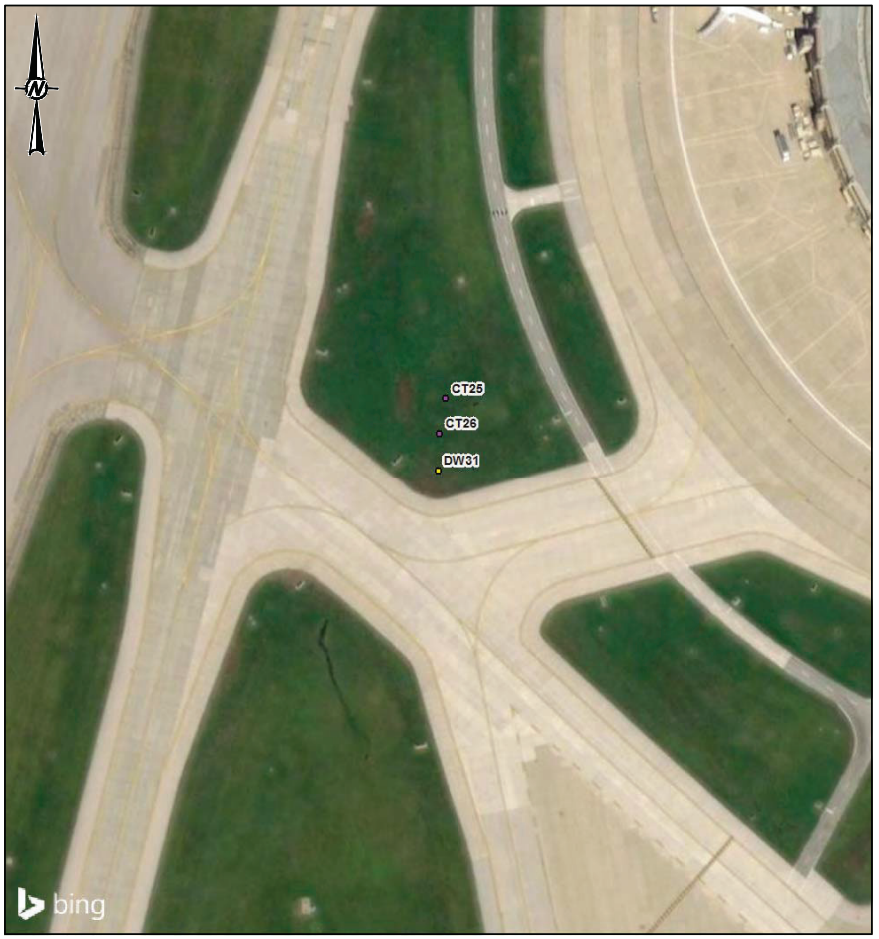

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- Site Limit
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- Shovel Test-David

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Feet
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NOTE(S)

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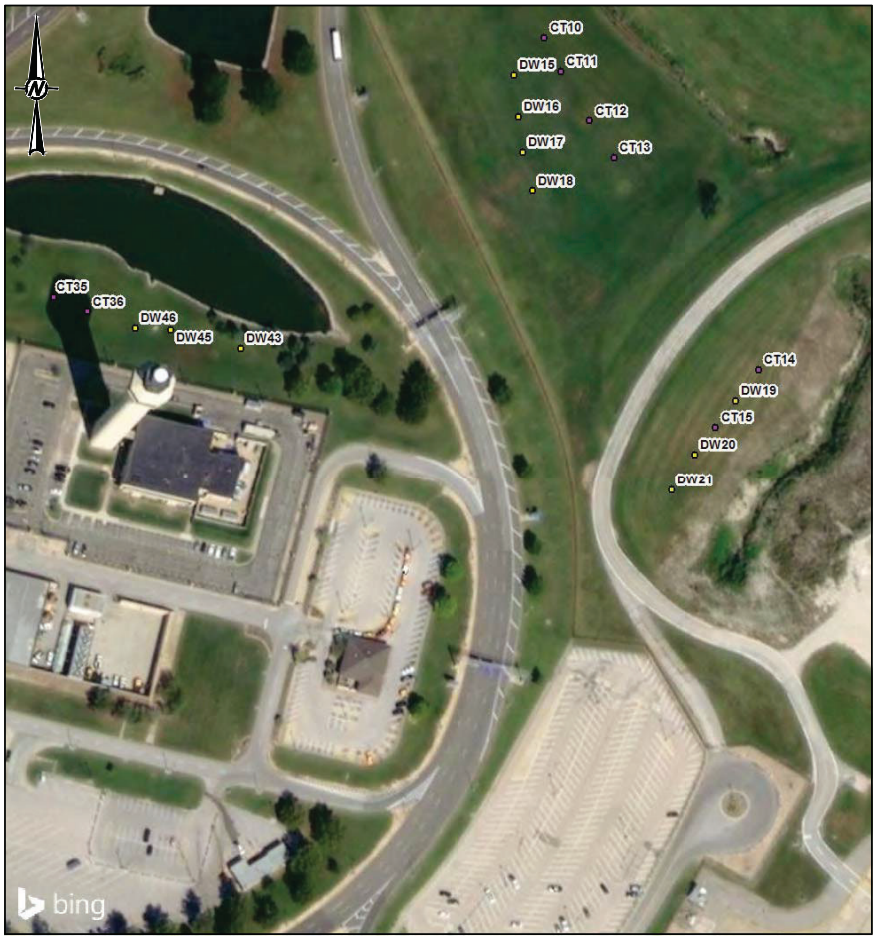

LEGEND

- Site Limit
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- Shovel Test-David

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NOTE(S)

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KC INTERNATIONAL AIRPORT ARCHAEOLOGY

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- Shovel Test-David

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NOTE(S)

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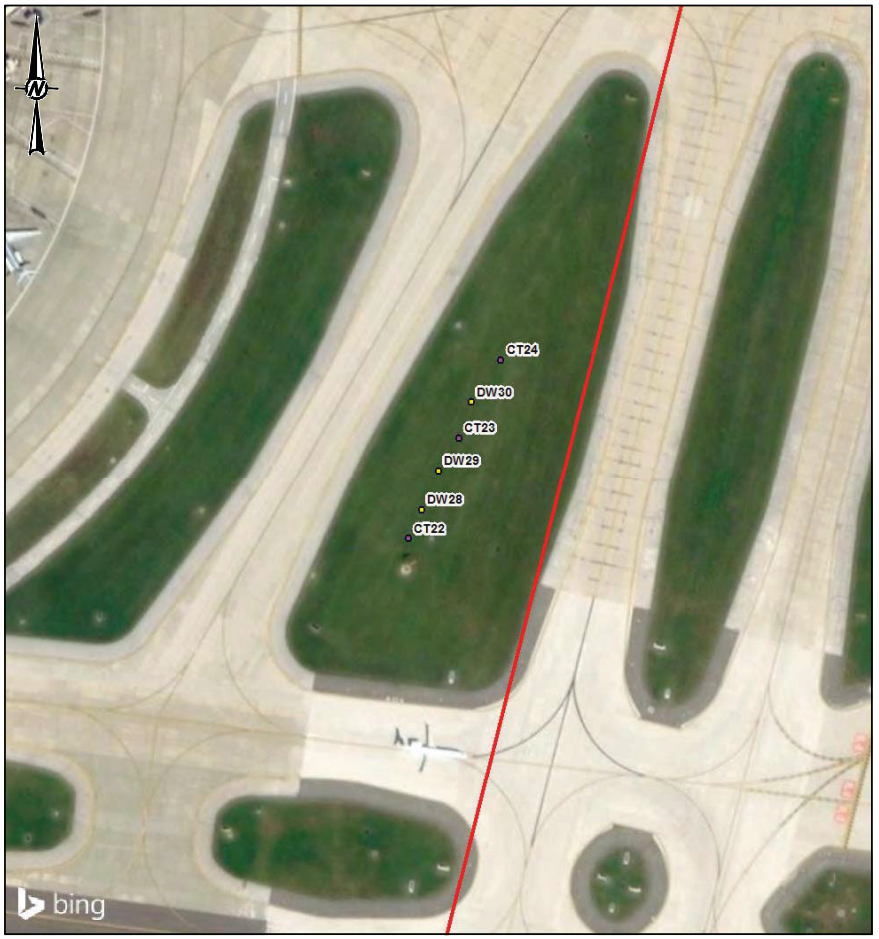

LEGEND

- Site Limit
- Shovel Test-Chris
- Shovel Test-David

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NOTE(S)

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LEGEND

- Trenches
- Site Limit

0 500 1,000
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NOTE(S)

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Project Photographs

Project Title: An Archaeological Survey of the Kansas City International Airport Archaeological Services, Platte County, Missouri

PHOTO 1 View towards the north between Shovel Test Areas 21 and 22 showing an abandoned buried irrigation system pump box within the Project Area	
PHOTO 2 View to the south within Shovel Test Area 1 showing a concrete pour pile on the surface	

Project Title: An Archaeological Survey of the Kansas City International Airport Archaeological Services, Platte County, Missouri

PHOTO 3

View to the southeast between Shovel Test Area 2 and Trench Area 2 showing a mechanically contoured terrace shelf sloping down into a trenched drainage ditch



PHOTO 4

View to the northwest between Shovel Test Area 2 and Trench Area 2 showing a mechanically contoured terrace shelf sloping down into a trenched drainage ditch with riprap, a culvert drainage, and LP Cookingham Drive in the background



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PHOTO 5

View to the northeast within Shovel Test Area 3 showing crushed imported gravels, used for slope stabilization purposes, on the surface



PHOTO 6

View to the southeast within Shovel Test Area 6 showing a buried utility line, and the manicured landscape associated with the “tarmac islands” around the outer perimeter of Terminal C



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PHOTO 7

View to the northwest within Shovel Test Area 6 showing the KCI control tower, and the manicured landscape associated with the "tarmac islands" around the outer perimeter of Terminal C



PHOTO 8

View to the north within Shovel Test Area 15 and Trench Area 8 showing the contoured and manicured landscape associated with LP Cookingham Drive's meridian expanse



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PHOTO 9

View to the east within Shovel Test Area 12 (dropped from testing areas) showing slope and truncated nature of the landform, and parking facility



PHOTO 10

View to the west within Shovel Test Area 13 (dropped from testing areas) showing slope and truncated nature of the landform, and taxi area parking facility



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PHOTO 11

View to the west towards the Trench Area 6 showing a fence line, construction, an airport facility along Bogota Circle, and a concrete tarmac associated with Terminal A



PHOTO 12

View to the south between Shovel Test Areas 18, 19, and 20 showing the level, mechanically truncated, and manicured landscape associated with this area between Mexico City and Brasilia Avenues which used to contain a gravel packed parking facility



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PHOTO 13

View to the south towards the Shovel Test Area 18 from Shovel Test Area 17 showing a deeply incised drainage ditch



PHOTO 14

Example of a typical shovel test (DW22), showing the mottling encountered



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PHOTO 15

Example of a typical shovel test (DW69), showing the imported crushed gravels encountered after the sod cap's removal



PHOTO 16

Example of a backhoe trench (Trench 1), showing the mottled and fill encountered



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PHOTO 17

Example of a backhoe trench (Trench 2), showing the fill material encountered



PHOTO 18

Example of a backhoe trench (Trench 3), showing the backfill material to the side, profiling stakes on the eastern wall and backhoe in the background



Shovel Tests

Data from Representative Shovel Tests

ST	Depth (cmbs)	Soil Color (Munsell)	Sediment Texture	Artifacts Recovered	Comments
DW1	0-5	10YR 3/2	Silty Clay Loam	None	Sod
	5-30	7.5YR 3/2 and 5/3	Silty Clay Loam		Mottled; mechanically crushed gravels encountered
	30-50	7.5YR 3/3	Silty Clay Loam		Mechanically crushed gravels and plastics encountered
	50-61	10YR 5/4	Silty Loam		Compact
DW2	0-3	10YR 3/2	Silty Clay Loam	None	Sod
	3-25	10YR 4/3 and 3/3	Silty Clay		Mottled; mechanically crushed gravels and paper encountered
	25-61	10YR 3/2 and 5/4	Silty Clay		Mottled; mechanically crushed gravels and asphalt encountered
DW3	0-5	10YR 3/2	Silty Clay Loam	None	Sod
	5-27	10YR 4/3 and 3/3	Silty Clay		Mottled; mechanically crushed gravels encountered
	27-60	10YR 3/2 and 5/4	Silty Clay		Mottled; mechanically crushed gravels, copper cable and asphalt encountered
DW4	0-4	10YR 3/2	Silty Clay Loam	None	Sod
	4-12	10YR 4/3 and 3/3	Silty Clay		Mottled; mechanically crushed gravels, cobbles and fill material encountered
DW5	0-5	10YR 3/2	Silty Clay Loam	None	Sod
	5-25	10YR 4/3 and 3/3	Silty Clay		Mottled; mechanically crushed gravels, cobbles and fill material encountered
DW6	0-3	10YR 3/2	Silty Clay Loam	None	Sod
	3-14	10YR 4/3 and 3/3	Silty Clay		Mottled; mechanically crushed gravels, cobbles and fill material encountered
DW7	0-5	10YR 3/2	Silty Clay Loam	None	Sod
	5-25	10YR 4/3 and 3/3	Silty Clay		Mottled; mechanically crushed gravels, cobbles and fill material encountered
DW8	0-5	10YR 3/2	Silty Clay Loam	None	Sod
	5-15	10YR 4/3 and 3/3	Silty Clay		Mottled; mechanically crushed gravels, cobbles and fill material encountered
DW9	0-4	10YR 3/2	Silty Clay Loam	None	Sod
	4-22	10YR 4/3 and 3/3	Silty Clay		Mottled; mechanically crushed gravels, cobbles

ST	Depth (cmbs)	Soil Color (Munsell)	Sediment Texture	Artifacts Recovered	Comments
					and fill material encountered
DW10	0-5	10YR 3/2	Silty Clay Loam	None	Sod
	5-12	10YR 4/3 and 3/3	Silty Clay		Mottled; mechanically crushed gravels, cobbles and fill material encountered
DW11	0-3	10YR 3/2	Silty Clay Loam	None	Sod
	3-10	10YR 4/3 and 3/3	Silty Clay		Cobbles, crushed gravels, and fill material encountered
DW12	0-5	10YR 3/2	Silty Clay Loam	None	Sod
	5-18	10YR 4/3 and 3/3	Silty Clay		Mottled; mechanically crushed gravels and fill material encountered
DW13	0-4	10YR 3/2	Silty Clay Loam	None	Sod
	4-17	10YR 4/3 and 3/3	Silty Clay		Cobbles, crushed gravels, and fill material encountered
DW14	0-5	10YR 3/2	Silty Clay Loam	None	Sod
	5-25	10YR 4/3 and 3/3	Silty Clay		Mottled; mechanically crushed gravels, cobbles and fill material encountered
DW15	0-5	10YR 6/2	Silty Clay Loam	None	Sod
	5-25	10YR 4/4 and 6/4	Silty Clay		Mottled; compact, mechanically crushed gravels, asphalt, a machine made nail, cobbles and fill material encountered
	25-30	10YR 5/6	Clay		Compact; mechanically crushed gravels, cobbles and fill material encountered
DW16	0-2	10YR 6/2	Silty Clay Loam	None	Sod
	2-36	10YR 5/4	Silty Clay		Compact; mechanically crushed gravels, asphalt and fill material encountered, terminated due to large concrete slab
DW17	0-3	10YR 6/2	Silty Clay Loam	None	Sod
	3-19	10YR 5/4	Silty Clay		Compact; mechanically crushed gravels, asphalt and fill material encountered
DW18	0-3	10YR 6/2	Silty Clay Loam	None	Sod
	3-11	10YR 5/4	Silty Clay		Compact; mechanically crushed gravels and fill material encountered
DW19	0-5	10YR 6/2	Silty Clay Loam	None	Sod
	5-7	10YR 7/1	Silty Loam		Imported crushed gravels
DW20	0-7	10YR 6/2	Silty Clay Loam	None	Sod

ST	Depth (cmbs)	Soil Color (Munsell)	Sediment Texture	Artifacts Recovered	Comments
	7-12	10YR 7/1	Silty Loam		Imported crushed gravels
DW21	0-30	10YR 7/2, 7/8, and 6/3	Clay	None	Compact and mottled, gravels intermixed
DW22	0-4	10YR 7/2	Silty Clay Loam	None	Sod
	4-63	10YR 7/3, 7/8, and 6/4	Clay		Compact; mottled
DW23	0-8	10YR 6/2	Silty Clay Loam	None	Sod
	8-43	10YR 7/3, 7/8, and 6/3	Clay		Compact; mottled
DW24	0-22	10YR 7/4, 5/8, and 5/13	Clay	None	Compact; mottled, terminated due to metal dowel connector rod in the unit
DW25	0-3	10YR 6/1	Silty Clay Loam	None	Sod
	3-14	10YR 6/3	Silty Clay		Compact
	14-49	10YR 6/4	Clay		Compact
DW26	0-3	10YR 6/2	Silty Clay Loam	None	Sod
	3-8	10YR 6/4	Silty Clay		Compact
	8-32	10YR 6/6	Clay		Compact
	32-52	10YR 4/4	Clay		Compact
DW27	0-8	10YR 6/2	Silty Clay Loam	None	Sod
	8-11	10YR 7/1	Silty Loam		Imported crushed gravels
DW28	0-3	10YR 6/2	Silty Clay Loam	None	Sod
	3-15	7.5YR 3/1	Clay Loam		Compact
	15-32	7.5YR 6/4	Clay		Compact
	32-42	7.5YR 5/4	Silty Clay		Compact
DW29	0-2	10YR 6/2	Silty Clay Loam	None	Sod
	2-27	10YR 6/6 and 5/6	Silty Clay		Compact; mottled
	27-55	10YR 6/8 and 3/1	Clay		Compact; mottled
	55-61	10YR 7/3	Sand		Unconsolidated sand, packing a buried electrical cable
DW30	0-23	10YR 6/1	Silty Clay Loam	None	Sod
	23-49	10YR 7/4	Silty Clay		Compact
	49-51	10YR 7/2 and 5/6	Clay		Compact; mottled
DW31	0-9	10YR 7/3	Silty Loam	None	Imported crushed gravels
DW32	0-5	10YR 7/2	Silty Clay Loam	None	Sod
	5-36	10YR 8/4 and 6/4	Silty Clay		Compact: asphalt chunk present
	36-45	10YR 5/6 and 3/2	Clay		Compact; mottled, clear plastic was encountered
DW33	0-3	10YR 6/2	Silty Clay Loam	None	Sod
	3-38	10YR 7/6	Silty Clay		Compact: crushed imported gravels present
	38-43	10YR 4/3 and 5/4	Clay		Compact; mottled, a plastic strap was encountered
DW34	0-9	10YR 7/3	Silty Loam	None	Imported crushed gravels
DW35	0-5	10YR 6/3	Silty Clay Loam	None	Sod
	5-51	10YR 7/4 and 6/4	Silty Clay		Compact; mottled, some terracotta fragments and

ST	Depth (cmbs)	Soil Color (Munsell)	Sediment Texture	Artifacts Recovered	Comments
					crushed imported gravels are present
	51-62	10YR 5/4	Clay		Compact
DW36	0-4	10YR 6/2	Silty Clay Loam	None	Sod
	4-58	10YR 6/6 and 4/2	Clay		Compact; mottled, some crushed imported gravels are present
DW37	0-4	10YR 6/1	Silty Clay Loam	None	Sod
	4-37	10YR 7/4 and 6/8	Clay		Compact; mottled
DW38	0-3	10YR 6/3	Silty Clay Loam	None	Sod
	3-36	10YR 7/4	Clay		Compact
DW39	0-37	10YR 6/6	Clay	None	Compact
DW40	0-2	10YR 5/1	Silty Clay Loam	None	Sod
	2-33	10YR 7/4	Clay		Compact
DW41	0-51	10YR 6/2	Clay	None	Compact
DW42	0-2	10YR 5/1	Silty Clay Loam	None	Sod
	2-42	10YR 6/4	Clay		Compact
DW43	0-9	10YR 5/2	Silty Clay Loam	None	Sod
	9-11	10YR 7/2	Silty Loam		Imported crushed gravels
DW44	0-22	10YR 6/1	Silty Clay loam	None	Sod
	22	10YR 8/2	Silty Loam		Imported crushed gravels
DW45	0-4	10YR 6/3	Silty Clay Loam	None	Sod
	4-36	10YR 7/4 and 8/3	Clay		Compact; mottled
DW46	0-5	10YR 5/2	Silty Clay Loam	None	Sod
	5-51	10YR 7/6 and 6/4	Clay		Compact; mottled
DW47	0-6	10YR 6/1	Silty Clay loam	None	Sod; terracotta pipe fragment encountered
	6-24	10YR 5/2 and 6/2	Silty Clay		Compact; mottled, terracotta pipe fragment encountered
	24-52	10YR 6/4 and 5/1	Clay		Compact; mottled
DW48	0-16	10YR 6/2	Silty Clay Loam	None	Sod; no O horizon
	16-40	10YR 2/1 and 6/1	Silty Clay		Compact; mottled
	40-55	10YR 6/3 and 7/3	Clay		Compact; mottled
DW49	0-20	10YR 7/1	Silty Clay Loam	None	Sod; no O horizon
	20-23	10YR 4/1	Silty Clay		Compact
	23-55	10YR 6/4 and 5/6	Clay		Compact; mottled
DW50	0-6	10YR 7/1	Silty Clay Loam	None	Sod; no O horizon
	6-38	10YR 5/8 and 6/6	Silty Clay		Compact; mottled
	38-42	10YR 7/2 and 7/4	Clay		Compact; mottled
DW51	0-7	10YR 7/1	Silty Clay Loam	None	Sod; no O horizon
	7-50	10YR 5/6 and 6/6	Silty Clay		Compact; mottled
	50-52	10YR 7/2 and 7/4	Clay		Compact; mottled
DW52	0-5	10YR 7/1	Silty Clay Loam	None	Sod; no O horizon
	5-40	10YR 5/8 and 6/6	Silty Clay		Compact; mottled
	40-49	10YR 7/2 and 7/3	Clay		Compact; mottled
DW53	0-3	10YR 6/2	Silty Clay Loam	None	Sod; no O horizon
	3-47	10YR 5/4 and 7/4	Silty Clay		Compact; mottled
	47-53	10YR 3/1 and 5/3	Clay		Compact; mottled
DW54	0-7	10YR 3/1	Silty Clay Loam	None	Sod
	7-28	10YR 7/4 and 7/2	Silty Clay		Stiff and firm; mottled
	28-51	10YR 4/1	Clay		Compact

ST	Depth (cmbs)	Soil Color (Munsell)	Sediment Texture	Artifacts Recovered	Comments
	51-72	10YR 4/6 and 7/8	Clay		Compact; mottled
DW55	0-27	10YR 5/3 and 5/2	Clay	None	Sod; no O horizon, compact, mottled, reverse stratigraphy
	27-46	10YR 4/4 and 7/3	Silty Clay		Compact; mottled
	46-66	10YR 5/3 and 5/2	Clay		Compact; mottled
DW56	0-9	10YR 6/1	Silty Clay loam	None	Sod; no O horizon
	9-28	10YR 6/6 and 7/2	Clay		Compact; mottled, reverse stratigraphy
	28-57	10YR 4/4 and 7/3	Silty Clay		Compact; mottled
	57-70	10YR 6/6 and 7/2	Clay		Compact; mottled
DW57	0-4	10YR 6/2	Silty Clay	None	Sod; no O horizon
	4-18	10YR 7/6, 5/2 and 6/4	Clay		Compact; mottled
	18-20	10YR 7/1	Loam		Imported crushed gravels
DW58	0-5	10YR 6/2	Silty Clay	None	Sod; no O horizon
	5-51	10YR 5/6, 3/2 and 6/4	Clay		Compact; mottled, some terracotta fragments encountered
	51-54	10YR 8/1	Silty Loam		Imported crushed gravels
DW59	0-3	10YR 6/2	Silty Clay	None	Sod; no O horizon
	3-23	10YR 6/6 and 5/3	Clay		Compact; mottled
	23-25	10YR 7/1	Silty Loam		Imported crushed gravels
DW60	0-9	10YR 6/1	Silty Clay	None	Sod; no O horizon
	9-24	10YR 6/4 and 5/6	Clay		Compact; mottled, some asphalt fragments encountered
	24-25	10YR 8/1	Loam		Imported crushed gravels
DW61	0-3	10YR 6/3	Silty Clay	None	Sod; no O horizon
	3-44	10YR 6/6 and 5/8	Clay		Compact; mottled
DW62	0-3	10YR 6/3	Silty Clay	None	Sod; no O horizon
	3-39	10YR 6/6	Clay		Compact; some imported crushed gravels present
DW63	0-12	10YR 4/1, 5/1 and 7/4	Silty Clay	None	Sod; no O horizon, mottled
	12-13	10YR 7/1	Loam		Imported crushed gravels
DW64	0-11	10YR 6/2, 2/2 and 4/1	Silty Clay	None	Sod; no O horizon, mottled
	11-13	10YR 7/1	Loam		Imported crushed gravels
DW65	0-10	10YR 6/1, 3/3 and 4/3	Silty Clay	None	Sod; no O horizon, mottled
	10-13	10YR 8/2	Loam		Imported crushed gravels
DW66	0-19	10YR 6/1, 3/1 and 5/1	Silty Clay	None	Sod; no O horizon, mottled
	19-22	10YR 8/1	Loam		Imported crushed gravels
DW67	0-5	10YR 6/2	Silty Clay Loam	None	Sod
	5-15	10YR 5/2	Silty Clay		Compact
	15-18	10YR 7/1	Loam		Imported crushed gravels
DW68	0-4	10YR 6/1	Silty Clay Loam	None	Sod
	4-20	10YR 6/6, 3/1 and 5/4	Silty Clay		Mottled; compact
	20-21	10YR 8/1	Loam		Imported crushed gravels

ST	Depth (cmbs)	Soil Color (Munsell)	Sediment Texture	Artifacts Recovered	Comments
DW69	0-12	10YR 5/3	Silty clay	None	Sod; no O horizon
	12-15	10YR 7/2	Loam		Imported crushed gravels
DW70	0-4	10YR 7/1	Silty Clay Loam	None	Sod
	4-16	10YR 5/4	Silty Clay		Compact
	16-17	10YR 7/2	Loam		Imported crushed gravels
DW71	0-2	10YR 7/2	Silty Clay Loam	None	Sod
	2-7	10YR 4/3	Silty Clay		Compact
	7-9	10YR 7/1	Loam		Imported crushed gravels
DW72	0-3	10YR 7/2	Silty Clay Loam	None	Sod
	3-18	10YR 4/2 and 3/3	Silty Clay		Mottled; stiff and firm; plastic trash encountered
	18-21	10YR 7/1	Loam		Imported crushed gravels
DW73	0-3	10YR 7/3	Silty Clay Loam	None	Sod
	3-16	10YR 3/3 and 6/6	Silty Clay		Mottled; stiff and firm
	16	10YR 7/2	Loam		Imported crushed gravels
DW74	0-12	10YR 5/2	Silty Clay Loam	None	Sod
	12-14	10YR 7/1	Loam		Imported crushed gravels
DW75	0-10	10YR 5/3	Silty Clay Loam	None	Sod
	10-11	10YR 7/1	Loam		Imported crushed gravels
DW76	0-8	10YR 5/3	Silty Clay Loam	None	Sod
	8-10	10YR 7/2	Loam		Imported crushed gravels
DW77	0-14	10YR 7/1	Silty Clay Loam	None	Sod
	14-51	10YR 4/1, 6/1 and 3/1	Silty Clay		Mottled; stiff and firm
	51-54	10YR 7/3 and 8/1	Clay		Mottled; compact
DW78	0-28	10YR 7/1	Silty Clay Loam	None	Sod
	28-45	10YR 4/2 and 5/1	Silty Clay		Mottled; stiff and firm
	45-57	10YR 5/2, 7/3 and 7/1	Clay		Mottled; compact
DW79	0-21	10YR 6/1	Silty Clay Loam	None	Sod
	21-30	10YR 4/2 and 5/3	Silty Clay		Mottled; stiff and firm
	30	10YR 6/6 and 7/1	Clay		Mottled; compact
DW80	0-19	10YR 6/2	Silty Clay Loam	None	Sod
	19-44	10YR 4/3 and 3/1	Silty Clay		Mottled; stiff and firm
	44-48	10YR 6/3 and 5/3	Clay		Mottled; compact
DW81	0-17	10YR 6/2	Silty Clay Loam	None	Sod
	17-31	10YR 4/1, 3/6 and 6/4	Silty Clay		Mottled; stiff and firm
	31	10YR 7/2 and 8/2	Clay		Mottled; compact
DW82	0-20	10YR 6/2	Silty Clay Loam	None	Sod
	20-34	10YR 4/1, 3/6 and 6/4	Silty Clay		Mottled; stiff and firm
	34-38	10YR 7/2 and 8/2	Clay		Mottled; compact
DW83	0-2	10YR 6/1	Silty Clay Loam	None	Sod
	2-27	10YR 4/1, 3/6 and 6/4	Silty Clay		Mottled; stiff and firm
	27-31	10YR 4/3 and 6/2	Clay		Mottled; compact
DW84	0-37	10YR 3/2, 3/4, and 6/2	Silty Clay	None	Mottled; no O horizon, stiff and firm
	37-41	10YR 7/1 and 5/2	Clay		Mottled; compact
CT1	0-25	10YR 4/2 & 5/6	Clay Loam	None	
	25-42	10YR 4/2	Clay Loam		Moist; mottled throughout first 25 cm of shovel test with minor roots
	42-68	2.5Y 5/6	Silt Loam		
CT2	0-23	10YR 4/2 & 5/6	Clay Loam	None	Moist; mottled throughout first 52 cm of shovel test. Mostly fill and asphalt
	23-52	10YR 4/2	Clay Loam		
	52-67	2.5Y 5/6	Silt Loam		
CT3	0-20	10YR 4/2 & 5/6	Clay Loam	None	Moist; mottled clay loam mixed with fill and asphalt that transitions to silt loams
	20-60	2.5Y 5/6	Silt Loam		
	60-63	2.5Y 6/2	Silt Loam		
CT4	0-15	10YR 4/2 & 5/6	Clay Loam	None	Moist; mottled soils with 5% gravel. Mottling appears to be by-product of construction related activities
	15-38	2.5Y 5/6	Silt Loam		
	38-63	2.5Y 5/6 & 2.5Y 6/2	Silt Loam		
CT5	0-8	10YR 4/2	Silty Clay Loam	None	Terminated due to crushed gravel and asphalt from fill
CT6	0-35	10YR 4/2	Silty Clay Loam	None	Terminated due to crushed gravel and asphalt from fill
CT7	0-7	10YR 4/2	Silty Clay Loam	None	Terminated due to crushed gravel and asphalt from fill
CT8	0-13	10YR 4/2	Silty Clay Loam	None	Terminated due to crushed gravel and asphalt from fill
CT9	0-14	10YR 4/2	Silty Clay Loam	None	Terminated due to crushed gravel and asphalt from fill
CT10	0-39	10YR 4/2 & 5/8	Clay Loam	None	Heavy mottling and dense crushed gravel
CT11	0-35	10YR 4/2 & 5/8	Clay Loam	None	Terminated due to crushed gravel and asphalt. Old ground wire in shovel test 10-12 cmbs
CT12	0-10	10YR 3/2	Clay Loam	None	Heavy mottling demonstrating mixed fill
CT13	0-25	10YR 3/2	Clay Loam	None	Terminated due to plastic, asphalt, and concrete rubble

ST	Depth (cmbs)	Soil Color (Munsell)	Sediment Texture	Artifacts Recovered	Comments
CT14	0-5	10YR 3/2	Clay Loam	None	Thin clay lens that transitions to dense crushed gravel
CT15	0-5	10YR 4/2 & 5/8	Clay Loam	None	Moist; heavily mottled and terminated due to crushed gravel and concrete rubble at base of shove test
	5-32	10YR 4/2 & 5/8	Clay		
	32-35.5	10 YR 5/8	Clay		
CT16	0-15	10YR 3/2 & 4/4	Clay Loam	None	Moist; mottled throughout shovel test
	15-32	10YR 6/4 & 7.5YR 4/6	Clay		
	32-60	7.5YR 5/1 & 7.5YR 4/6	Clay		
CT17	0-22	10YR 3/3	Clay Loam	None	Moist; transitions to mottled zone
	22-45	10YR 3/3 & 5/3	Clay		
	45-58.5	10YR 5/3	Clay		
CT18	0-51	10YR 4/3 & 6/3	Clay	None	Moist; mottled throughout shovel test
CT19	0-45	10YR 4/3 & 6/3	Clay	None	Moist; mottled throughout shovel test
CT20	0-12	10YR 3/2	Silty Clay Loam	None	Dry; minimal topsoil development; terminated due to crushed gravel
CT21	0-11	10YR 3/2	Silty Clay Loam	None	Dry; minimal topsoil development; terminated due to crushed gravel
CT22	0-20	10YR 3/1	Clay Loam	None	Moist; transitions to a mottled zone 20-35 cmbs
	20-35	10YR 3/1 & 4/2	Clay		
	35-53	10YR 4/2	Clay		
CT23	0-18	10YR 3/1	Clay Loam	None	Moist; transitions to a mottled zone 18-40 cmbs
	18-40	10YR 3/1 & 4/2	Clay Loam		
	40-51	10YR 4/2	Clay		
CT24	0-15	10YR 3/2	Clay Loam	None	Moist; transitions to a mottled zone 15-37 & 55-70 cmbs
	15-37	10YR 3/2 & 4/2	Clay Loam		
	37-55	10YR 5/3	Clay		
	55-70	10 YR 5/3 & 5/4	Clay		

ST	Depth (cmbs)	Soil Color (Munsell)	Sediment Texture	Artifacts Recovered	Comments
CT25	0-15	10YR 3/2	Silty Clay Loam	None	Terminated due to crushed gravel and fill
CT26	0-13	10YR 3/2	Silty Clay Loam	None	Terminated due to crushed gravel and fill
CT27	0-50	10YR 3/2 & 4/2	Clay Loam	None	Compact; heavily mottled with no defined horizons
CT28	0-18	10YR 3/1 & 6/4	Clay Loam	None	Dry and friable; mottled 0-18 cmbs; becomes more compact with depth
	18-39	10YR 6/4	Clay		
CT29	0-5	10YR 3/2	Silty Clay Loam	None	Dry; terminated due to crushed gravel and fill
CT30	0-15	10YR 4/2	Silty Clay Loam	None	Dry and friable; mottled 15-50 cmbs
	15-50	10YR 4/2 & 5/3	Silty Clay Loam		
	50-55	10YR 5/3	Clay Loam		
CT31	0-54	10YR 4/2	Silty Clay Loam	None	Dry and friable; moist clay loam 54-64 cmbs
	54-62	10YR 5/3	Clay Loam		
CT32	0-50	10YR 3/2	Silty Clay Loam	None	Dry and friable
CT33	0-19	10YR 4/2	Silty Clay Loam	None	Dry and friable; mottled 19-45 cmbs
	19-45	10YR 4/2 & 5/3	Silty Clay Loam		
	45-64	10YR 5/3	Clay Loam		
CT34	0-18	10YR 4/2	Silty Clay Loam	None	Dry and friable; mottled 18-43 cmbs
	18-43	10YR 4/2 & 5/3	Silty Clay Loam		
	43-53	10YR 5/3	Clay Loam		
CT35	0-9	10YR 3/2	Clay Loam	None	Moist; mottled 9-40 cmbs; terminated due to large rock and roots
	9-40	10YR 3/2, 4/4, & 6/2	Clay		
CT36	0-16	10YR 3/2	Clay Loam	None	Moist; mottled 16-50 cmbs
	16-50	10YR 3/2, 4/4, & 6/2	Clay		
CT37	0-28	10YR 3/1	Silty Clay Loam	None	Dry and friable; transitions to a moist clay loam
	28-48	10YR 4/3	Clay Loam		
	48-55	10YR 5/4	Clay		
CT38	0-25	10YR 3/1	Silty Clay Loam	None	Dry and friable; transitions to a moist clay loam
	25-49	10YR 4/3	Clay Loam		

ST	Depth (cmbs)	Soil Color (Munsell)	Sediment Texture	Artifacts Recovered	Comments
	50-60	10YR 5/4	Clay Loam		
	60-63	10YR 6/3	Clay		
CT39	0-15	10YR 3/1	Silty Clay Loam	None	Dry and friable; transitions to a moist clay loam
	15-50.5	10YR 6/6	Clay Loam		
CT40	0-54.5	10YR 4/3 & 5/4	Clay	None	No O-horizon; heavily mottled
CT41	0-5	10YR 3/2	Silty Clay Loam	None	Terminated due to crushed gravel and concrete rubble
CT42	0-60	10YR 3/2 & 5/4	Clay Loam	None	No O-horizon; heavily mottled 0-60 cmbs
	60-65	10YR 6/2	Clay		
CT43	0-45	10YR 3/2 & 4/1	Clay Loam	None	No O-horizon; heavily mottled friable clay loam first 45 cmbs; transitions to a moist clay loam
	45-57	10YR 6/2	Clay		
CT44	0-40	10YR3/2 & 6/2	Clay Loam	None	Compact; mottled fill material
CT45	0-72	10YR 3/2 & 6/2	Clay Loam	None	Compact; mottled fill material
CT46	0-15	10YR 3/2	Silty Clay Loam	None	Terminated due to crushed gravel from former parking lot
CT47	0-15	10YR 3/2	Silty Clay Loam	None	Terminated due to crushed gravel from former parking lot
CT48	0-17	10YR 3/2	Silty Clay Loam	None	Terminated due to crushed gravel from former parking lot
CT49	0-16	10YR 3/2	Silty Clay Loam	None	Terminated due to crushed gravel from former parking lot
CT50	0-23	10YR 3/2	Silty Clay Loam	None	Terminated due to crushed gravel from former parking lot
CT51	0-8	10YR 3/2	Silty Clay Loam	None	Terminated due to crushed gravel from former parking lot
CT52	0-45	10YR 3/2 & 5/4	Clay Loam	None	No O-horizon; compact; heavily mottled

ST	Depth (cmbs)	Soil Color (Munsell)	Sediment Texture	Artifacts Recovered	Comments
CT53	0-11	10YR 3/2	Silty Clay Loam	None	Terminated due to compact crushed gravel
CT54	0-12	10YR 3/2	Silty Clay Loam	None	Terminated due to compact crushed gravel
CT55	0-11.5	10YR 3/2	Silty Clay Loam	None	Terminated due to compact crushed gravel
CT56	0-17	10YR 3/2	Silty Clay Loam	None	Terminated due to compact crushed gravel
CT57	0-20	10YR 3/2	Silty Clay Loam	None	Terminated due to compact crushed gravel
CT58	0-22	10YR 3/2	Silty Clay Loam	None	Terminated due to compact crushed gravel
CT59	0-25	10YR 3/2	Silty Clay Loam	None	Terminated due to compact crushed gravel
CT60	0-23	10YR 3/1	Silty Clay Loam	None	Friable silty clay loam that transitions to a compact clay loam
	23-32	10YR 5/3	Clay Loam		
CT61	0-18	10YR 3/1	Silty Clay Loam	None	Friable silty clay loam that transitions to a compact clay loam
	18-56	10YR 5/3	Clay Loam		
CT62	0-23	10YR 3/1	Silty Clay Loam	None	Friable silty clay loam that transitions to a moist clay loam
	23-48	2.5Y 7/1	Clay Loam		
CT63	0-17	10YR 3/1	Silty Clay Loam	None	Friable silty clay loam that transitions to a moist clay loam
	40-57	10YR 5/3	Clay Loam		
	57-60	2.5Y 7/1	Clay		
CT64	0-26	10YR 3/1	Silty Clay Loam	None	Friable silty clay loam that transitions to a moist clay loam; base of shovel test is mottled
	26-56	10YR 5/3	Clay Loam		
	56-59.5	10YR 5/3 & 2.5Y 7/1	Clay		
CT65	0-25	10YR 3/1	Silty Clay Loam	None	Friable silty clay loam that transitions to a mottled moist clay loam

Supplemental Information

Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Eric R. Greitens, Governor
Carol S. Comer, Director

March 12, 2018

Mr. Scott Tener, P.E.
901 Locust
Kansas City, Missouri 64106

Re: **SHPO Project Number: 007-PL-13** – Kansas City International Airport – Cut/Fill Drawings and Structures Map, Platte County, MO

Dear Mr. Tener:

Thank you for submitting information on the above referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.L. 89-665, as amended) and the Advisory Council on Historic Preservation's regulation 36 CFR part 800, which require identification and evaluation of cultural resources.

We have reviewed the information provided concerning the above referenced project. We have determined that there is a moderate to high potential for the presence of archaeological sites in areas where cut/grading has not been established within the direct APE. Depending on the placement and disturbance level of new construction for this project, there is the possibility for buried deposits under fill placed for the current terminals. An archaeological survey, with deep testing as deemed appropriate, should be conducted, dependent upon further review of plans. This survey should be completed prior to the initiation of project-related construction activities. We look forward to continuing consultation regarding the above ground structures that may be affected by this project.

A list of independent archaeological contractors who can perform such services is available through the Missouri Department of Natural Resources at:
https://dnr.mo.gov/shpo/docs/ArchaeologyConsultantList-2017.pdf

Please note that any 36 CFR Part 61 qualified archaeologist may perform an archaeological survey. If you choose a contractor not on the list, please be certain to include his or her curriculum vitae in the report. We would appreciate **one (1) hard copy and one (1) pdf copy** of the archaeological survey report when it is finished so we may complete the review and comment process.

Recycled paper

If you have any questions, please write Heather Gibb at State Historic Preservation Office, P.O. Box 176, Jefferson City, Missouri 65102 or call Ms. Gibb at 573/751-7862. Please be sure to include the SHPO Log Number **(007-PL-18)** on all future correspondence or inquiries relating to this project.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

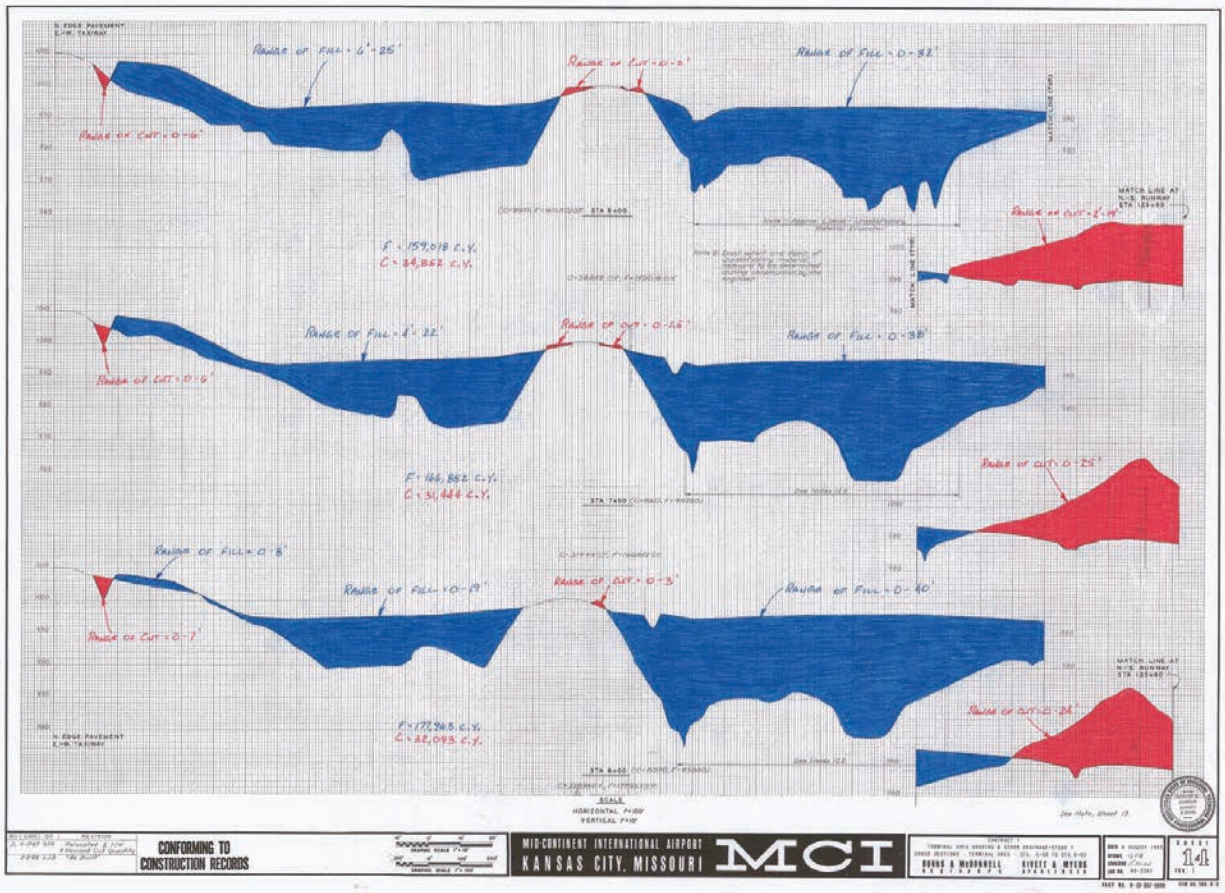
Toni M. Prawl

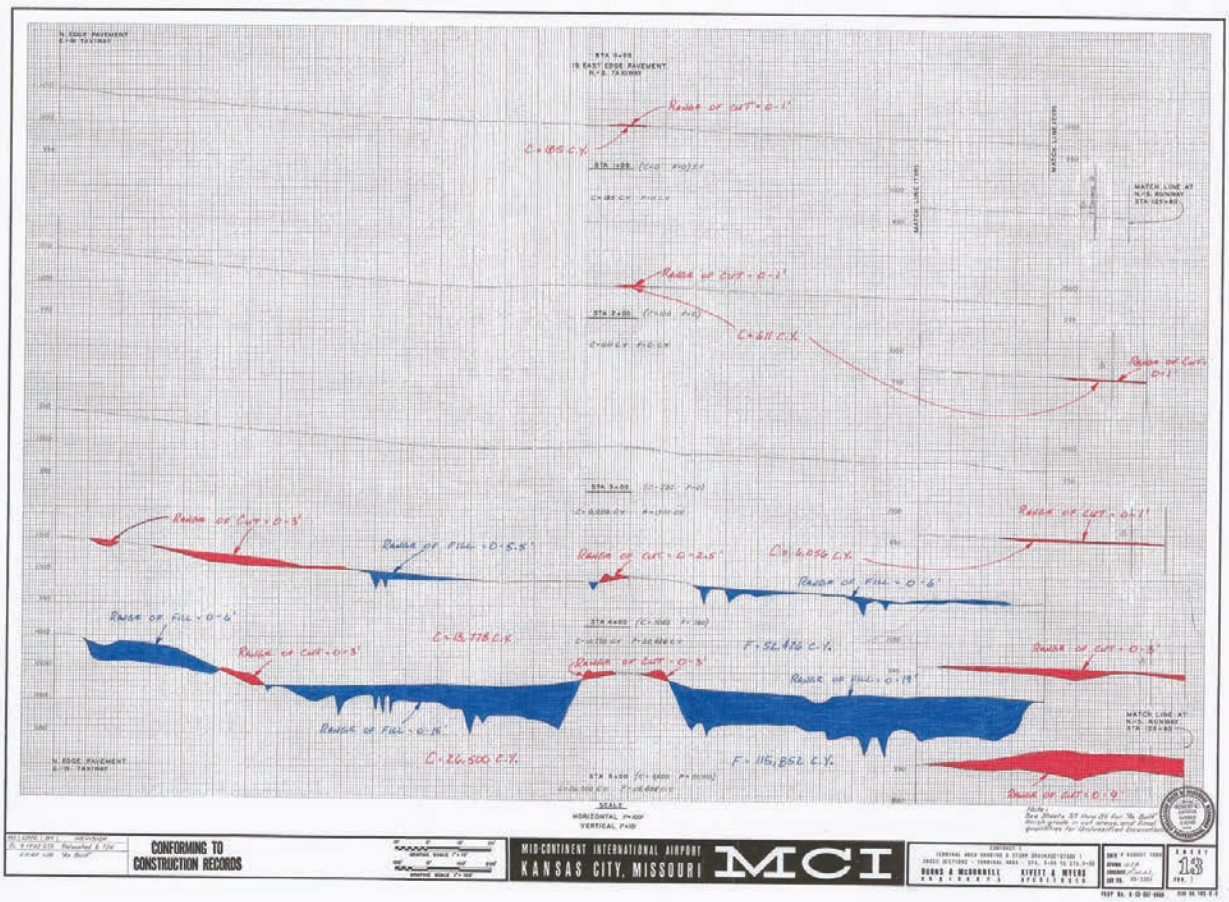
Toni M. Prawl, Ph.D.
Director and Deputy State
Historic Preservation Officer

TMP:hg

c Ms. Amber Tilley, EPA




N. EDGE PAVEMENT E-W TAXIWAY
RANGE OF FILL = 0'-25'
RANGE OF CUT = 0'-2'
RANGE OF FILL = 0'-32'
RANGE OF CUT = 0'-16'
MATCH LINE AT N-S RUNWAY STA 125+65
RANGE OF CUT = 2'-0"
E = 159,018 C.Y.
C = 24,862 C.Y.
RANGE OF FILL = 4'-22'
RANGE OF CUT = 0'-15'
RANGE OF FILL = 0'-38'
RANGE OF CUT = 0'-6'
F = 166,852 C.Y.
C = 31,844 C.Y.
RANGE OF CUT = 0'-25'
RANGE OF FILL = 0'-8'
RANGE OF FILL = 0'-19'
RANGE OF CUT = 0'-3'
RANGE OF FILL = 0'-40'
RANGE OF CUT = 0'-7'
F = 177,943 C.Y.
C = 22,095 C.Y.
RANGE OF CUT = 0'-24'
MATCH LINE AT N-S RUNWAY STA 125+65
N. EDGE PAVEMENT E-W TAXIWAY
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
See Note, Sheet 13.
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
MCI
BURNS & McDONNELL
KIVETT & MYERS
SHEET 14


N. EDGE PAVEMENT E-W TAXIWAY
STA 0+00
15 EAST EDGE PAVEMENT N-S TAXIWAY
RANGE OF CUT = 0'-1'
C = 185 C.Y.
MATCH LINE AT N-S RUNWAY STA 125+65
RANGE OF CUT = 0'-1'
C = 211 C.Y.
RANGE OF CUT = 0'-1'
RANGE OF CUT = 0'-3'
RANGE OF FILL = 0'-5.5'
RANGE OF CUT = 0'-2.5'
C = 4,096 C.Y.
RANGE OF CUT = 0'-1'
RANGE OF FILL = 0'-6'
RANGE OF FILL = 0'-6'
C = 18,778 C.Y.
RANGE OF CUT = 0'-3'
F = 52,426 C.Y.
RANGE OF CUT = 0'-3'
RANGE OF CUT = 0'-5'
RANGE OF FILL = 0'-19'
RANGE OF FILL = 0'-15'
C = 26,500 C.Y.
F = 116,852 C.Y.
RANGE OF CUT = 0'-9'
MATCH LINE AT N-S RUNWAY STA 125+65
N. EDGE PAVEMENT E-W TAXIWAY
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
See Sheets 37 thru 39 for "As Built" design grade or cut areas and final quantities for Unclassified Excavation.
CONFORMING TO CONSTRUCTION RECORDS
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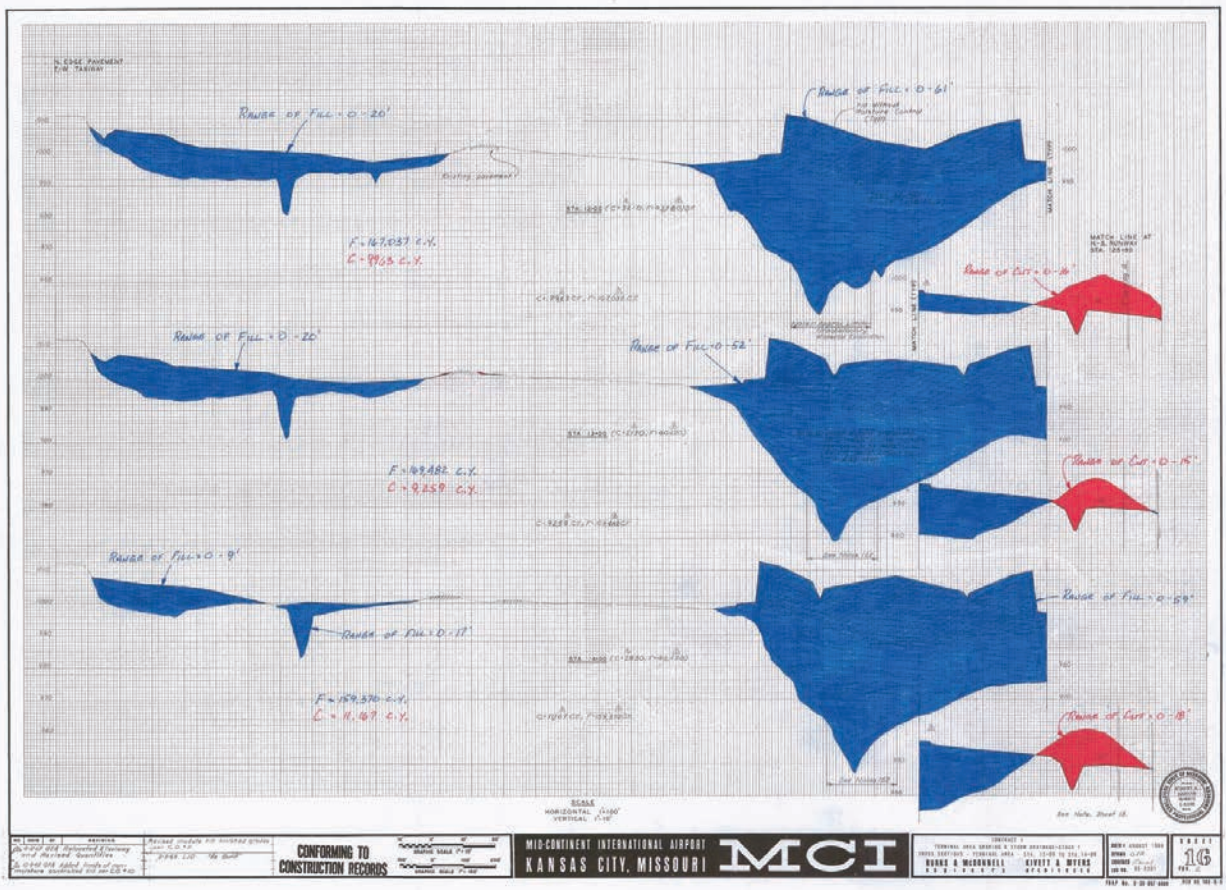
KIVETT & MYERS
SHEET 13


N. EDGE PAVEMENT E-W. TAXIWAY
RANGE OF FILL = 0'-20'
RANGE OF FILL = 0'-61'
F = 147,087 C.Y.
C = 9963 C.Y.
RANGE OF CUT = 0'-16'
RANGE OF FILL = 0'-22'
RANGE OF FILL = 0'-52'
F = 169,882 C.Y.
C = 9259 C.Y.
RANGE OF CUT = 0'-15'
RANGE OF FILL = 0'-9'
RANGE OF FILL = 0'-17'
RANGE OF FILL = 0'-59'
F = 159,570 C.Y.
C = 11,169 C.Y.
RANGE OF CUT = 0'-18'
MATCH LINE AT N.-S. RUNWAY STA. 126+80
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
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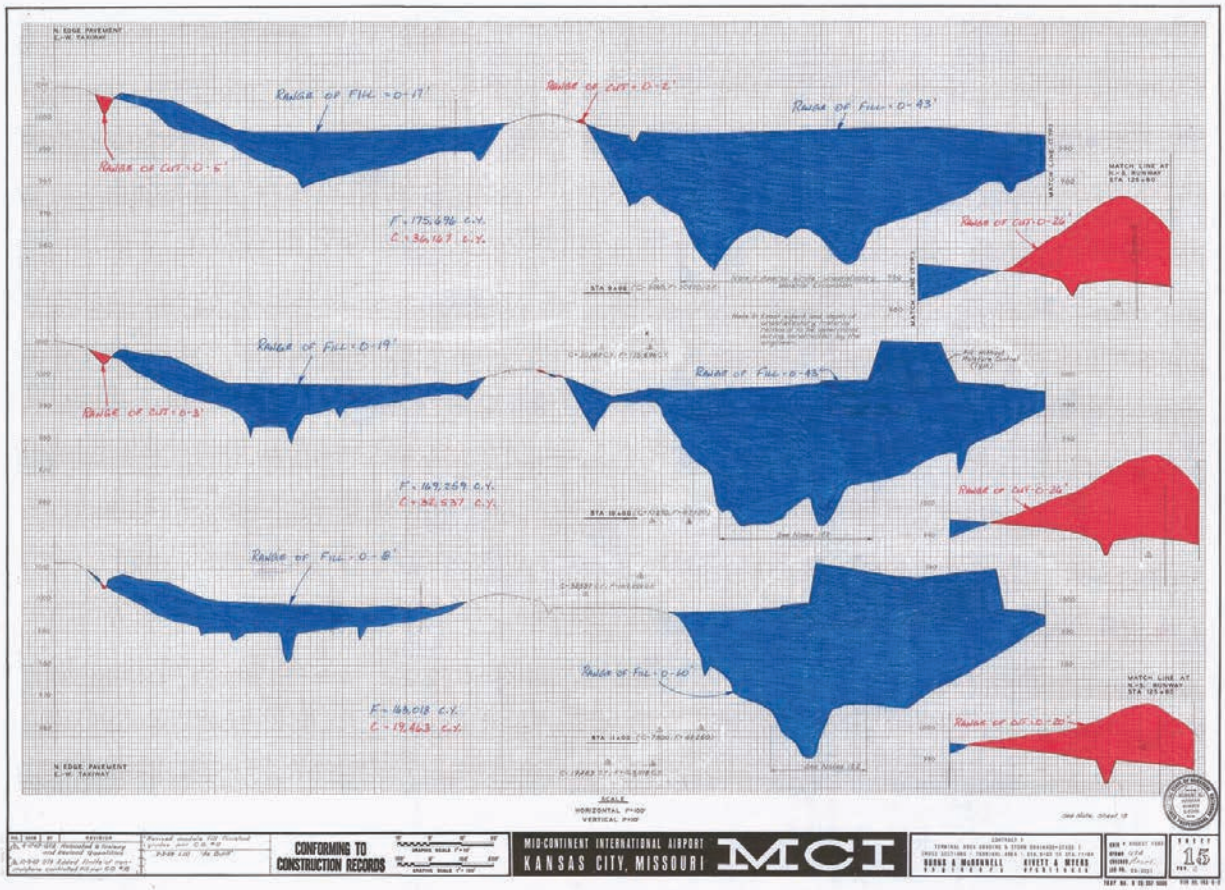
SHEET 16


N. EDGE PAVEMENT E-W. TAXIWAY
RANGE OF FILL = 0'-17'
RANGE OF CUT = 0'-2'
RANGE OF FILL = 0'-43'
RANGE OF CUT = 0'-5'
F = 175,696 C.Y.
C = 36,167 C.Y.
RANGE OF CUT = 0'-26'
RANGE OF FILL = 0'-19'
RANGE OF FILL = 0'-43'
RANGE OF CUT = 0'-3'
F = 169,269 C.Y.
C = 32,537 C.Y.
RANGE OF CUT = 0'-26'
RANGE OF FILL = 0'-8'
RANGE OF FILL = 0'-60'
F = 46,018 C.Y.
C = 19,463 C.Y.
RANGE OF CUT = 0'-20'
MATCH LINE AT N.-S. RUNWAY STA. 126+80
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
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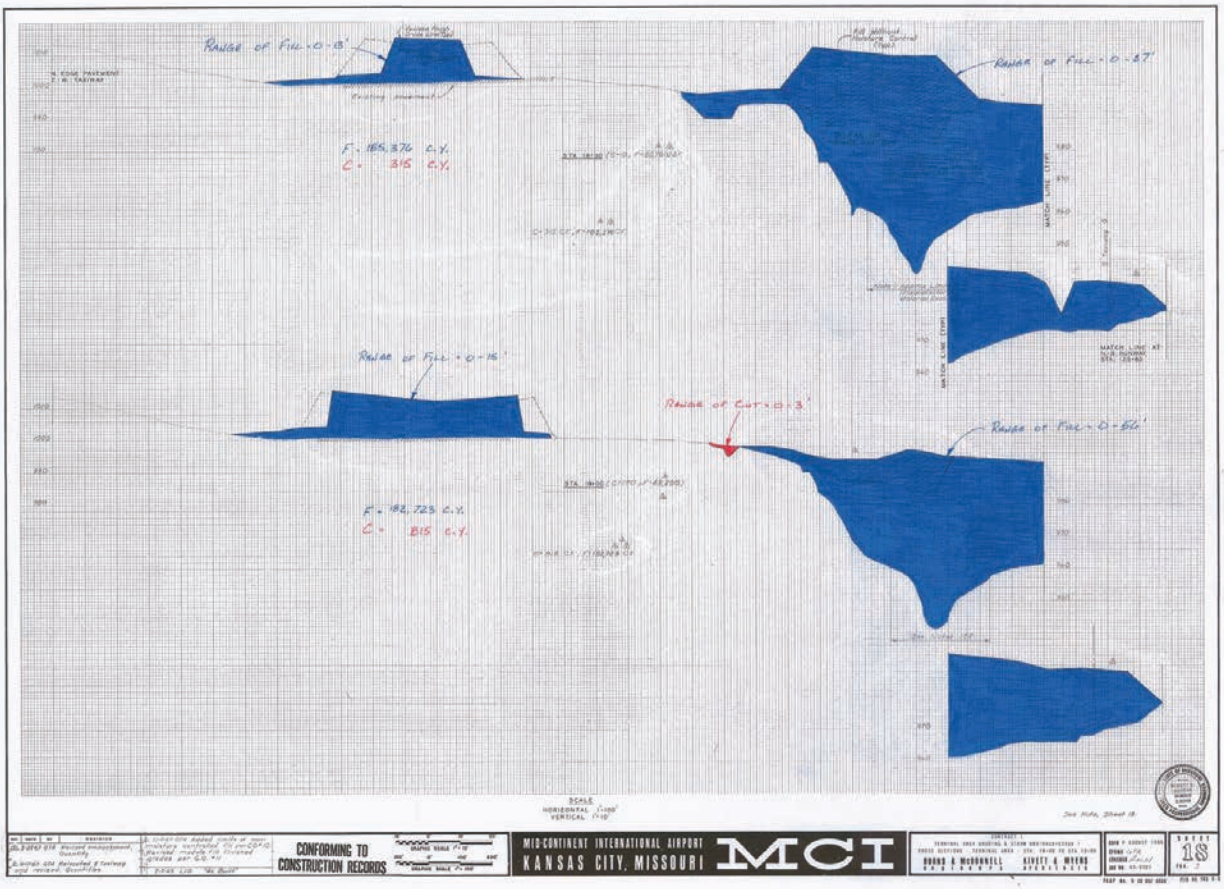
SHEET 15


Range of Fill - 0-13'
Existing pavement
F - 155,376 C.Y.
C - 315 C.Y.
Range of Fill - 0-37'
Range of Fill - 0-15'
F - 182,723 C.Y.
C - 815 C.Y.
Range of Cut - 0-3'
Range of Fill - 0-56'
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
See Note, Sheet 18.
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
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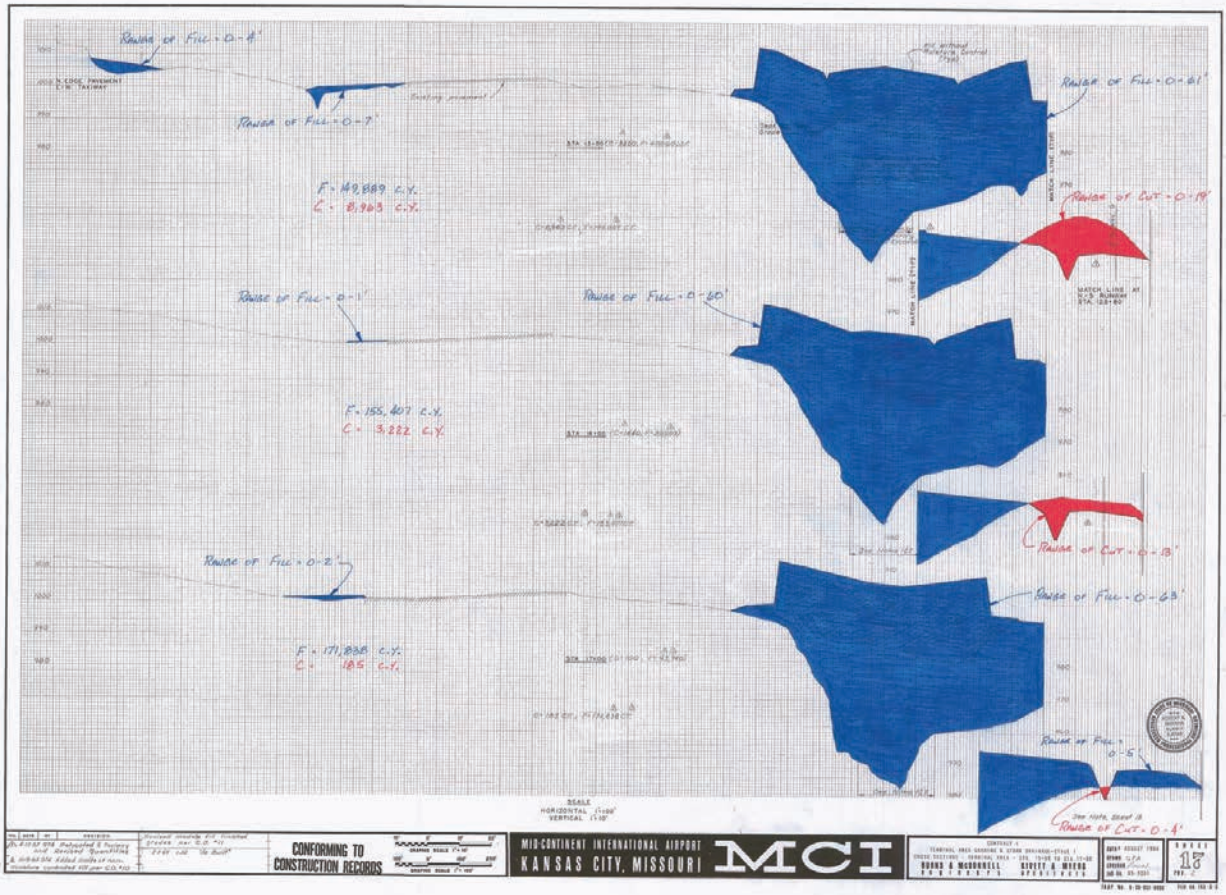
SHEET 18


Range of Fill - 0-4'
Existing pavement
Range of Fill - 0-7'
F - 149,889 C.Y.
C - 8,963 C.Y.
Range of Fill - 0-61'
Range of Cut - 0-19'
Range of Fill - 0-1'
Range of Fill - 0-60'
F - 155,407 C.Y.
C - 3,222 C.Y.
Range of Cut - 0-13'
Range of Fill - 0-2'
Range of Fill - 0-63'
F - 171,838 C.Y.
C - 185 C.Y.
Range of Fill - 0-5'
Range of Cut - 0-4'
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
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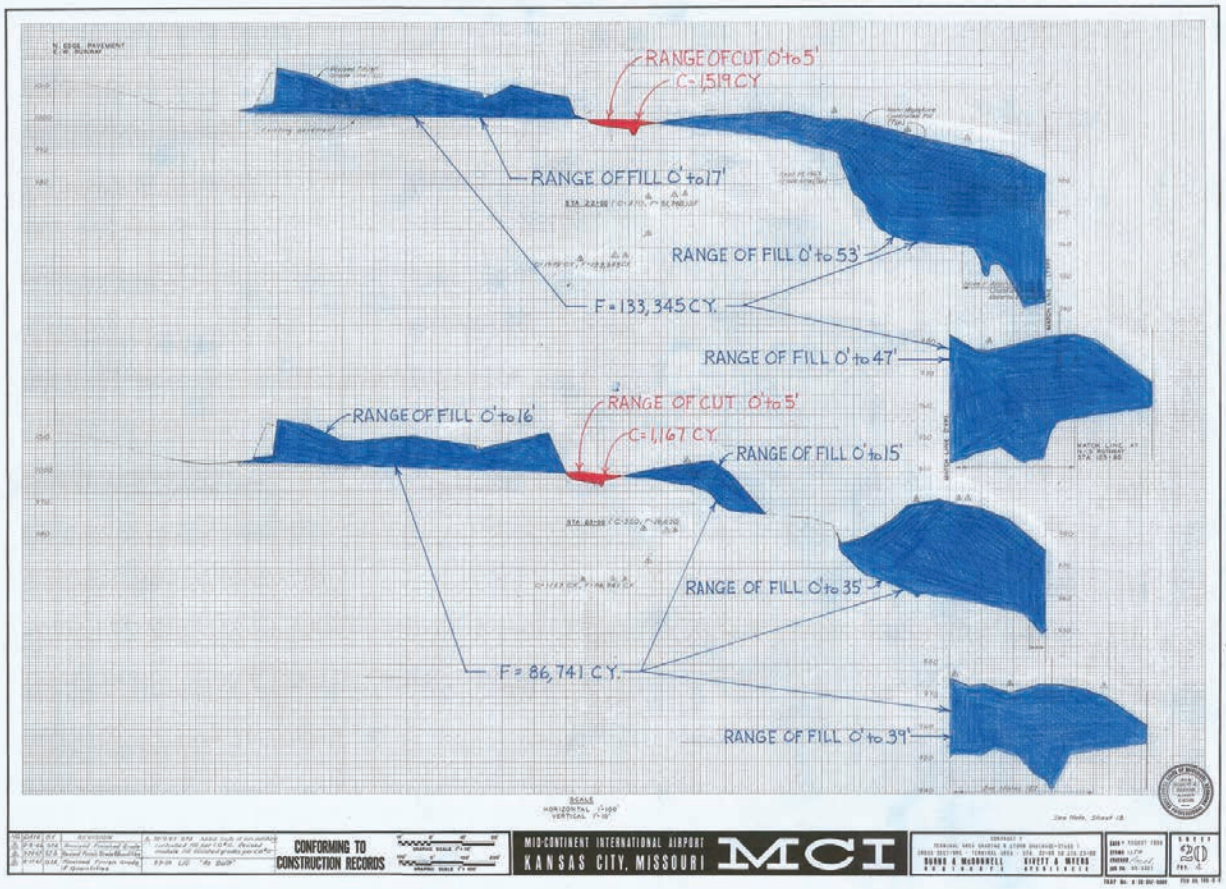
KIVETT & MYERS
SHEET 17


RANGE OF CUT 0'to5'
C=1,519 C.Y.
RANGE OF FILL 0'to17'
RANGE OF FILL 0'to53'
F=133,345 C.Y.
RANGE OF FILL 0'to47'
RANGE OF FILL 0'to16'
RANGE OF CUT 0'to5'
C=1,167 C.Y.
RANGE OF FILL 0'to15'
RANGE OF FILL 0'to35'
F=86,741 C.Y.
RANGE OF FILL 0'to39'
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
CONFORMING TO CONSTRUCTION RECORDS
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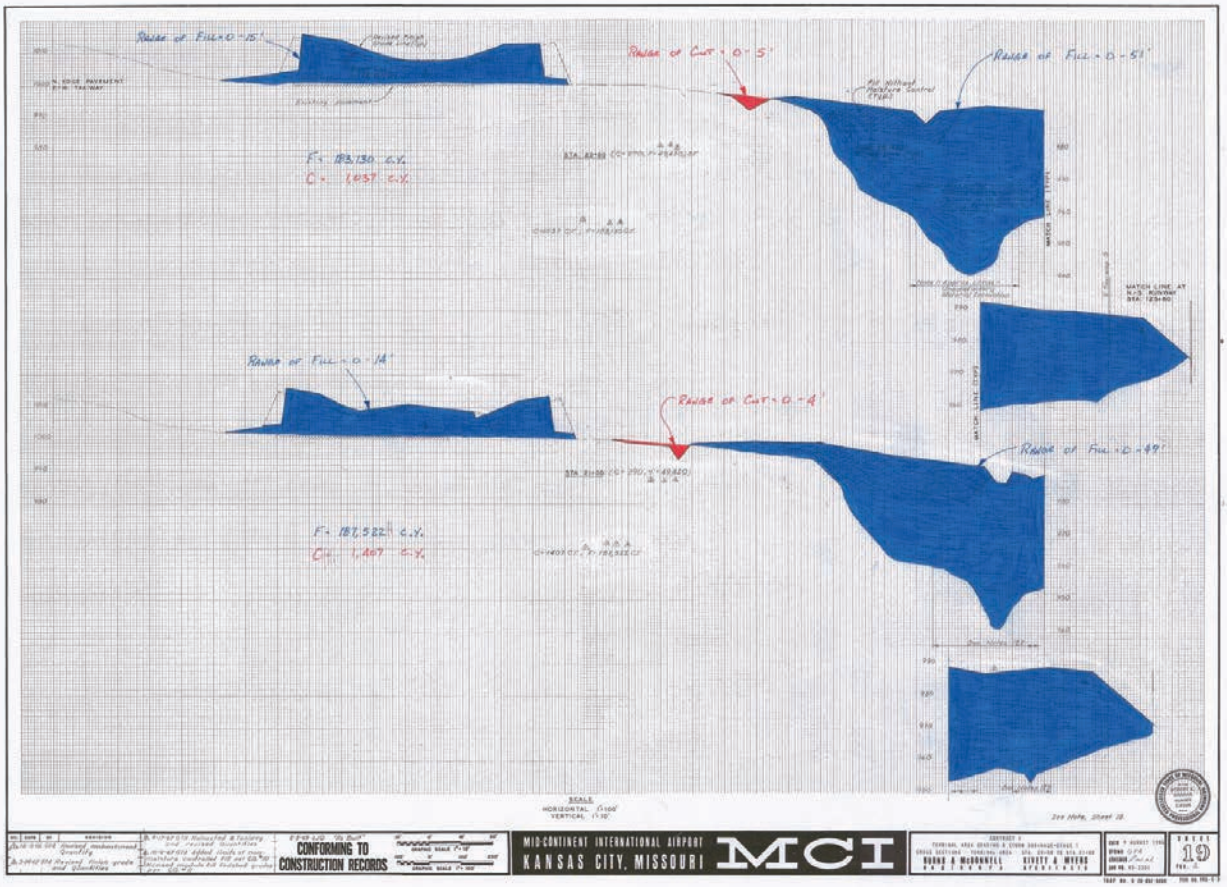
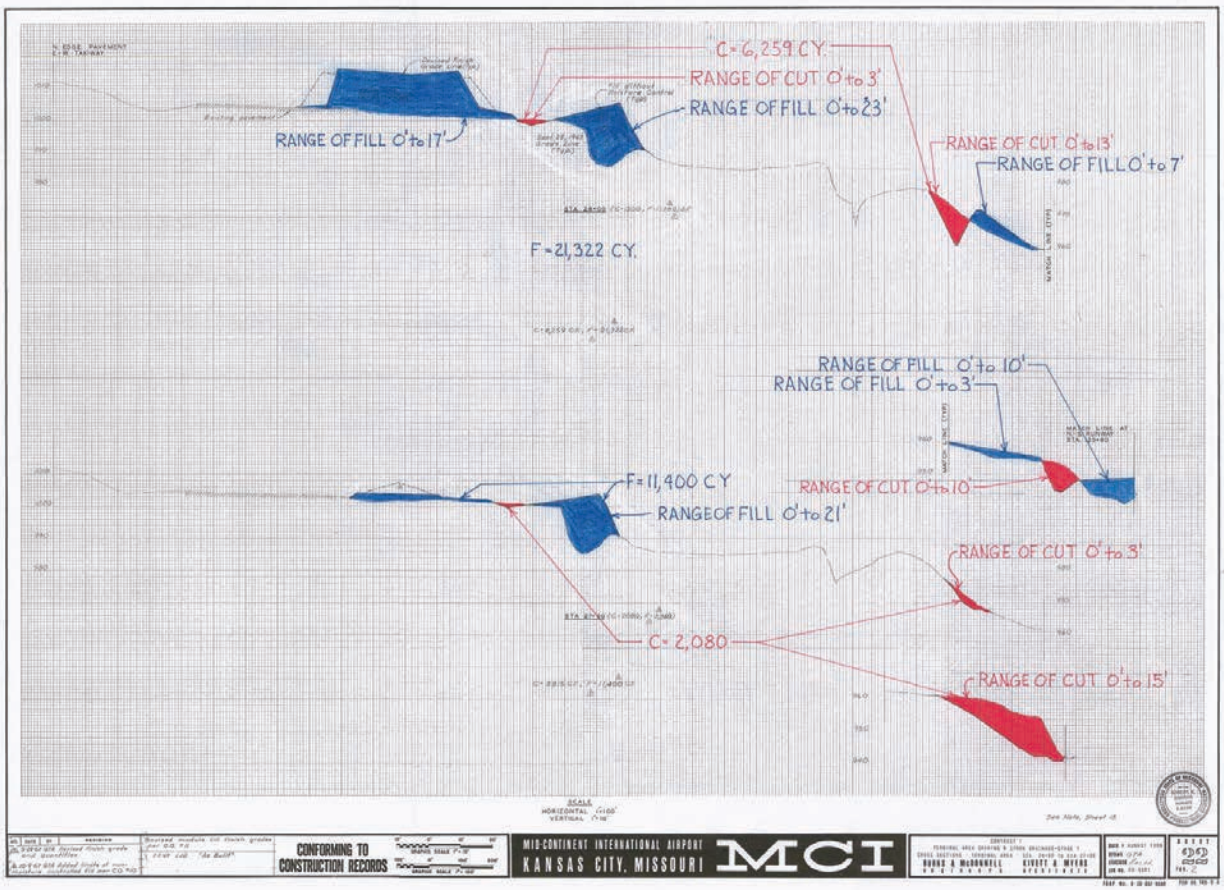
SHEET 20


Range of Fill 0'-15'
Range of Cut 0'-5'
Range of Fill 0'-53'
F= 183,730 C.Y.
C= 1,657 C.Y.
Range of Fill 0'-14'
Range of Cut 0'-4'
Range of Fill 0'-49'
F= 187,522 C.Y.
C= 1,467 C.Y.
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
MCI
SHEET 19


C=6,259 C.Y.
RANGE OF CUT 0' to 3'
RANGE OF FILL 0' to 23'
RANGE OF FILL 0' to 17'
RANGE OF CUT 0' to 13'
RANGE OF FILL 0' to 7'
F=21,322 C.Y.
RANGE OF FILL 0' to 10'
RANGE OF FILL 0' to 3'
F=11,400 C.Y
RANGE OF CUT 0' to 10'
RANGE OF FILL 0' to 21'
RANGE OF CUT 0' to 3'
C=2,080
RANGE OF CUT 0' to 15'
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
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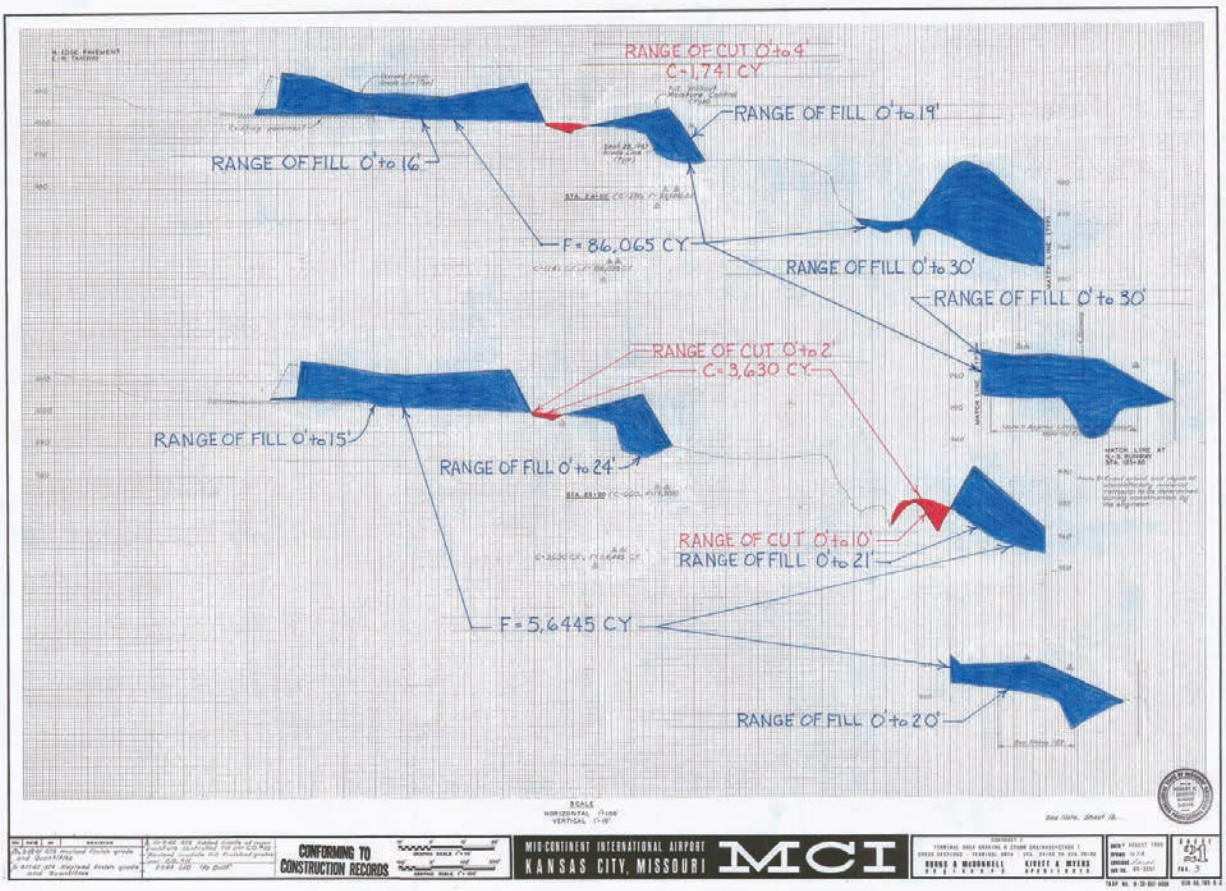
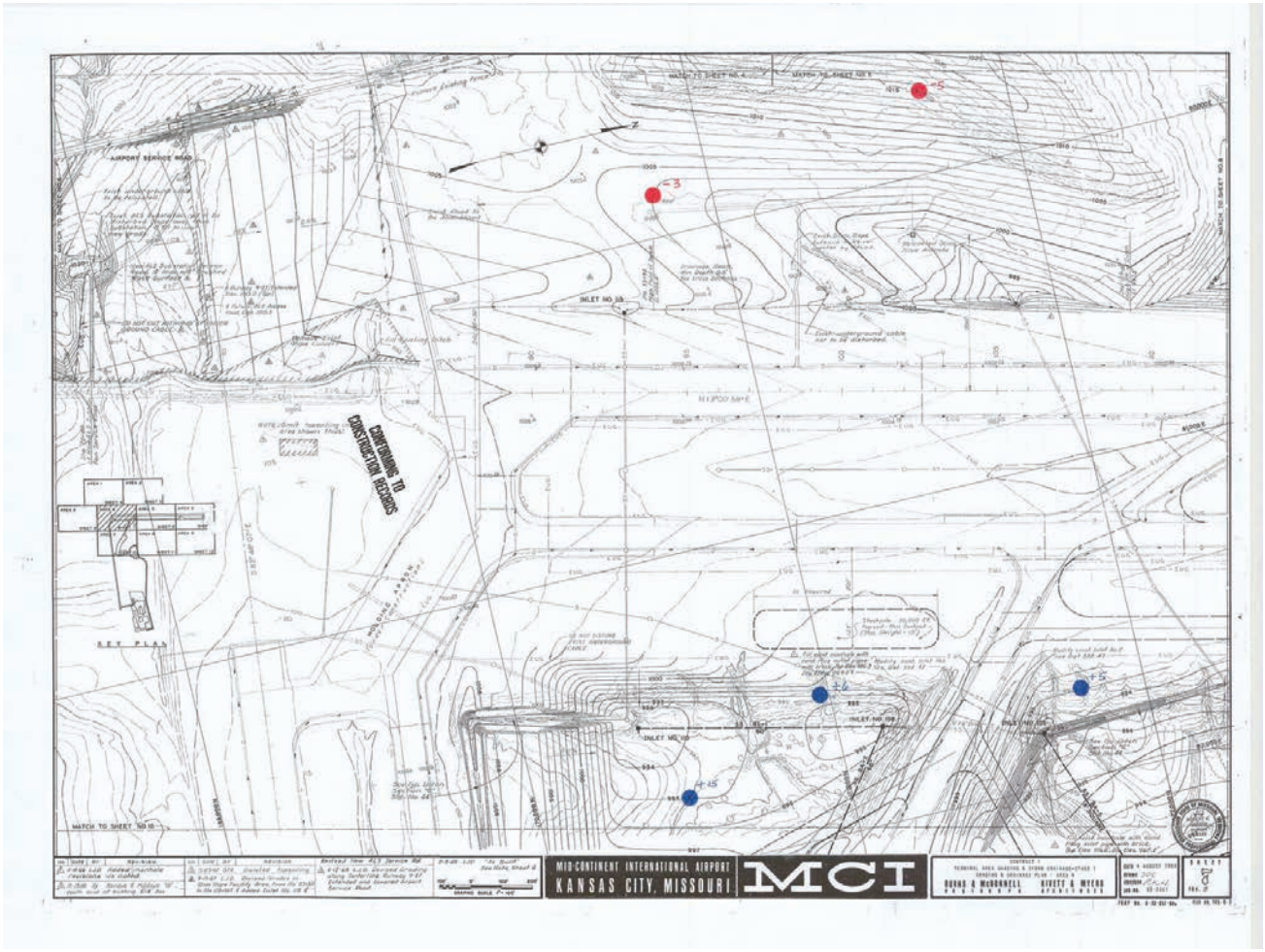

RANGE OF CUT 0' to 4'
C=1,741 C.Y.
RANGE OF FILL 0' to 19'
RANGE OF FILL 0' to 16'
F=86,065 C.Y.
RANGE OF FILL 0' to 30'
RANGE OF FILL 0' to 30'
RANGE OF CUT 0' to 2'
C=3,630 C.Y.
RANGE OF FILL 0' to 15'
RANGE OF FILL 0' to 24'
RANGE OF CUT 0' to 10'
RANGE OF FILL 0' to 21'
F=5,6445 C.Y.
RANGE OF FILL 0' to 20'
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
MCI


CONFORMING TO CONSTRUCTION RECORDS
KEY PLAN
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
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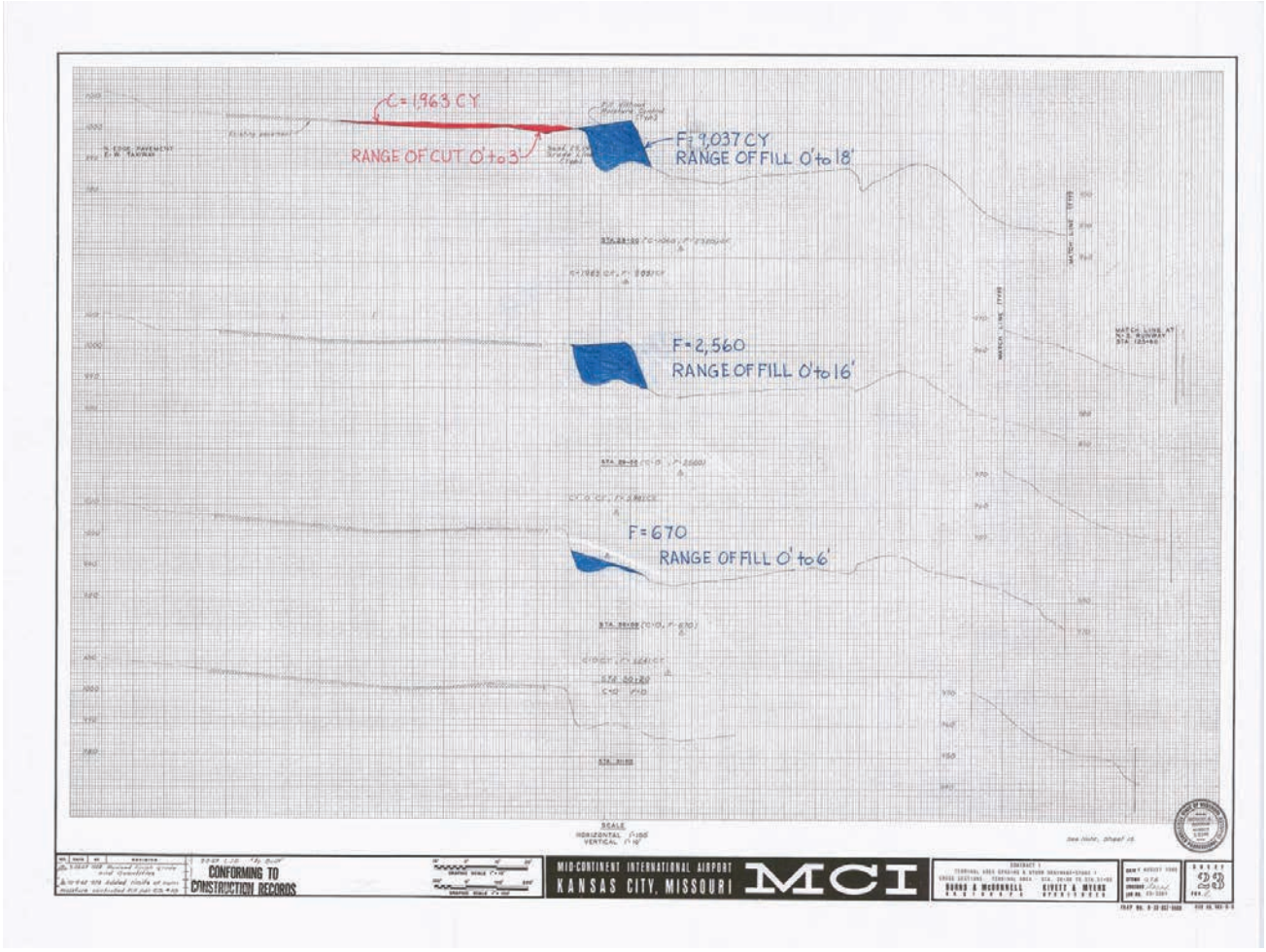
C=1,963 C.Y.
RANGE OF CUT 0'to3'
F=1,037 C.Y.
RANGE OF FILL 0'to 18'
F=2,560
RANGE OF FILL 0'to16'
F=670
RANGE OF FILL 0'to6'
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
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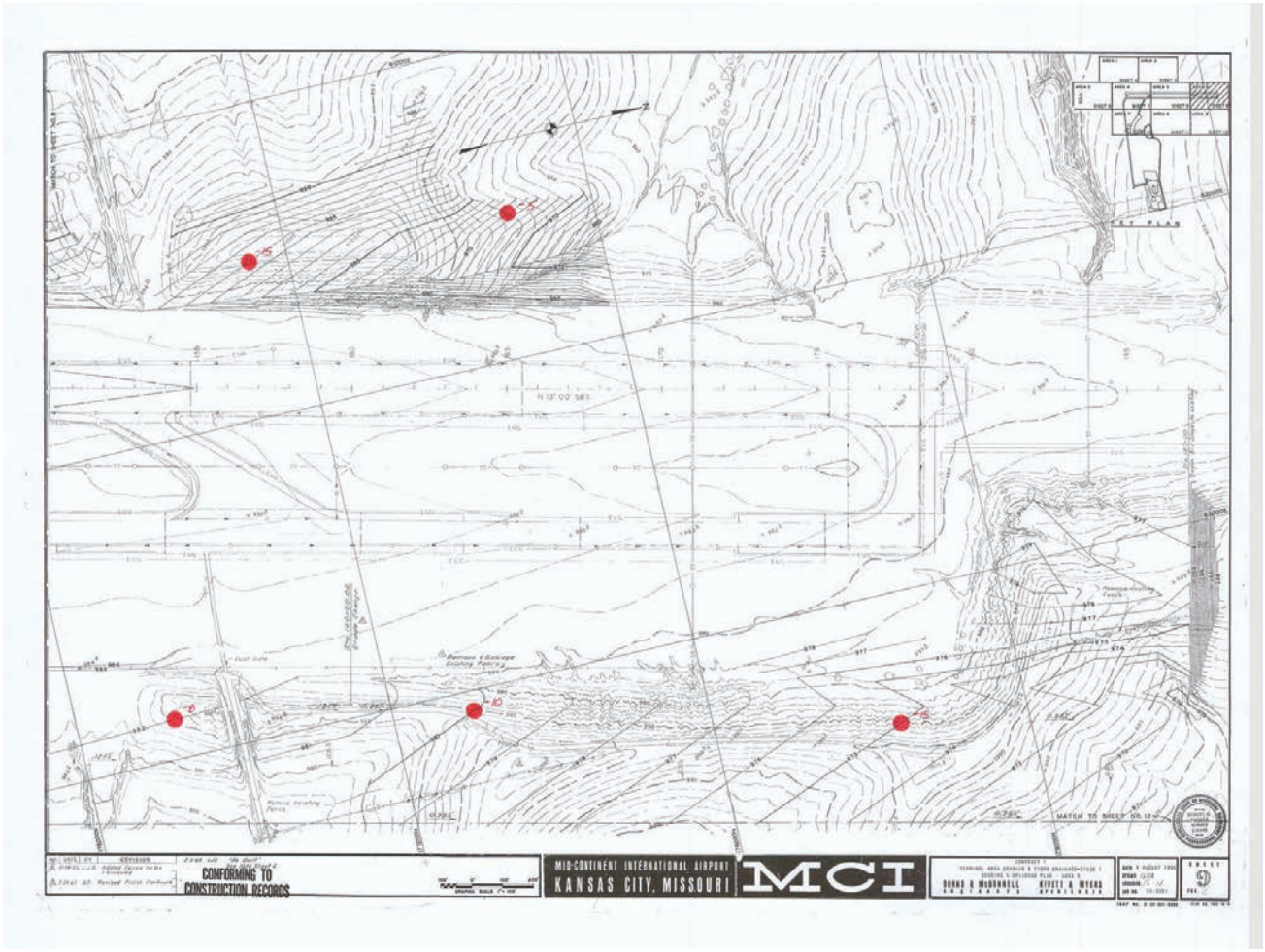
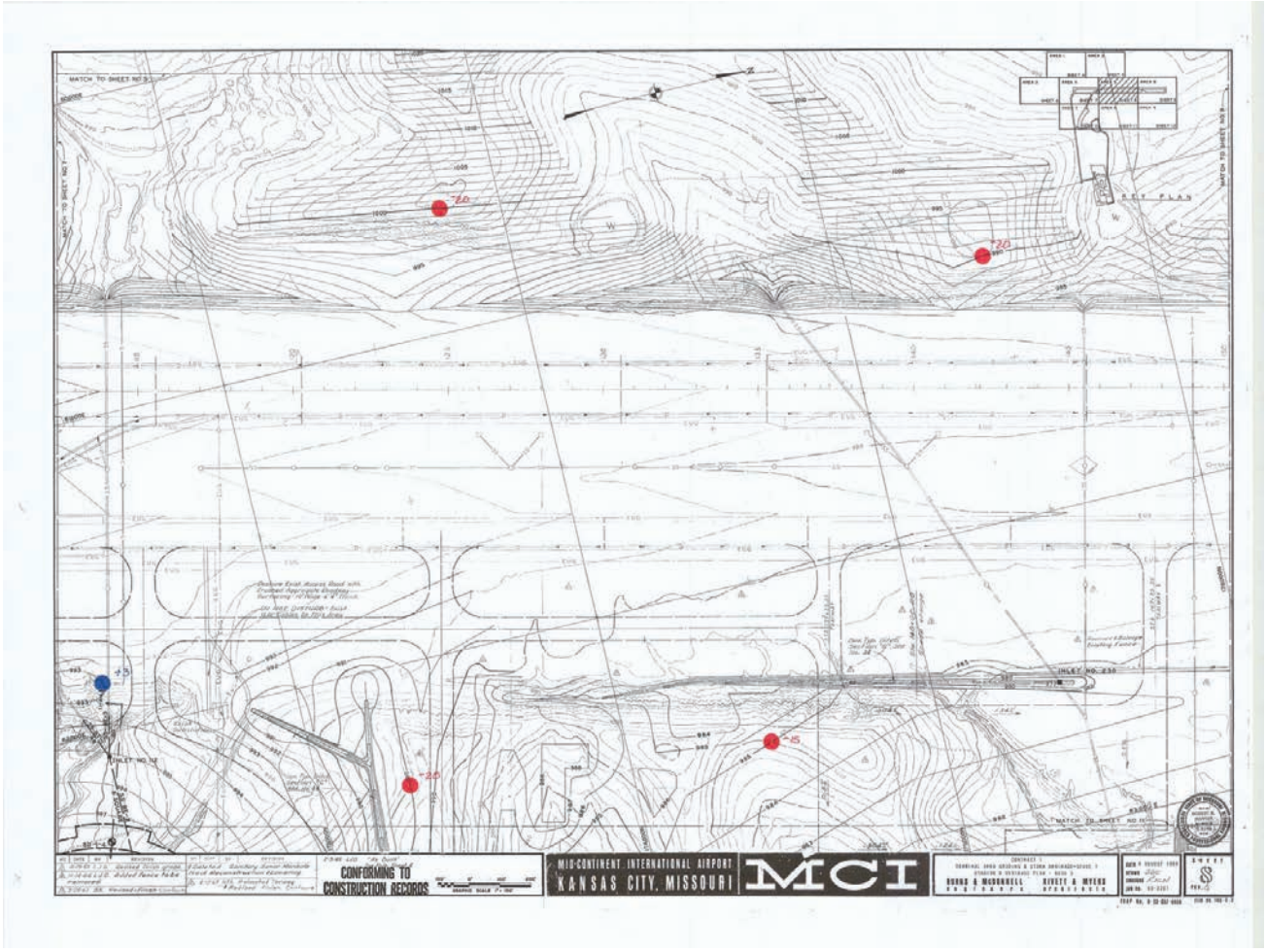

MATCH TO SHEET NO 9
MATCH TO SHEET NO 12
KEY PLAN
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
MCI
BURNS & McDONNELL
KIVETT & MYERS


MATCH TO SHEET NO 7
MATCH TO SHEET NO 9
KEY PLAN
INLET NO. E30
INLET NO. 32
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
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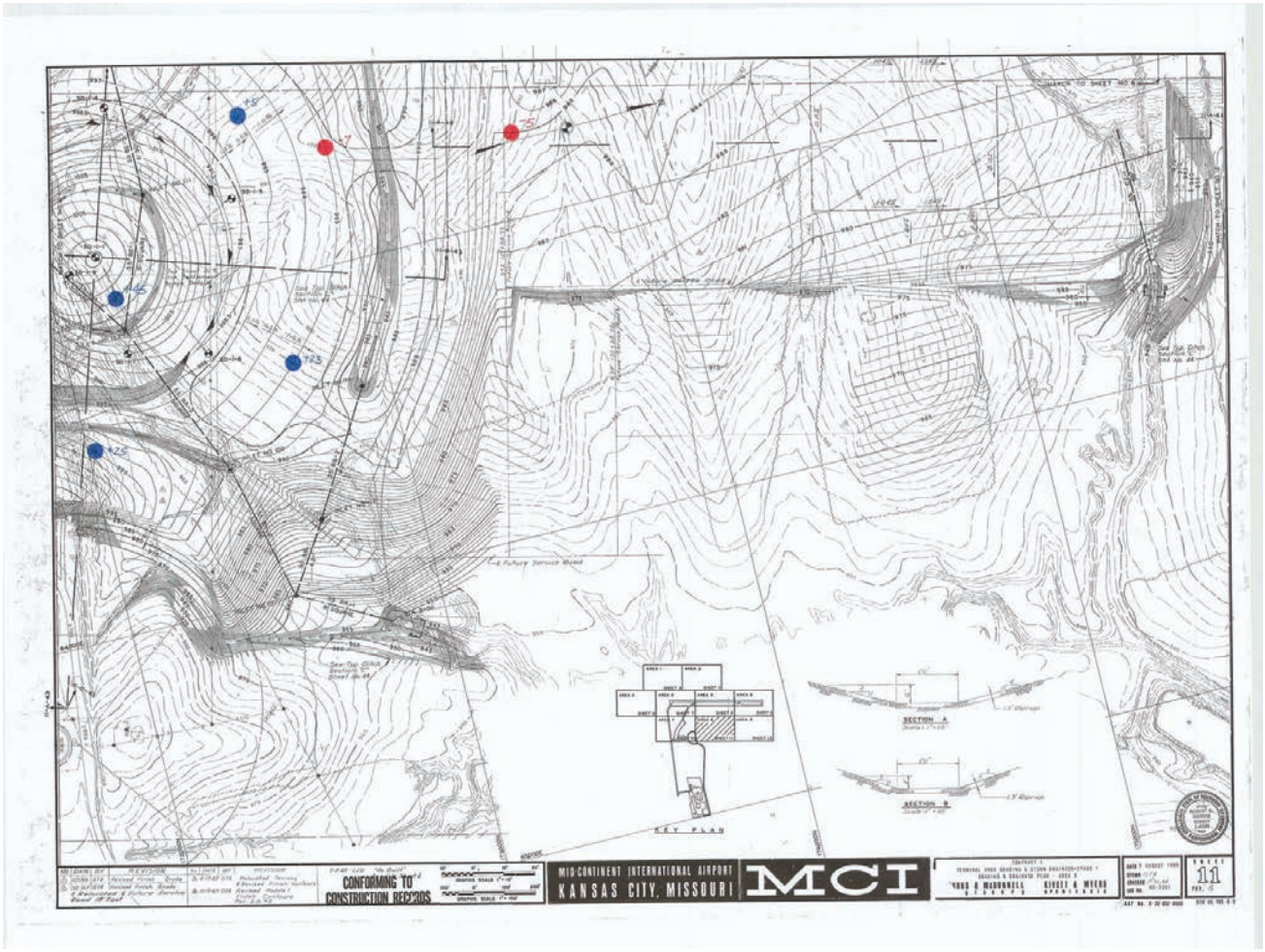
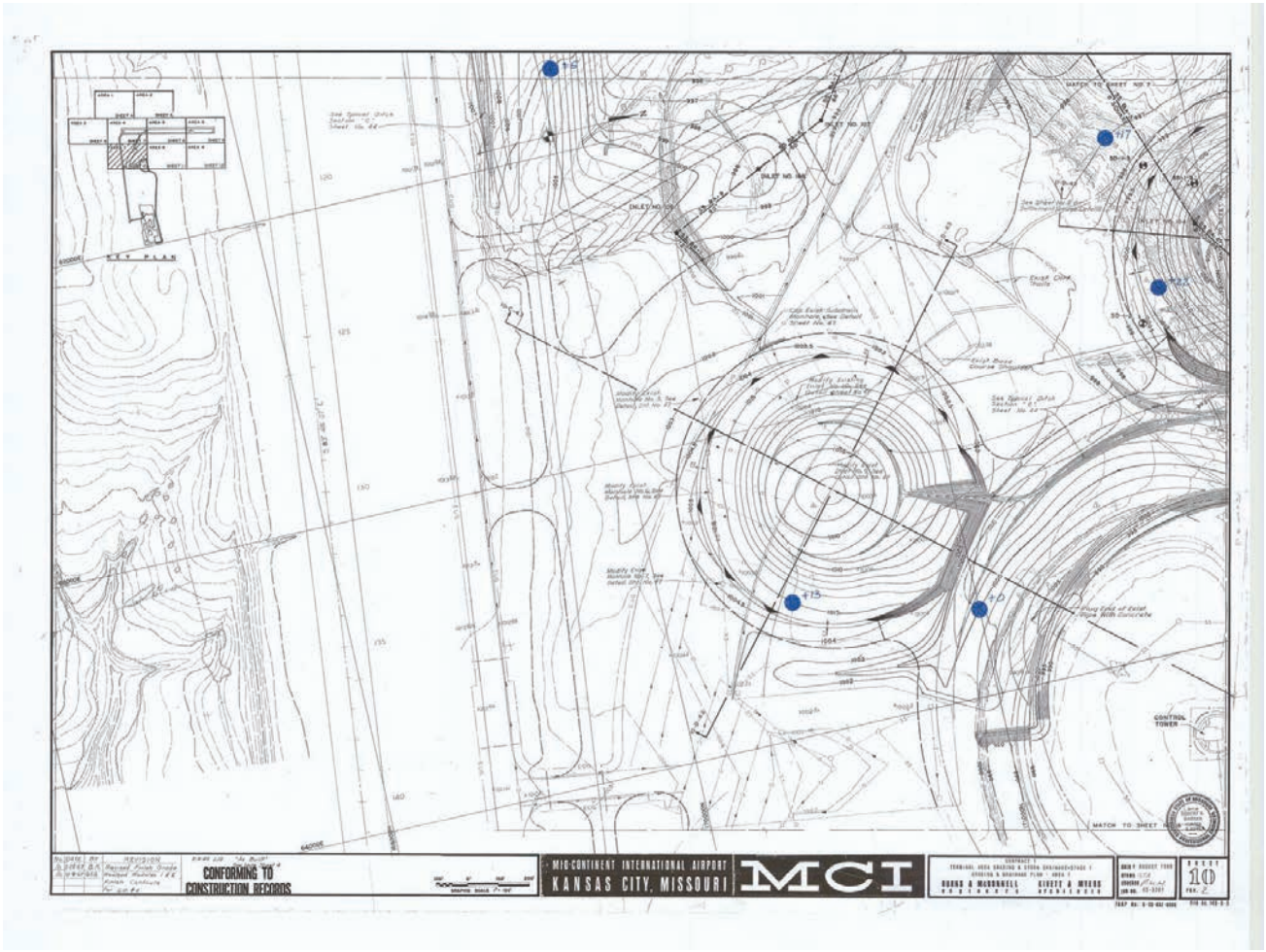

CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
MCI
KEY PLAN
SECTION A
SECTION B
SHEET 11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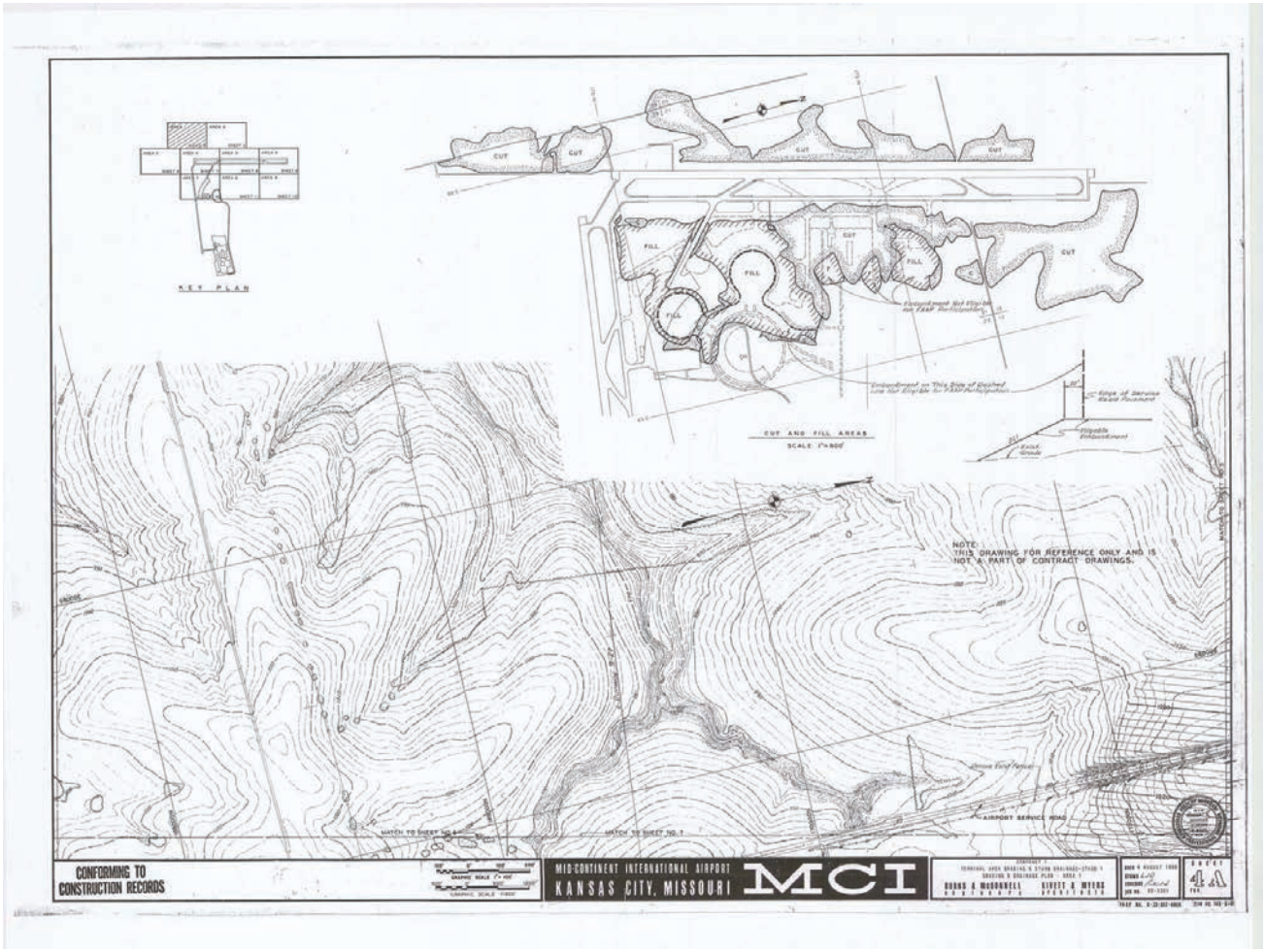
KEY PLAN
CONTROL TOWER
SHEET 10


KEY PLAN
CUT AND FILL AREAS
SCALE 1"=800'
NOTE:
THIS DRAWING FOR REFERENCE ONLY AND IS NOT A PART OF CONTRACT DRAWINGS.
AIRPORT SERVICE ROAD
CONFORMING TO CONSTRUCTION RECORDS
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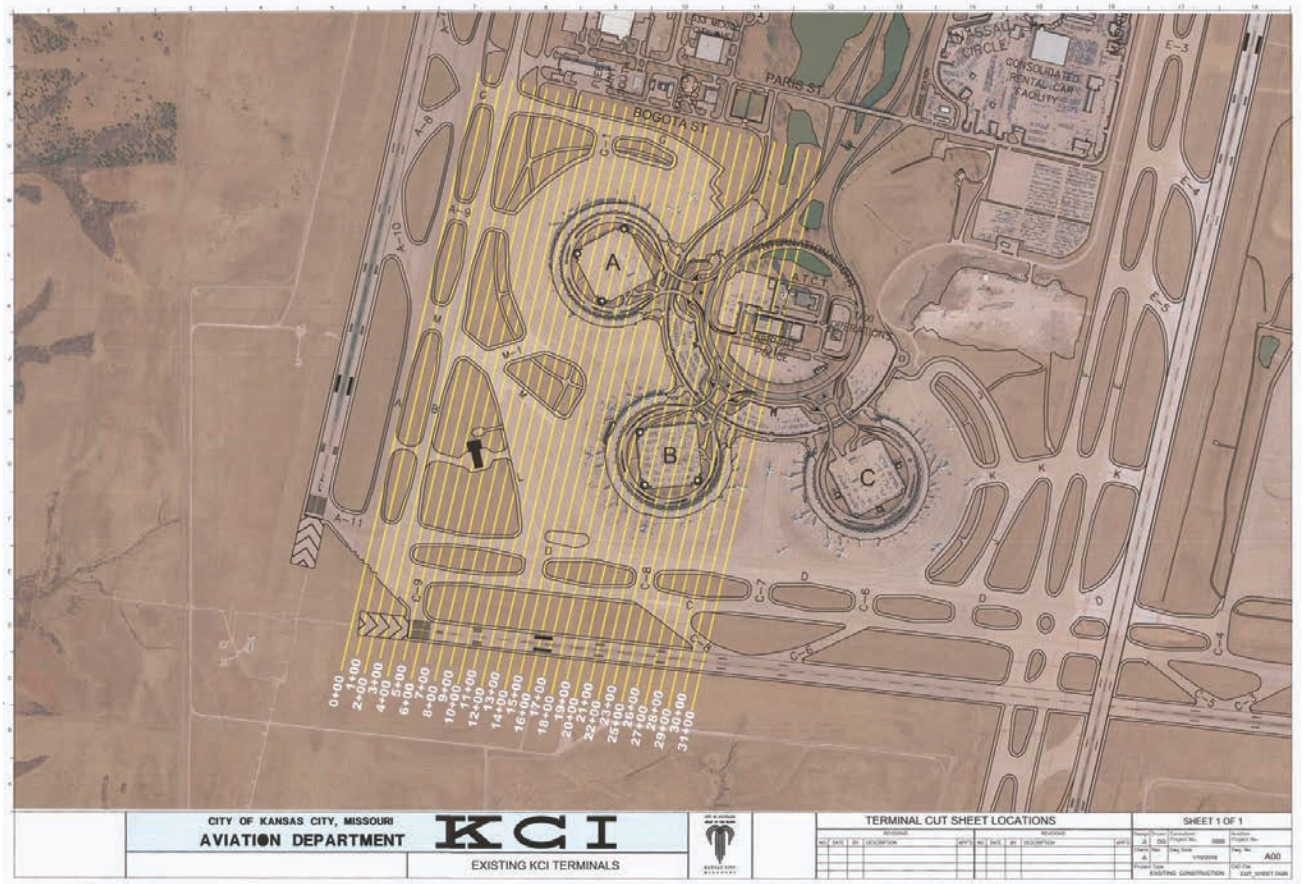
KANSAS CITY, MISSOURI
MCI
BURNS & McDONNELL
KIVETT & MYERS


PARIS ST
BOGOTA ST
CONSOLIDATED RENTAL CAR FACILITY
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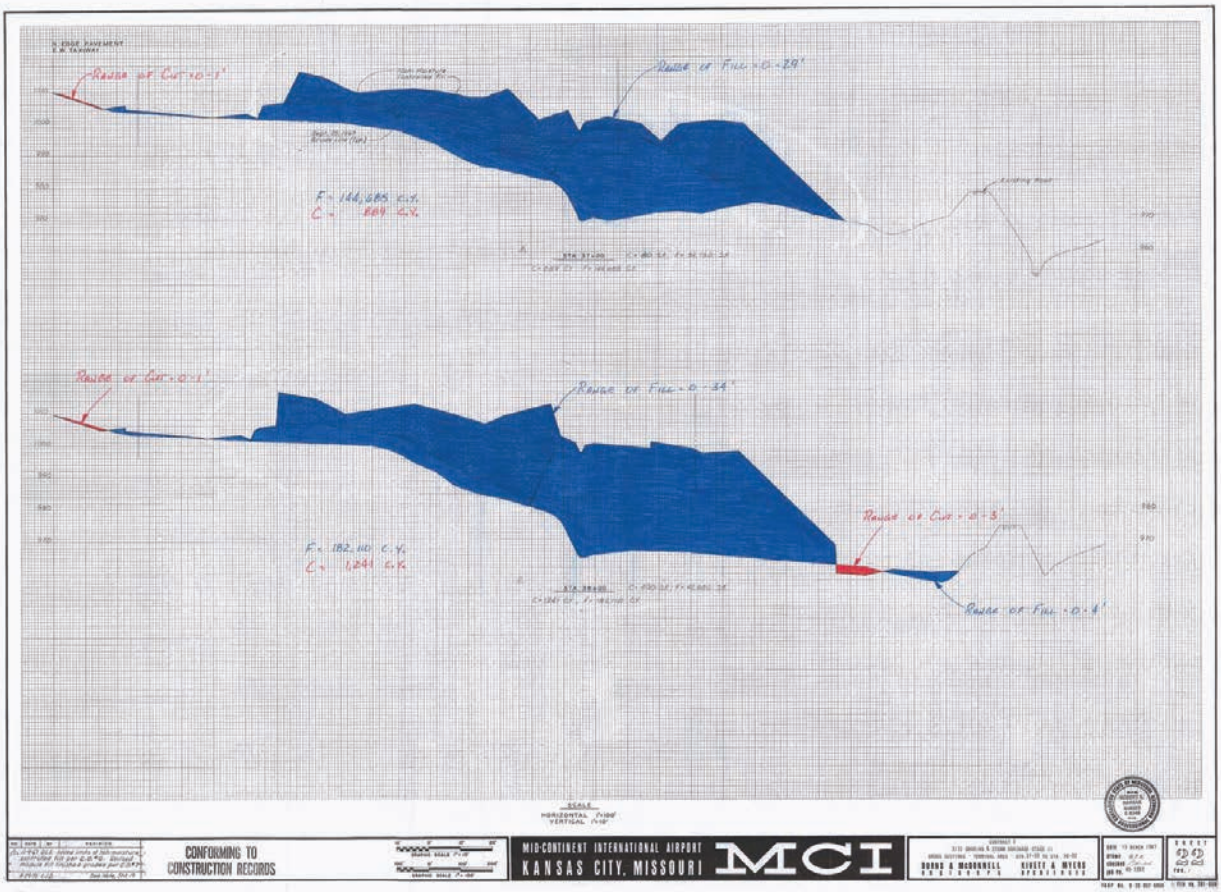
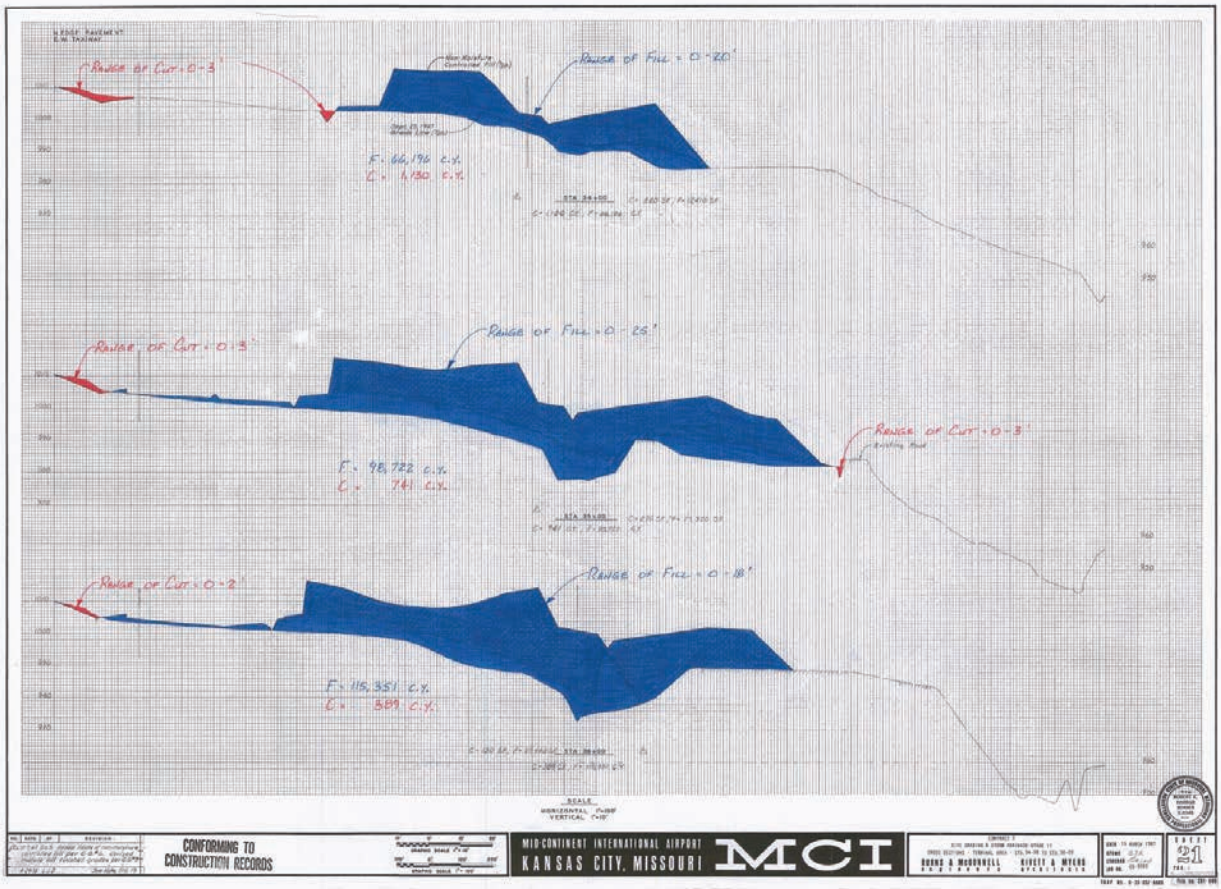
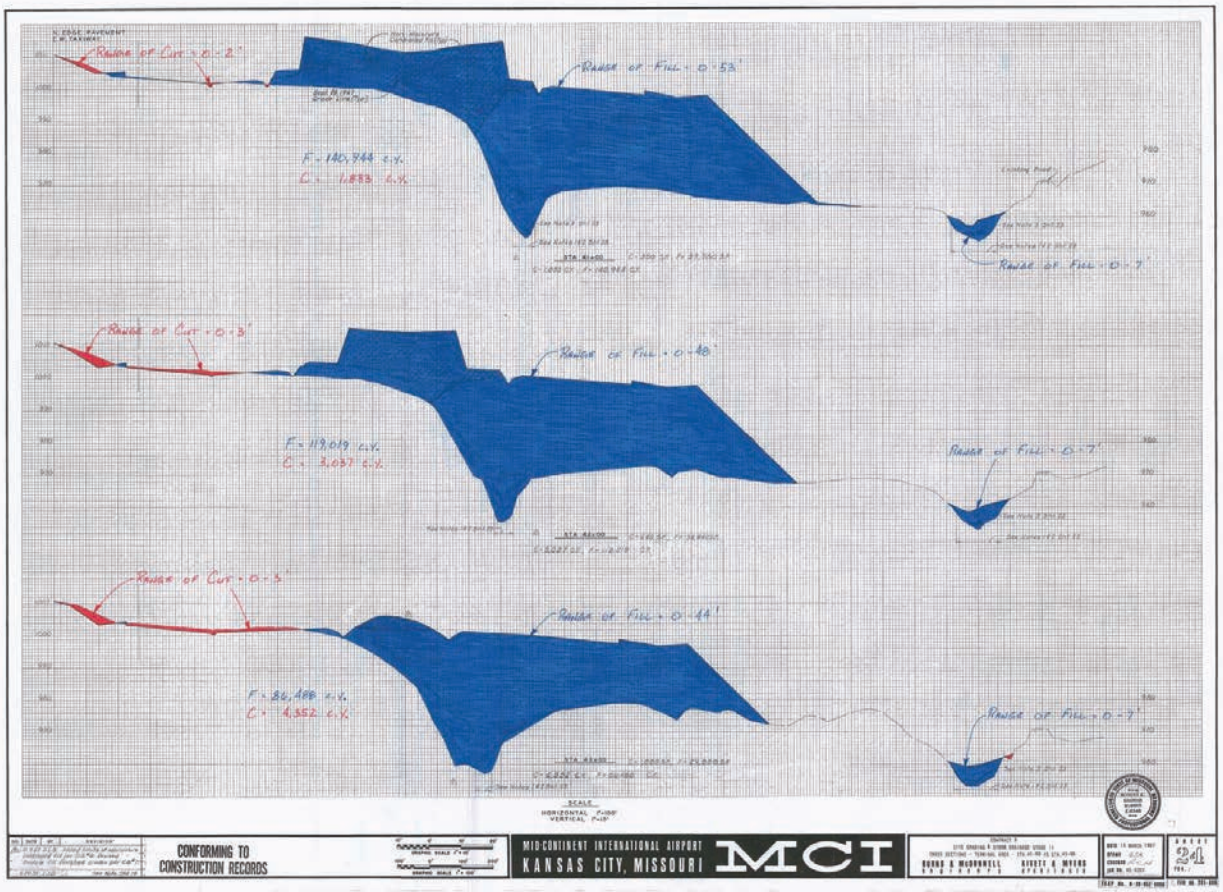
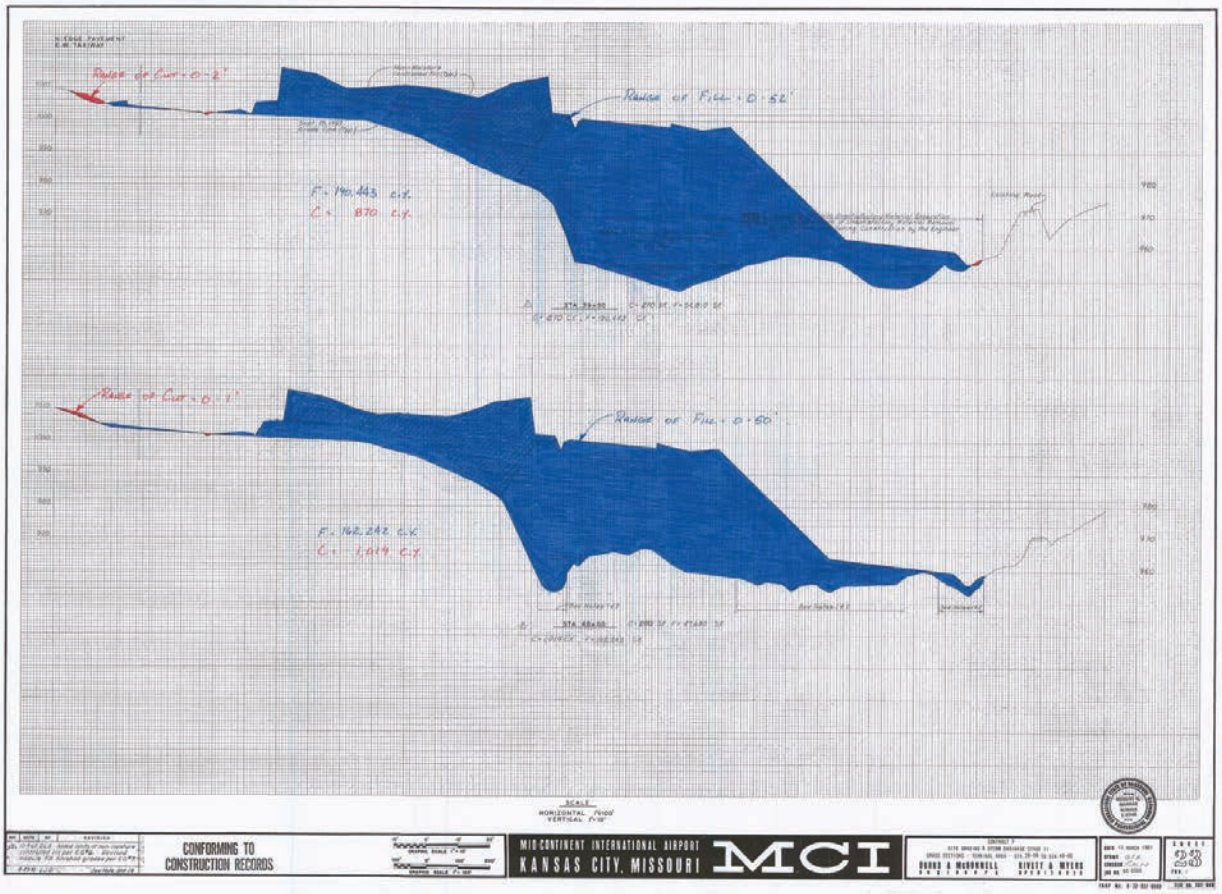
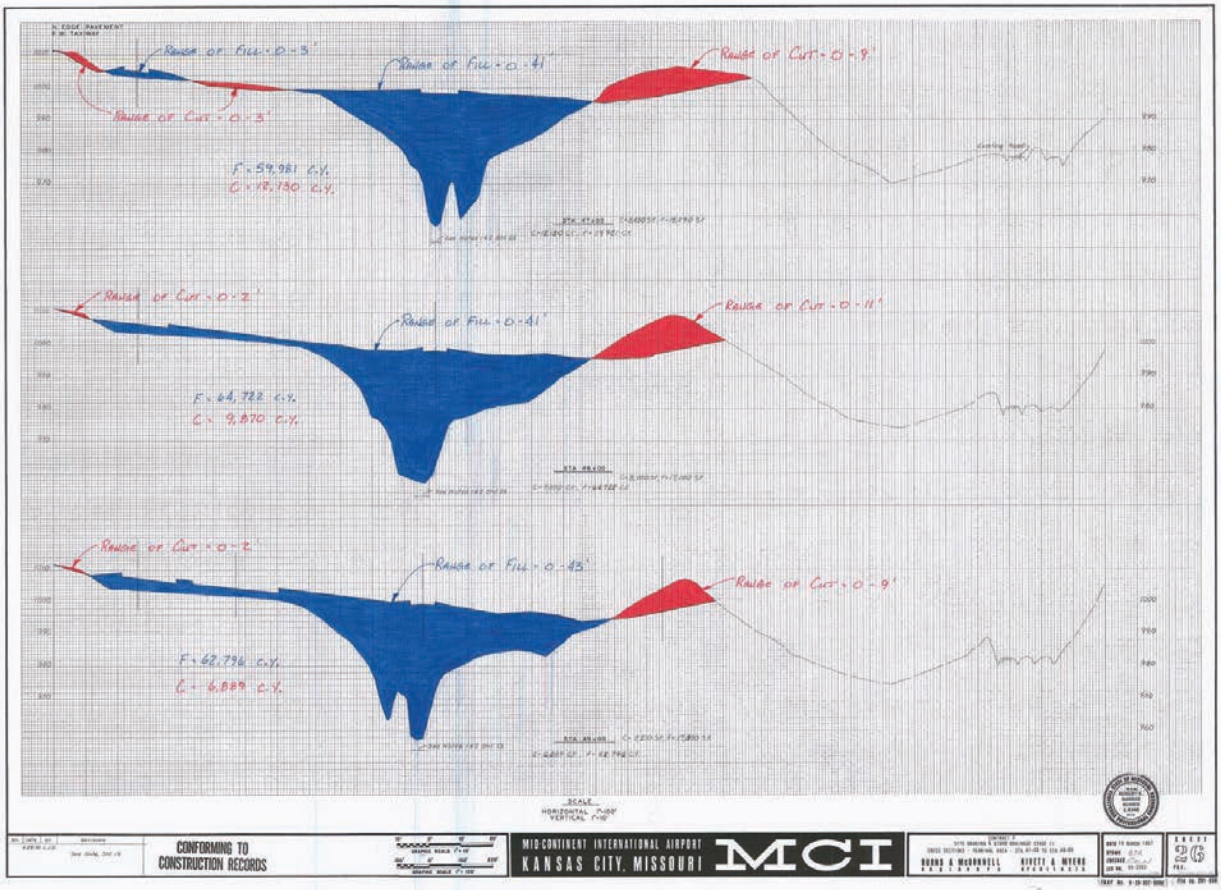
CITY OF KANSAS CITY, MISSOURI
AVIATION DEPARTMENT
KCI
EXISTING KCI TERMINALS
TERMINAL CUT SHEET LOCATIONS
SHEET 1 OF 1
A00

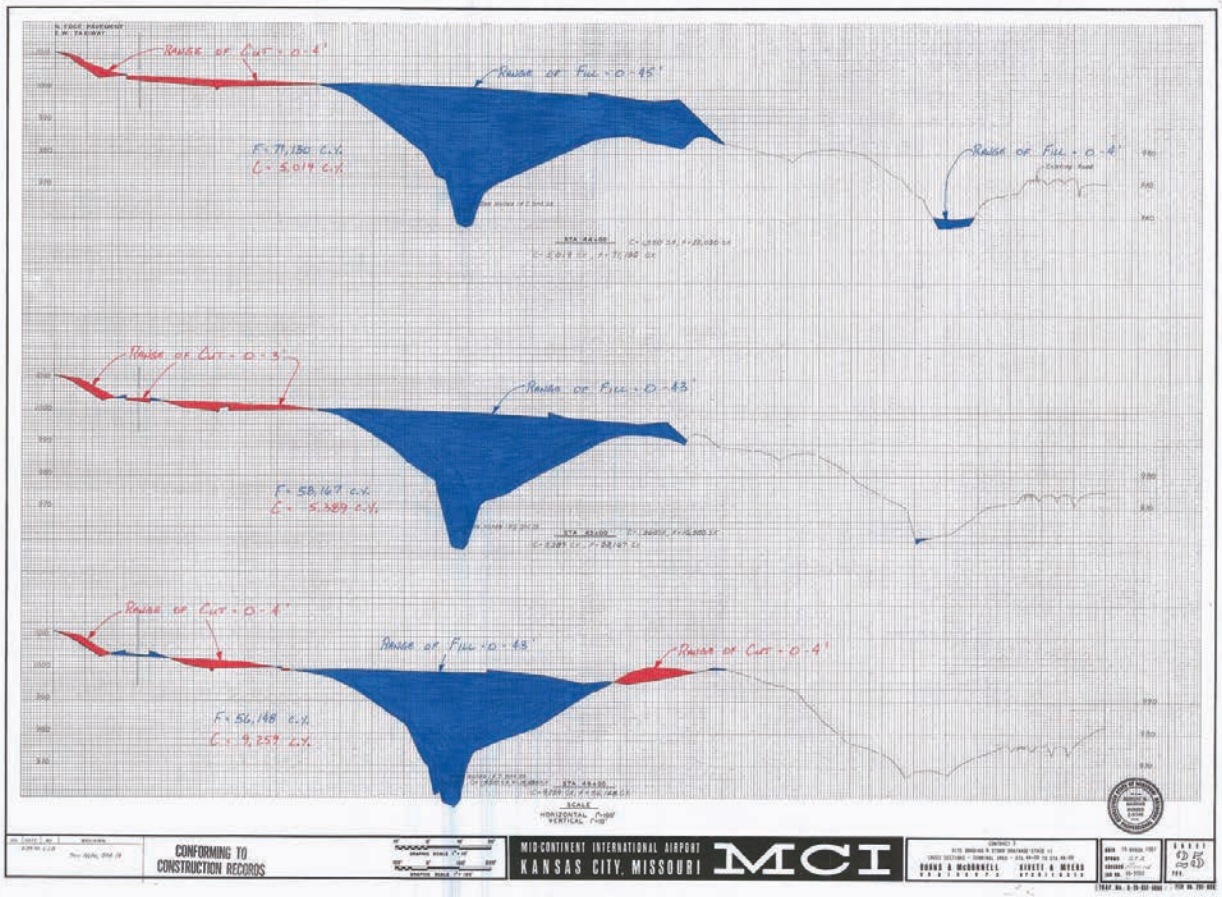

Range of Cut = 10-1'
Range of Fill = 0-29'
F = 144,685 C.Y.
C = 869 C.Y.
Range of Cut = 0-1'
Range of Fill = 0-34'
Range of Cut = 0-3'
Range of Fill = 0-4'
F = 182,110 C.Y.
C = 1,241 C.Y.
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
MCI
BURNS & McDONNELL
KIVETT & MYERS

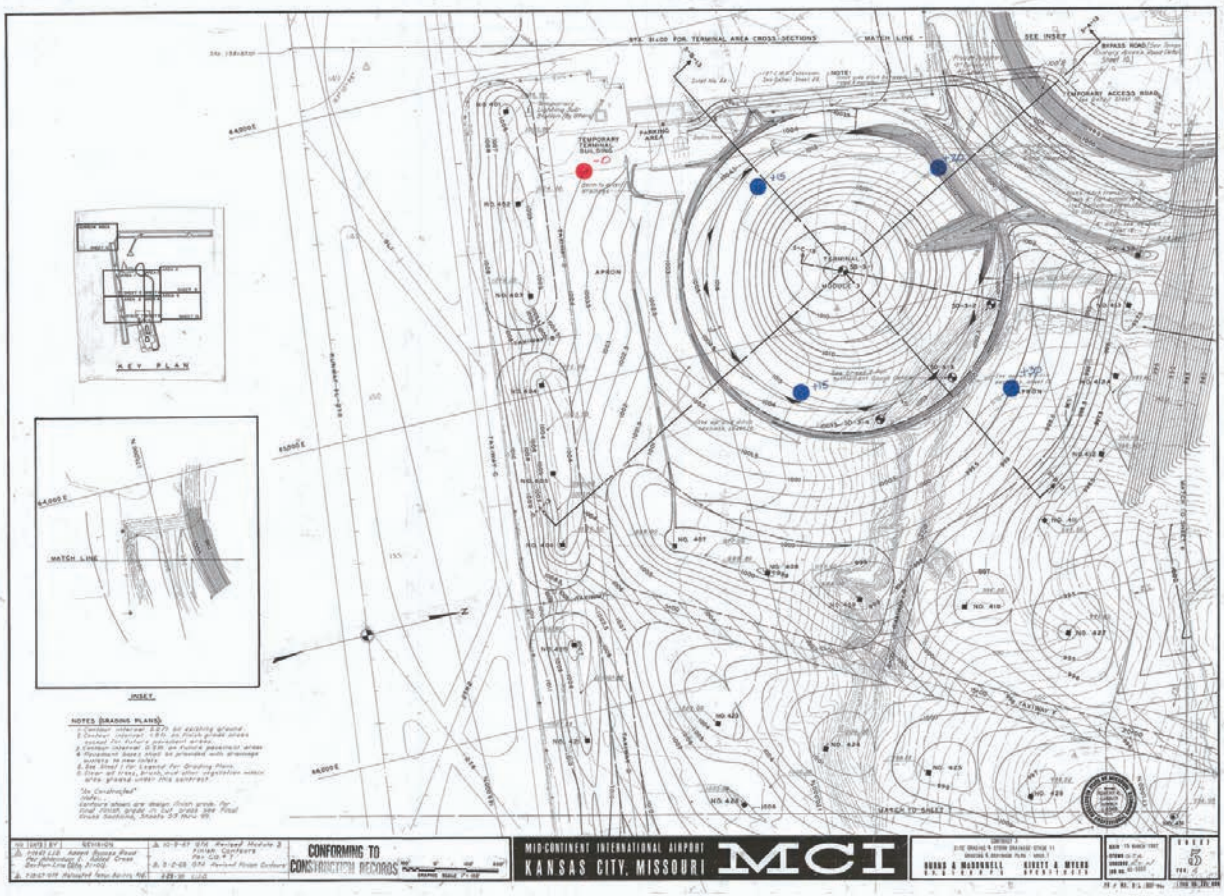

Range of Cut = 0-3'
Range of Fill = 0-20'
F = 66,196 C.Y.
C = 1,130 C.Y.
Range of Cut = 0-3'
Range of Fill = 0-25'
Range of Cut = 0-3'
F = 98,722 C.Y.
C = 741 C.Y.
Range of Cut = 0-2'
Range of Fill = 0-18'
F = 115,351 C.Y.
C = 589 C.Y.
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
MCI
BURNS & McDONNELL
KIVETT & MYERS

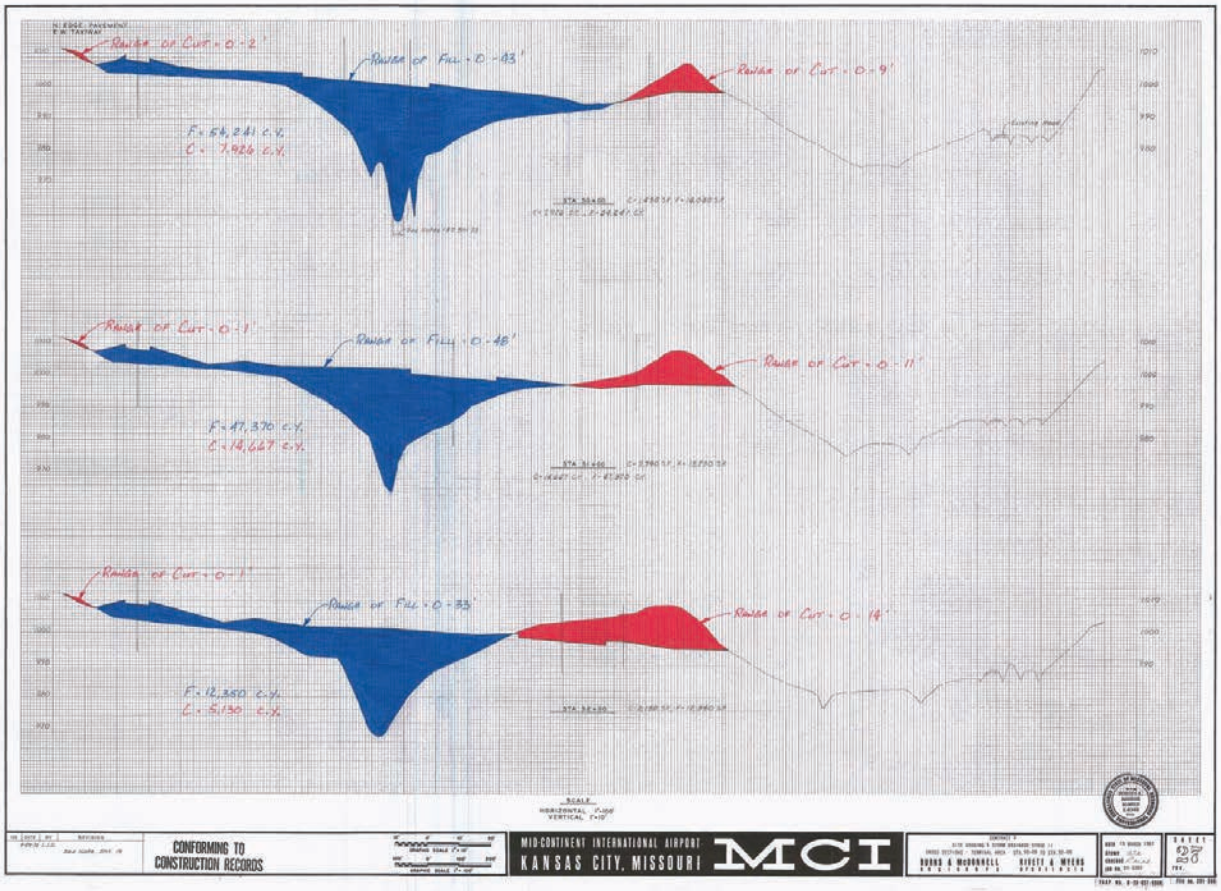

Range of Cut - 0 - 2'
Range of Fill - 0 - 53'
F - 140,944 c.y.
C - 1,833 c.y.
Range of Fill - 0 - 7'
Range of Cut - 0 - 3'
Range of Fill - 0 - 48'
F - 119,019 c.y.
C - 3,037 c.y.
Range of Fill - 0 - 7'
Range of Cut - 0 - 5'
Range of Fill - 0 - 44'
F - 86,488 c.y.
C - 4,552 c.y.
Range of Fill - 0 - 7'
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
MCI
BURNS & McDONNELL
HIVETT & MYERS
SHEET 24

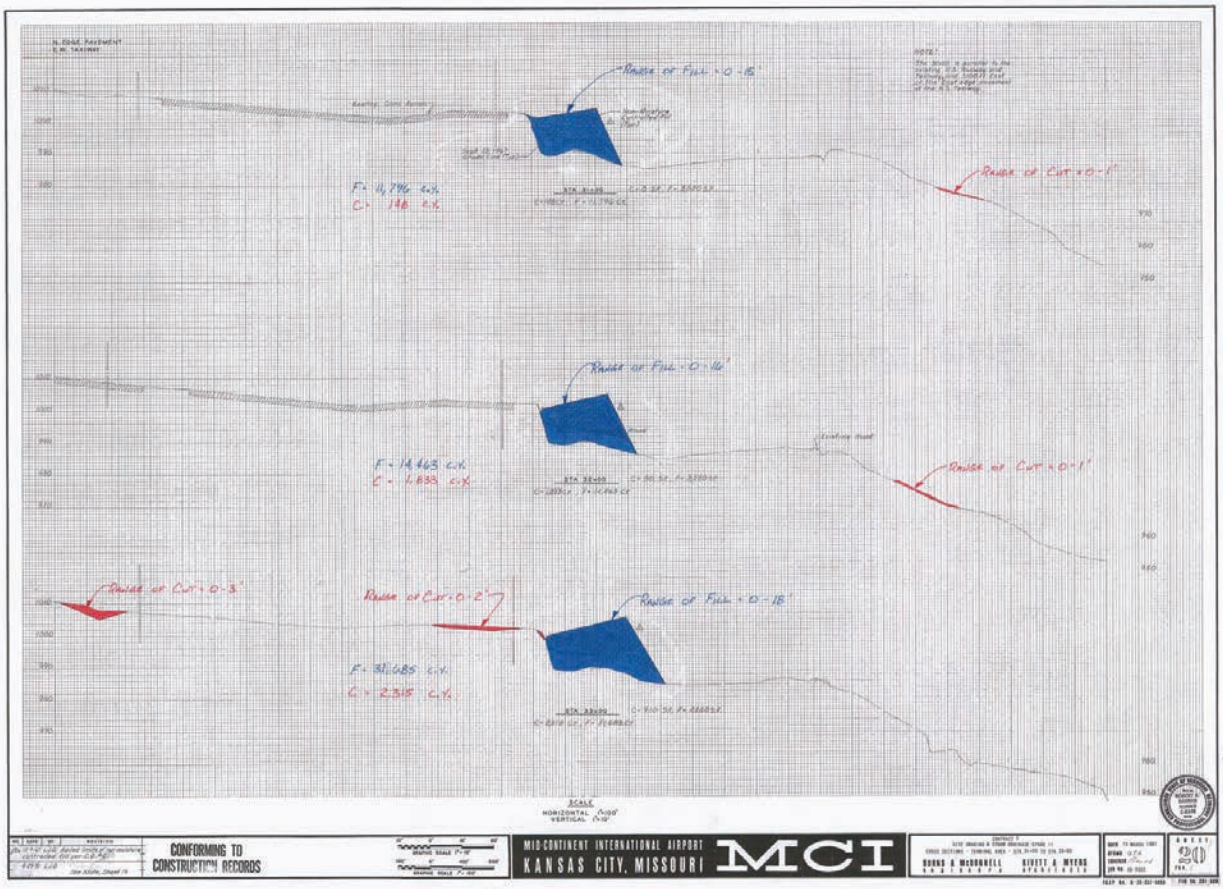

Range of Cut - 0 - 2'
Range of Fill - 0 - 52'
F - 190,443 c.y.
C - 870 c.y.
Range of Cut - 0 - 1'
Range of Fill - 0 - 50'
F - 162,242 c.y.
C - 1,019 c.y.
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
MCI
BURNS & McDONNELL
HIVETT & MYERS
SHEET 23


RANGE OF FILL - 0 - 3'
RANGE OF CUT - 0 - 3'
RANGE OF FILL - 0 - 41'
RANGE OF CUT - 0 - 9'
F - 59,981 C.Y.
C - 18,180 C.Y.
RANGE OF CUT - 0 - 2'
RANGE OF FILL - 0 - 41'
RANGE OF CUT - 0 - 11'
F - 64,722 C.Y.
C - 9,870 C.Y.
RANGE OF CUT - 0 - 2'
RANGE OF FILL - 0 - 43'
RANGE OF CUT - 0 - 9'
F - 62,796 C.Y.
C - 6,889 C.Y.
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
MCI
BURNS & McDONNELL
KIVETT & MYERS

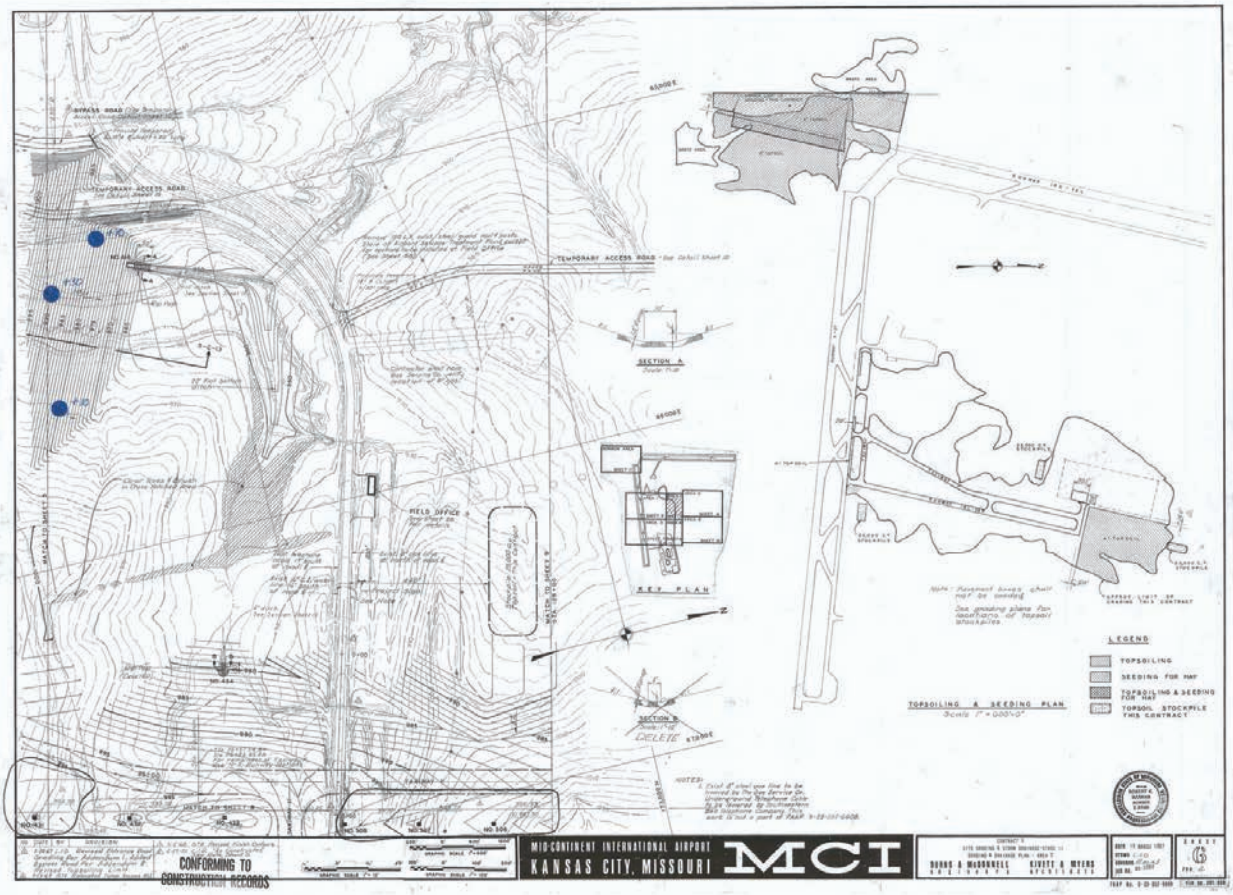

RANGE OF CUT - 0 - 4'
RANGE OF FILL - 0 - 45'
F - 71,180 C.Y.
C - 5,019 C.Y.
RANGE OF FILL - 0 - 4'
RANGE OF CUT - 0 - 3'
RANGE OF FILL - 0 - 43'
F - 58,167 C.Y.
C - 5,389 C.Y.
RANGE OF CUT - 0 - 4'
RANGE OF FILL - 0 - 45'
RANGE OF CUT - 0 - 4'
F - 56,148 C.Y.
C - 9,259 C.Y.
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
MCI
BURNS & McDONNELL
KIVETT & MYERS


KEY PLAN
INSET
MATCH LINE
NOTES (GRADING PLANS)
SEE INSET
MATCH TO SHEET
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
MCI
BURNS & McDONNELL
KIVETT & MYERS


Raise or Cut - 0 - 2'
Raise or Fill - 0 - 43'
Raise or Cut - 0 - 9'
F - 54,241 C.Y.
C - 7,926 C.Y.
Raise or Cut - 0 - 1'
Raise or Fill - 0 - 48'
Raise or Cut - 0 - 11'
F - 47,370 C.Y.
C - 14,627 C.Y.
Raise or Cut - 0 - 1'
Raise or Fill - 0 - 33'
Raise or Cut - 0 - 14'
F - 12,350 C.Y.
C - 5,130 C.Y.
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
MCI
BURNS & McDONNELL
KIVETT & MYERS

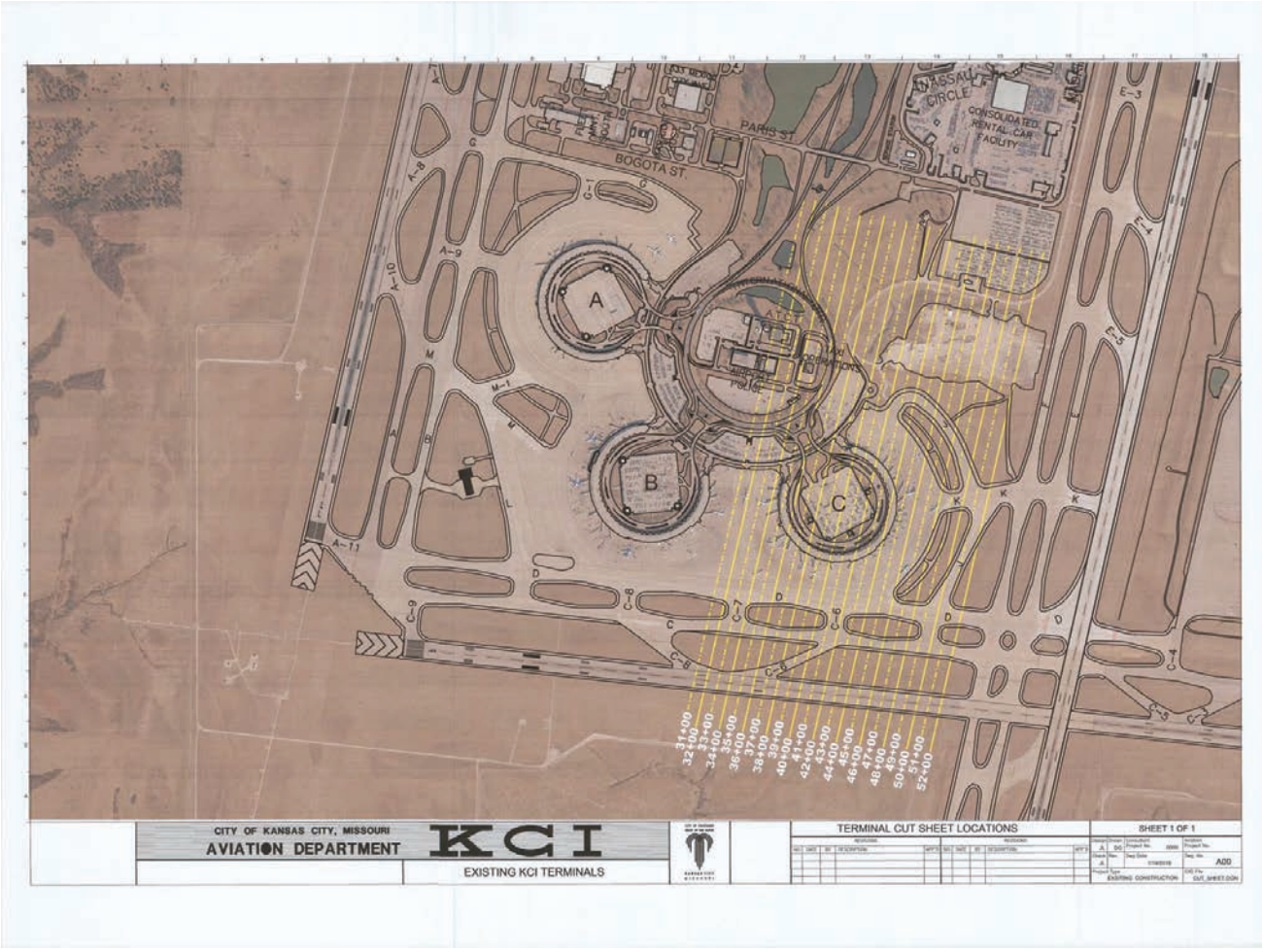


Range of Fill - 0-15'
F = 11,796 c.y.
C = 148 c.y.
Range of Cut - 0-1'
Range of Fill - 0-16'
F = 14,463 c.y.
C = 1,833 c.y.
Range of Cut - 0-1'
Range of Cut - 0-3'
Range of Cut - 0-2'
Range of Fill - 0-18'
F = 31,685 c.y.
C = 2,315 c.y.
SCALE
HORIZONTAL 1"=100'
VERTICAL 1"=10'
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
MCI
BURNS & McDONNELL
KIVETT & MYERS



TEMPORARY ACCESS ROAD
SECTION A
KEY PLAN
FIELD OFFICE
SECTION B
DELETE
TOPSOILING & SEEDING PLAN
LEGEND
TOPSOILING
SEEDING FOR HAY
TOPSOILING & SEEDING FOR HAY
TOPSOIL STOCKPILE THIS CONTRACT
CONFORMING TO CONSTRUCTION RECORDS
MID-CONTINENT INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
MCI
BURNS & McDONNELL
KIVETT & MYERS


FILL
CUT


PARIS ST.
BOGOTA ST.
MASSAU CIRCLE
CONSOLIDATED RENTAL CAR FACILITY
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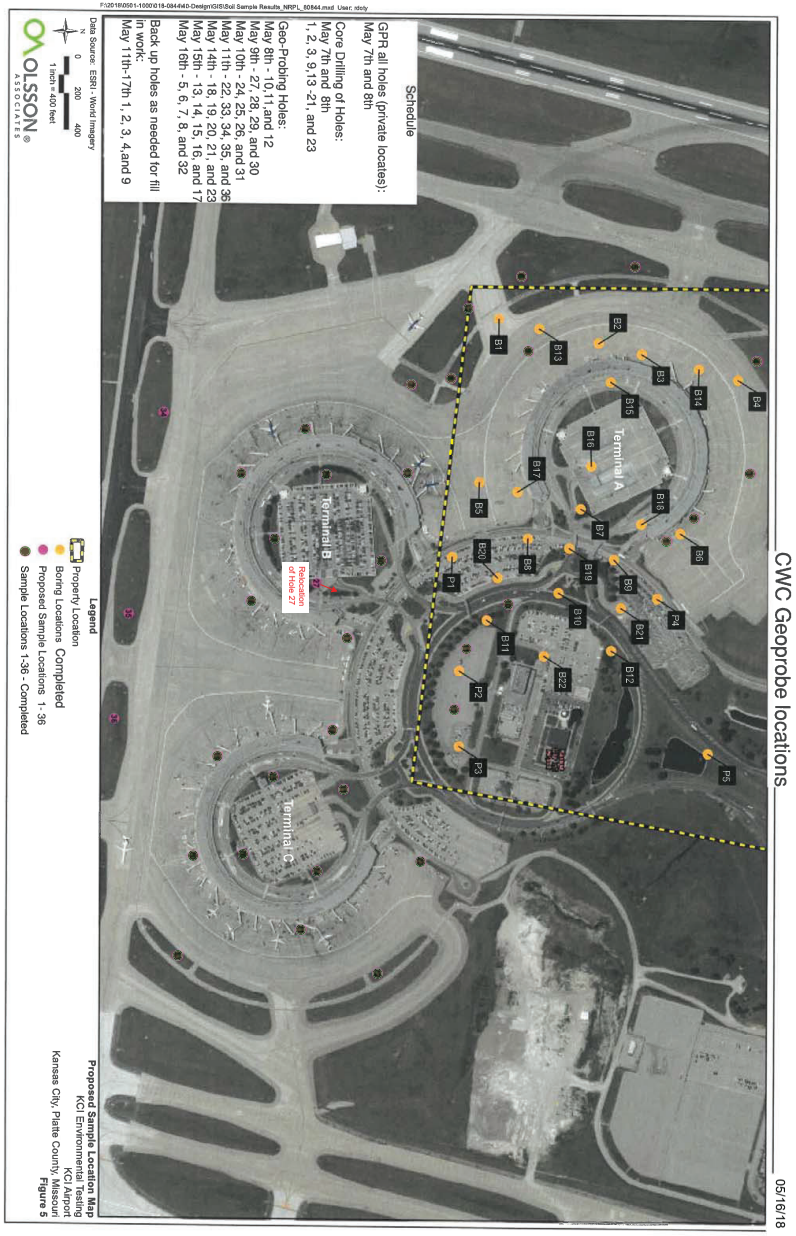
CITY OF KANSAS CITY, MISSOURI
AVIATION DEPARTMENT
KCI
EXISTING KCI TERMINALS
TERMINAL CUT SHEET LOCATIONS
SHEET 1 OF 1





DAVID WILCOX, M.A., RPA

Senior Project Archaeologist

PROFESSIONAL SUMMARY

David Wilcox has spent more than 23 years managing archaeological projects for the oil & gas, alternative energy, renewable energy sector/wind farm development, mining, and telecommunications industries, as well as several environmental and permitting projects. He has worked extensively within academic institutions, the United States Departments of Agriculture, Defense, Energy, and the Interior, and as a consultant for the private sector dealing with Cultural Resource Management. He has extensive experience working with local, county, state, federal and tribal agencies and permitting authorities. He has developed his skills and experience in over 43 U.S. States, Canada, Mexico and Venezuela. He has supervised personnel in both industrial and environmental settings, directing multiple crews of up to 24 professionals. Many of these projects involved remote locations where he also served as the field health and safety officer. He is bilingual (English/Spanish), and is a native Spanish speaker.

Specialties:

- Resourceful at guiding clients and projects through governmental regulations and laws.
- Worked with colleagues in other NA and international offices to ensure a constant flow of data sharing, expansion of resources, best practices' approach, safety issues, and client representation.
- Managed and worked with multi-disciplinary teams on technical and project management issues.
- Ensured that environmental monitoring and contingency plans were incorporated into all documents and contracts.

EMPLOYMENT HISTORY

Senior Project Archaeologist (2017 – Present)

Golder Associates Inc.; Green Bay, WI

Major responsibilities, goals and objectives include the following:

- Expanding Golder's USA archaeology program;
- Mentoring;
- Assisting clients with compliance regarding NEPA, NHPA and local regulations;
- Leading archaeological survey, assessments and excavation throughout the USA and Canada;
- Conducting laboratory and office-based work such as background research, report writing, artifact cataloguing and analysis; and,
- Working/assisting clients with State Historic Preservation Offices (SHPOs) and federally recognized tribal governments and Tribal Historic Preservation Offices (THPOs) to complete the Section 106 consultation processes.

Education

1995 M.A. Anthropology with a Geoarchaeological thesis, Eastern New Mexico University

1990 B.A. Anthropology with Geography minor, University of Miami, Florida

Certifications

Registered Professional Archaeologist (RPA)

Secretary of the Interior Qualified (SOI) in Archaeology and History

Minnesota Phase I Archaeological License

MT/ND/SD/UT/NV/CA State Wide – BLM CRU Permits

Ontario Professional Archaeological License

Texas Historical Commission #0927

Project Archaeologist (2013 – 2016)
Golder Associates Inc.; Bismarck, ND, and Green Bay, WI
Major responsibilities, goals and objectives include the following:

- Expanding Golder's USA archaeology program;
- Assisting clients with compliance regarding NEPA, NHPA and local regulations;
- Leading archaeological survey, assessments and excavation throughout the USA and Canada;
- Conducting laboratory and office-based work such as background research, report writing, artifact cataloguing and analysis; and,
- Working/assisting clients with State Historic Preservation Offices (SHPOs) and federally recognized tribal governments and Tribal Historic Preservation Offices (THPOs) to complete the Section 106 consultation processes.

Archaeologist/Field Director/Project Manager (2012)
Cogstone Resource Management Inc., Jean, NV
Eldorado-Ivanpah Transmission Project, Southern California Edison, Eldorado, NV to Ivanpah, CA.

- Supervised field operations, managed daily monitoring activities, and trained field personnel.
  - Coordinated with Southern California Edison, AECOM, construction crews, and field monitors in compliance with the project's Paleontological and Cultural Resources Management Plans. The project involved the installation of 71-miles of electrical transmission lines that crossed both BLM and private lands, a new 220/115 kV substation, associated telecommunications infrastructure, and system upgrades to ensure reliability. The upgrade created additional interconnection capacity to deliver up to 1,400 MW of renewable energy that is expected to be developed in the Ivanpah Valley.

Senior Project Manager (2012)
Timmins Martelle Heritage Consultants Inc., London, Ontario, Canada
Responsible for overseeing all aspects of field projects, including:

- Supervised TMHC Project Managers and Field Directors;
- Prepared work plans and budgets;
- Client liaison;
- Coordinated and scheduled fieldwork with the Field Operations Manager and identify/resolve logistical issues;
- Coordinated and scheduled property ingress/egress and fieldwork with clients;
- Prepared project-specific health and safety plans, project fieldwork/access protocols, and project mapping for field use;
- Reviewed project field progress, field notes and findings;
- Coordinated the completion of laboratory work with the Laboratory Manager;
- Prepared projects reports;

- Quality control review and editing of reports prepared by others;
- Completed quality control checks on all field and map data;
- Coordinated meetings and monitor work for affected First Nations;
- Prepared project invoices in consultation with TMHC's Office Manager-Administrator and track project budgets;
- Artifact analysis, site interpretation and preparation of site recommendations in keeping with provincial and First Nations requirements; and,
- Worked cooperatively with TMHC Principals and staff.

Cultural Resources Director/Principal Investigator (2010 - 2011)
Sims & Associates - LLC, Cedar Park, TX (now NewFields)

- Contract Pricing, Client/Agency Negotiation & Report Writing
  - Developed, negotiated and produced stand-alone reports covering all environmental issues to various regulatory compliance agencies. Responsible for procuring work and clients by seeking out and preparing proposals and quotes in response to Request for Quotations (RFQ) and Request for Proposals (RFP) from contracting governmental agencies and private corporations.
- Total Project Evolution
  - Managed project, and anticipated regulatory compliance agency issues by maintaining a concise project timeline. Key components included the adherence to the Scope of Work (SOW), change orders if deemed necessary, communication with clients regarding the project's process.
- Project Management & Operations
  - Managed 18+ environmental/cultural professionals, implemented new project SOW operation procedures, conducted all logistical planning, supervised budgets ranging from US$ 6,500 to 347,000, wrote all technical and final reports, was the point of contact, and was the Health & Safety officer for all projects.
- Business Development - Market Traction
  - Expanded into new areas and markets by winning RFPs and RFQs, and by hiring personnel with professional regional experience. Built a professional team capable of quick deployment to represent the company and clients, which ensured that all projects were completed on time, 100% under budget and with all regulatory compliance issues covered.
- Client/Agency Engagement
  - Excellent communication and negotiation skills required to engage all client and regulatory compliance agencies to ultimately align all interests and meet project expectations.

Key Roles:

- Managed numerous projects simultaneously
- Client, Federal, State and Native American consultation throughout the U.S.
- Permit acquisitions

- Project tracking
- Logistics and Regulatory compliance officer
- Trainer/Mentor

Cultural Resources Planner/Senior Archaeologist (2009 - 2010)
The 106 Group Ltd., St. Paul, MN
Responsible for the supervision of Phase I archaeological surveys, and Phase II archaeological evaluations throughout the Midwest.

- Conducted archival research, cultural resources assessments, artifact analysis, report writing, and all aspects of archaeological fieldwork and interpretive planning projects assuring the timely and successful completion of those projects.
- Aided in providing staff management and the general administrative support for office and field personnel.
- Assisted in proposal writing and editing.
- Facilitated and contributed in the preparation of both state and federal compliance documents, including federal environmental impact statements and programmatic agreements.
- Facilitated in the permitting process with state and local agencies, and assisted with landowner ingress and egress consent.
- Communicated with clients and provided technical proficiency in the completion of cultural resources investigations and compliance documents for a range of energy, transportation, and communication tower projects.
- Assisted in maintaining secure and open communication with clients, the State Historic Preservation Office (SHPO) and other federal agencies, the State Archaeologist, project team members, and other concerned third parties, to guarantee the smooth progress of the projects.

Senior Project Scientist/Staff Archaeologist (2005 - 2006 and 2007 - 2009)
Environmental Resources Management, Albuquerque, NM
Project supervisor in charge of FCC telecommunication cell tower NEPA/Phase I, Inventories and NPA assessments, linear right-of-way corridors for FERC, and various state projects, water lines, pipelines, oil/gas well pads, large wind farm tracks, and block survey, which entailed project coordination, permit applications, proposal writing, literature searches, field inspections, client relations, managing and directing survey projects, site recordation, and excavation, technical report writing, editing reports, lithic analysis, and supervising field personnel.

- Worked independently in the states of Alaska, Arizona, Arkansas, California, Colorado, Florida, Idaho, Illinois, Kansas, Louisiana, Missouri, Montana, Nevada, New Mexico, North Dakota, Ohio, Oklahoma, Oregon, South Dakota, Texas, Utah, Washington, Wisconsin, and Wyoming.

Project Archaeologist/Principal Investigator (2006 - 2007)
SWCA Environmental Consultants, Austin, TX
Responsible for project coordination, permit applications, proposal writing, lithic analysis, report writing and editing, numerous large and small scale cultural resource surveys, and site recordation in Andrews, Atascosa, Bastrop, Bexar,

Chambers, Ector, El Paso, Frio, Galveston, Hardin, Hidalgo, Hutchinson, Jefferson, Kendall, Liberty, Nolan, Nueces, Pecos, Taylor, Tyler, and Williamson Counties, Texas.

- These projects consisted of linear right-of-way corridors for FERC projects, TxDOT, USACOE, TPWD burn lane corridors, water lines, pipelines, oil/gas well pads, large wind farm tracks, and block surveys.

Field Director (2004 - 2005)
Prentice Thomas and Associates, Inc., Fort Walton Beach, FL
Working independently as a satellite office, my responsibilities entailed the training of the field and office personnel, supervision of all field operations, research, survey, delineation mapping and demarcation of National Register of Historic Places (NRHP) sites, GPS mapping (Trimble and Garmin) and transect placement, testing, logistics, client relations, and office management in Hinesville, Georgia in accordance with Department of Natural Resources (DNR) Guidelines.

- Worked within the Fort Stewart Military Reservation Base in Bryan, Evans and Liberty Counties, Georgia, and on Eglin Air Force Base projects in Okaloosa and Walton Counties, Florida.

Archaeologist/Staff Environmental Professional II (2002 - 2004)
E2M, Inc., Albuquerque, NM (now HDR)

- Directly assisting the Principal Investigator in completing multi-tiered cultural resource inventory, eligibility of sites, ARPA assessments, GPS mapping, artifact analyses, pace and compass mapping, drafting and report writing in Kirtland Air Force Base, Albuquerque, New Mexico.
- Conducted CRM work at the Fort Sill Military Reservation, Lawton, Oklahoma.
- Performed a 2434-acre cultural resources inventory in Candy Lake, Osage County, Oklahoma.
- Completed a Phase I archaeological survey for the Alpena Readiness Training Center, Alpena, Michigan.
- Conducted inventory assessments of National Guard Armories throughout the State of Georgia.

Cultural Resource Specialist/Project Supervisor III (2001 - 2002)
Pacific Legacy, Inc., Cameron Park, CA
Responsible for project coordination, report writing and editing, cost proposals, client relations, surveys, site recordation, monitoring, and mitigations in Tuolumne, Calaveras, Trinity, El Dorado, Yolo, Placer, Lassen, Mono, Tehama, Kern, Lake, Sutter, Fresno, Kings and Santa Barbara Counties, California.

Cultural Resource Consultant/Environmental Specialist (2001)
Trigon-Sheehan, LLC, Durango, CO (now CH2M HILL)
Wrote reports, did literary research, mapping, surveys (cultural, wetland and avifauna), and represented the company when dealing with the client.

- Worked independently throughout the State of Oklahoma assessing Duke Energy Field Services' pipeline right-of-way's and storm water pollution prevention plans.

Archaeologist/Geoarchaeologist (2000 - 2001)
Rare Earth Studies, Albuquerque, NM
Carried out archaeological & geoarchaeological surveys, excavations & investigations and developed reports & analyses of findings for presentation to clients in New Mexico and Texas.

- Played a key role in preparing proposals and quotes in response to RFQs and RFPs from contracting governmental agencies and private corporations.

Project Director/Supervisor (1994 – 2000)
Desert West Archaeological Services, Inc., Carlsbad, NM
Responsible for the training of field and office personnel, supervision of all field operations, report writing, research, mapping, survey, excavations, analyses of data, artifact illustrations and client relations.

- Worked on Federal, State, Department of Defense, National Park Service, Forest, and Fee lands in Eddy, Lea, Santa Fe, Torrance, Bernalillo, Chaves, Roosevelt, De Baca, Lincoln, Guadalupe and Otero Counties, New Mexico, and Hudspeth County, Texas.

Staff Archaeologist (1994)
Cultural Resources Management Consultants, Inc., Carlsbad, NM
Assigned to survey, map, write reports, and also included pre-field literature searches, in-field client relations, and artifact illustrations.

Field Archaeologist (1994 [summer])
Centennial Archaeology, Fort Collins, CO
Surveyed the Diamond Shamrock Petroleum Pipeline right-of-way throughout southeastern New Mexico.

Field Archaeologist (1994 [spring])
Agency for Conservation Archaeology, Eastern New Mexico University, Portales, NM
Surveyed the Melrose Bombing Range extension, Melrose, New Mexico.

Field Archaeologist (1993 [summer])
Richard G. Haiduven Archaeological Consultants, Inc., Miami, FL
Excavated the Harwood II Estates, Carol City, Florida.

Field Archaeologist/Geoarchaeologist (1993 [summer])
Archaeological and Historical Conservancy, Inc., Miami, FL

- Surveyed "The Hollow" at Cape Florida, Key Biscayne, Florida after Hurricane Andrew.
- Excavation at the Bonita Bay Project, Phase IV, Bonita Springs, Florida.

Field Supervisor (1993 [spring])
Eastern New Mexico University, Portales, NM

Managed individual crews of geoarchaeology graduate students in mapping and collecting for the Burnt Caliche Project, Portales, New Mexico.

Crew Chief (1992 [(summer])
Proyecto Arqueologico de Chihuahua, El Terrero, Chihuahua, Mexico
Surveyed and excavated in the Santa Maria Valley for a project sponsored by the University of Calgary, Alberta, Canada.

Archaeological Crew Leader (GS-7) (1991 [summer])
Stanislaus National Forest, Mi-Wok Ranger District, CA
Managed and directed a crew that surveyed areas for insect salvage sales, and fire recovery projects, and performed some Phase II testing.

Participant (1991 [summer])
Eastern New Mexico University, Portales, NM
Rio Bonito Archaeological Project, Capitan, New Mexico. Excavation and survey within the Rio Bonito Valley.

Field Archaeologist (1989 – 1990)
Archaeological and Historical Conservancy, Inc., Miami, FL

- Excavated at the Ortona Indian Mounds.
- Surveyed the Florida Panther Reserve, Sunniland, Florida.
- Surveyed on the Seminole Heritage Survey, Big Cypress Reservation, Florida.
- Assisted with the Fisheating Creek Survey, Palmdale, Florida.
- Part of a salvage recovery crew team that excavated human remains at Silver Lakes, Hollywood, Florida.
- Excavated at the Bonita Bay Phase II Project, a secondary burial mound in Bonita Springs, Florida.
- Excavated the Madden's Hammock Project, Miami, Florida.

Vice-President (1986 – 1990)
Wilmart Inc., Coral Gables, FL
Responsibilities at this import/export company demanded my personal attention to all international quotations regarding industrial machinery requests. This entailed either telecommunications with the client's plant engineers, or generally demanded my presence overseas to get the appropriate specifications from plant managers regarding the procurement of parts, machinery, or entire assembly lines, and arrange for their international shipment and installation. Most of the necessary travel was in South America.

Tour Manager (1984 – 1986)
Shopping Center Network, Miami, FL
Represented this marketing firm throughout the continental United States as a liaison between the main client (i.e., Chevrolet, AT&T, Maybelline, and the State of California) and the venue's management. Managed the erection and striking of exhibits in trade shows and shopping malls to the client specifications and building permits. Hired temporary employees to staff the displays, and

maintained the displays, during the function and moved the show by commercial trucks to the next venue.

Maintenance Programmer (1983 – 1984)
Sidor C.A., Caracas, Venezuela
Part of a team in charge of preventative maintenance, building the required parts needed at this steel mill.

Maintenance Personnel (1982 - 1983)
Cementos Caribe C.A., Puerto Cumarebo, Venezuela
Assigned to perform regular repairs and diagnostic evaluation for the heavy equipment machinery (i.e., Caterpillar, Case, John Deer, Komatsu) at this cement plant.

RELEVANT EXPERIENCE

PROJECT EXPERIENCE – WATER RESOURCES

Rainy River Cultural Resource Survey
Minnesota, USA
Rainy River Cultural Resource Vulnerability Study for the International Joint Commission from Manitou Rapids to International Falls, MN (2016).

Hickory Ground Water Development Re-Alignment Project
Texas, USA
Archaeological Survey of the 13.5 Mile Hickory Ground Water Development Re-Alignment Project in McCulloch and Concho Counties, Texas (2011). Prepared for the City of San Angelo Department of Water Utilities, San Angelo, Texas.

Hickory Ground Water Development Project
Texas, USA
Cultural Resources Survey of the 65-Mile Hickory Ground Water Development Project, McCulloch, Menard, Concho, and Tom Green Counties, Texas (2010). Prepared for the City of San Angelo Department of Water Utilities, San Angelo, Texas.

Brushy Creek Regional Utility Waterline
Texas, USA
An Intensive Cultural Resources Survey of the Brushy Creek Regional Utility Waterline Segment 2C Project in Williamson County, Texas (2007). Prepared for the Brushy Creek Regional Utility Authority.

United States Section, International Boundary and Water Commission (USIBWC) Rio Grande Canalization Project
New Mexico and Texas, USA
Cultural Resource Class I Survey and Geoarchaeologic Study: USIBWC Rio Grande Canalization Project, Sierra and Dona Ana Counties, New Mexico and El Paso County, Texas (2001). Prepared for the United States Section International Boundary Water Commission.

Carlsbad Caverns and Guadalupe Mountains National Parks' Water Transmission Line, Utility Access Corridor and Storage Systems.
New Mexico, USA
Water Transmission Line, Utility Access Corridor and Storage Systems (1999). Prepared for the United States Department of Interior's Carlsbad Caverns & Guadalupe Mountains National Parks.

PROJECT EXPERIENCE – ARCHAEOLOGY

Town of Silver Cliff Sand and Gravel Pit
Wisconsin, USA
Cultural Resources Survey: Town of Silver Cliff Sand and Gravel Pit, Marinette County, Wisconsin (2017). Prepared for the Town of Silver Cliff, Athelstane, WI.

Wisconsin Central LTD (WCL) Haley Siding, Wood Road Realignment
Minnesota, USA
Archaeological Survey: Wisconsin Central LTD (WCL) Haley Siding, Wood Road Realignment, St Louis County, Minnesota (2017). Prepared for Krech Ojard & Associates, Inc., Duluth, MN.

Manitowoc Fiber Optic Route
Wisconsin, USA
Cultural Resource Assessment Survey: Manitowoc Fiber Optic Route, Manitowoc County, Wisconsin (2016).

Canadian National Railway BAU MAR 2014 Archaeological Investigation TWR.CEN.ULLIN.34400
Illinois, USA
Archaeological Investigations of the CN BAU MAR 2014 TWR.CEN.ULLIN.34400 Base Tower Site in Ullin, Pulaski County, Illinois (2014).

Wisconsin Central Ltd. Blair Yard
Wisconsin, USA
Cultural Resources Survey: Wisconsin Central Ltd. Blair Yard on the Whitehall Subdivision, Mileposts 167.5-169.0, Jackson and Trempealeau Counties, Wisconsin (2014).

Bastrop State Park Fire Burn Lanes
Texas, USA
A Cultural Resources Survey of 28-Miles of Prescribed Fire burn lanes, Bastrop State Park, Bastrop County, Texas (2007). Prepared for Texas Parks & Wildlife Department.

Cultural Resources Survey at Fort Stewart Military Reservation
Georgia, USA
Cultural Resources Survey at Fort Stewart Military Reservation (NRMUs A2.3, A7.2, A18.4, B18.2, B18.3, B19.3, B19.4, C3.3, C6.3, C17.4, F15.4 & F15.5) in Bryan and Liberty Counties, Georgia. Prepared for the national Park Service and the Southeast Archaeological Center.

Archaeology of the Western Manzanita Mountains
New Mexico, USA
Archaeology of the Western Manzanita Mountains: Cultural Resource Survey of the West-Central portion of Kirtland Air Force Base and Department of Energy lands Withdrawn from the US Forest Service, Bernalillo County, New Mexico (2005). Submitted to 377 MSG/CE, Environmental Branch, Kirtland Air Force Base, New Mexico.

Presence and Distribution of Subsurface Cultural Deposits
New Mexico, USA
Presence and Distribution of Potentially Significant Subsurface Cultural Deposits at AR-03-03-05-267 (LA 81720), Kirtland Air Force Base, Bernalillo County, New Mexico (2003). Prepared for Department of Energy, Kirtland Air Force Base and the USDA-Forest Service, Cibola National Forest, New Mexico.

Coyote Springs Archaeological Damage Assessment Report
New Mexico, USA
Archaeological Damage Assessment Report: Coyote Springs Rockshelter Archaeological Resource (LA 2333), Kirtland Air Force base, Bernalillo County, New Mexico (2003). Submitted to 377 MSG/CE, Environmental Branch, Kirtland Air Force Base, New Mexico.

Eastern Portion Survey of the Manzanita Mountains Project
New Mexico, USA
The Archaeology of the Manzanita Mountains: 2002 Survey of the Eastern Portion of Kirtland Air Force base and Department of Energy Lands Withdrawn from the US Forest Service, Bernalillo County, New Mexico (2003). Prepared or Kirtland Air Force Base and USDA-Forest Service, Cibola National Forest, New Mexico.

NRHP Eligibility of Nine Archaeological Sites
Oklahoma, USA
National Register of Historic Places Eligibility Evaluation of Nine Archaeological Sites, Fort Sill Military Reservation, Comanche County, Oklahoma (2002). Prepared for the Directorate of Environmental Quality, Fort Sill Military Reservation, Oklahoma.

Results from Subsurface Testing Three Sites
New Mexico, USA
Results From Subsurface Testing Along the Proposed Kirtland Air Force Base Fence Corridor Boundary Crossing LA 38141, LA 131735 and LA 131739, Kirtland Air Force Base, Bernalillo County, New Mexico (2002). Prepared for Kirtland Air Force Base, New Mexico.

Work Plan for Testing Three Sites
New Mexico, USA
Work Plan for Testing Sites LA 38141, LA 131735 and LA 131739 Located Along the Proposed Kirtland Air Force Base Fence Corridor Boundary, Kirtland

Air Force Base, Bernalillo County, New Mexico (2002). Prepared for Kirtland Air Force Base, New Mexico.

Site Testing and National Register Eligibility Evaluation of Six Archaeological Sites
New Mexico, USA
Site Testing and National Register Eligibility Evaluation of Six Archaeological Sites Located along the Proposed Fence Line Route, Kirtland Air Force Base, Bernalillo County, New Mexico (2002). Submitted to the 377 MSG/CE Environmental Branch, Kirtland Air Force base, New Mexico.

Arco-Permian's Proposed 1280 Acre Track project
New Mexico, USA
Archaeological Block Survey of Arco-Permian's Proposed 1280 Acre Track of Land: Entirely Encompassing Sections 1 and 2, T23S, R31E, NMPM, Eddy County, New Mexico (1997). Report submitted to the Bureau of Land Management, Carlsbad Field Office, New Mexico.

Cedar Breaks Project
New Mexico, USA
A Data Recovery Plan for LA 43319, The Turner "B" Cedar Breaks Project, Eddy County, New Mexico (1996). Report submitted to Devon Energy Operating Corporation.

PROJECT EXPERIENCE – BAKKEN OIL/GAS, AND ASSOCIATED PROJECTS

Pad 10
North Dakota, USA
A Class III Cultural Resource Survey: Pad 10, Mountrail County, North Dakota (2017). Submitted to Andeavor Logistics LP.

Johnson's Corner Storage Hub
North Dakota, USA
A Class III Cultural Resource Survey: Johnson's Corner Storage Hub, McKenzie County, North Dakota (2016). Submitted to Tesoro Logistics GP, LLC.

BakkenLink Integration-Oasis to Dry Creek Connection
North Dakota, USA
A Class III Cultural Resource Survey: BakkenLink Integration-Oasis to Dry Creek Connection, McKenzie County, North Dakota (2016). Submitted to Tesoro Logistics GP, LLC.

BakkenLink Integration-Oasis to Dry Creek
North Dakota, USA
A Class III Cultural Resource Survey: BakkenLink Integration-Oasis to Dry Creek, McKenzie County, North Dakota (2016). Submitted to Tesoro logistics GP, LLC.

1 Acre Three Forks Terminal Expansion Site
North Dakota, USA
A Class III Cultural Resource Survey: 1 Acre Three Forks Terminal Expansion Site, McKenzie County, North Dakota (2106). Submitted to Tesoro Logistics GP, LLC.

Johnson's Corner Terminal Expansion Site
North Dakota, USA
A Class III Cultural Resource Survey: Johnson's Corner Terminal Expansion Site, McKenzie County, North Dakota (2016). Submitted to Tesoro Logistics GP, LLC.

Three Forks to DAPL Connection
North Dakota, USA
A Class III Cultural Resource Survey: Three Forks to DAPL Connection, McKenzie County, North Dakota (2106). Submitted to Tesoro Logistics GP, LLC.

BASH to DAPL Pipeline Connection
North Dakota, USA
A Class III Cultural Resource Survey: BASH to DAPL Pipeline Connection, Williams County, North Dakota (2016). Submitted to Tesoro Logistics GP, LLC.

Legacy Well Lease and Access Road for the Hansen Pager 12-5H
North Dakota, USA
A Class III Cultural Resource Survey for the Hansen Pager 12-5H Well Pad and Associated Access Corridor in Bottineau County, North Dakota (2014).

Legacy Well Lease and Access Road under Permit A73-13
Manitoba, Canada
Heritage Resources Impact Assessment of Legacy Oil + Gas Inc. 13B-32-1-28 WPM Well Lease and Access Road Northwest of Lyleton, Manitoba (2014).

CNRL Pipeline under Permit 13-206
Saskatchewan, Canada
Heritage Resources Impact Assessment of Canadian Natural Resources Limited Pipeline 13-14 to 5-13-3-2 W2M South of Oxbow, Saskatchewan (2013).

Crescent Point Pipeline and Well Leases under Permit A55-13
Manitoba, Canada
Heritage Resources Impact Assessment of Crescent point Energy Corp. 15-22 to 3-27-11-29 WPM Pipeline, CPEC Manson HZNTL 3A-3-10-28 WPM, and CPEC Manson HZNTL 10C-8-13-28 WPM Near Elkhorn, Manitoba (2013).

Legacy Flowline under Permit A66-13
Manitoba, Canada
Heritage Resources Impact Assessment of Legacy Oil + Gas Inc. 9-29-1-27 to 12-29--1-27 WPM East of Lyleton, Manitoba (2013).

Legacy Flowline under Permit A73-13

Manitoba, Canada
Heritage Resources Impact Assessment of Legacy Oil + Gas Inc. 9-30-1-28 to 1-30 and 8-30-1-28 WPM Flowline West of Lyleton, Manitoba (2013).

Legacy Pad Site under Permit A74-13
Manitoba, Canada
Heritage Resources Impact Assessment of Legacy Oil + Gas Inc. 8-30-1-28 WPM Pad Site West of Lyleton, Manitoba (2013).

Adonai Pipeline under Permit 13-205
Saskatchewan, Canada
Heritage Resources Impact Assessment of Adonai Resources Federated Co-operative Limited Glen Ewen Pipeline 7-25 to 5-31-2-1 W2M South of Oxbow, Saskatchewan (2013).

SaskEnergy Limited Pipeline under Permit 13-164
Saskatchewan, Canada
Heritage Resources Impact Assessment of SaskEnergy Ltd. SW 24-39-4 to NW 13-39-4 W3M Pipeline West of Osler, Saskatchewan (2013).

Legacy Pipeline under Permit A51-13
Manitoba, Canada
Heritage Resources Impact Assessment of Legacy Oil + Gas Inc. 1-3-2-28 to 4-35-1-28 WPM Pipeline Northeast of Lyleton, Manitoba (2013).

CPEC Flowline and Well Lease under Permit No, A13-13
Manitoba, Canada
Heritage Resources Impact Assessment of Crescent Point Energy Corp. Flowline and Well Lease North of Elkhorn, Manitoba (2013).

CPEC Pipelines and Well Lease under Permit No, A14-13
Manitoba, Canada
Heritage Resources Impact Assessment of Crescent Point Energy Corp. Pipelines Southwest, and Well Lease North of Elkhorn, Manitoba (2013).

CNRL Well Leases and Pipelines under Permit No. A22-013
Manitoba, Canada
Heritage Resources Impact Assessment of Canadian Natural Resources Ltd. Well Leases and Pipelines South of Pierson, Manitoba (2013).

Legacy Well Leases and Flow Lines under Permit No. A20-13
Manitoba, Canada
Heritage Resources Impact Assessment of Legacy Oil + Gas Inc. Well Leases and Flow Lines in the Pierson and Coulter Project Areas, Manitoba (2013).

Legacy Pipeline from 9-32 to 14-36-1-28 WPM under Permit No. A17-13
Manitoba, Canada
Heritage Resources Impact Assessment of Legacy Oil + Gas Inc. Pipeline North of Lyleton, Manitoba (2013).

SaskPower Reconnaissance and Shovel Testing for Buried Features and Artifacts
Saskatchewan, Canada
Heritage Resources Impact Assessment of SaskPower Dragline Walk Near overhead Transmission Lines South of Estevan, Saskatchewan (2013).

SaskPower Boundary Dam Pipeline Survey
Saskatchewan, Canada
Heritage Resources Impact Assessment of SaskPower Pipeline South of Estevan, Saskatchewan (2013).

Phase I Environmental Site Assessment for Weatherford International, LLC
North Dakota, USA
Phase I Environmental Site Assessment at 11160 32nd Street SW Dickinson, North Dakota, 58601 (2013).

Aggregate Resource Evaluation for OXY-Occidental Petroleum Corporation
North Dakota, USA
Phase IA Aggregate Resource Potential Evaluation and a Phase II Site-Specific Evaluation in T143N-R95W-Sec 31, North Dakota (2013).

PROJECT EXPERIENCE – PIPELINES

Tesoro High Plains Pipeline Easement & Right-Of-Way Renewal Project
North Dakota, USA
Class III Cultural Resource Survey: Tesoro High Plains Pipeline Easement & Right-Of-Way Renewal Project, Dunn and McKenzie Counties, North Dakota (2018). Prepared for Andeavor Logistics LP.

Oasis Helix Lite Pipeline
North Dakota, USA
Class III Cultural Resource Survey: Oasis Helix Lite Pipeline, Mountrail County, ND (2018). Prepared for Andeavor Logistics LP.

XTO North Fork Pipeline
North Dakota, USA
Class III Cultural Resource Survey: XTO North Fork Pipeline, McKenzie County, ND (2017). Prepared for Andeavor Logistics LP.

Oasis Loop Pipeline
North Dakota, USA
Class III Cultural Resource Survey: Oasis Loop Pipeline, Mountrail County, ND (2017). Prepared for Tesoro Logistics GP, LLC.

Hidden Bench Phase 2 Gathering System
North Dakota, USA

A Class III Cultural Resource Survey: Hidden Bench Phase 2 Gathering System, McKenzie County, North Dakota (2016). Prepared for Tesoro Logistics GP, LLC.

Alexander North Pipeline
North Dakota, USA
A Class III Cultural Resource Survey: Alexander North Pipeline, Mckenzie County, North Dakota (2015). Prepared for Tesoro Logistics GP, LLC.

Powder River Pipeline Relocation Project
Colorado, USA
An Archaeological Survey of the ConocoPhillips Powder River Pipeline Relocation Project, Crowley County, Colorado (2008). Prepared for ConocoPhillips Pipeline Company.

El Paso Natural Gas River Crossing Project
Texas, USA
An Archaeological Survey of the El Paso Natural Gas Line 1114-Canadian River Crossing, Hutchinson County, Texas (2007). Prepared for El Paso Corporation.

El Paso Natural Gas Line Repair and Replacement Project
Texas, USA
An Archaeological Survey of the El Paso Natural Gas Line 1115 Repair and Replacement Projects, Andrews County, Texas (2007). Prepared for El Paso Corporation.

El Paso Natural Gas Line Replacement Project
Texas, USA
An Archaeological Survey of the El Paso Natural Gas Line 1105 Replacement Project, Ector County, Texas (2007). Prepared for El Paso Corporation.

Chevron West Texas LPG Pipeline Project
Texas, USA
An Archaeological Survey of the 40-Mile Chevron West Texas LPG Pipeline Project in Hardin, Liberty, and Chambers Counties, Texas (2007). Prepared for ENSR/AECOM.

West El Paso Lateral Lines Project
Texas, USA
An Archaeological Survey of the West El Paso Lateral Expansion Lines 2034 & 2058 Loop Project, El Paso County, Texas (2006). Prepared for El Paso Corporation.

PROJECT EXPERIENCE – OIL & GAS

Pad 10 Pipeline
North Dakota, USA
Class III Cultural Resource Survey: Pad 10, Mountrail County, ND (2017). Prepared for Andeavor Logistics LP.

Siembra 3-D Seismic Project
Texas, USA
Archaeological Avoidance Plan for the proposed Samson - Siembra 3-D Seismic Project in Fort Bend and Brazoria Counties, Texas (2007). Prepared for Samson Lone Star, LLC.

Hidalgo County Well Location Projects
Texas, USA
Cultural Resources Survey of the Samson Lone Star, LLC Hidalgo County Well Locations in Hidalgo County, Texas (2007). Prepared for Samson Lone Star, LLC.

PROJECT EXPERIENCE – POWER

Site C
British Columbia, Canada
Phase II and Phase III excavations (testing and mitigation) for the BC Hydro Site C Clean Energy Project, a dam to be constructed across the Peace River. Excavated Sites HaRf-71 and HbRf-65 (2014).

SaskPower Substation and Transmission Line under Permit 13-165
Saskatchewan, Canada
SaskPower Kisbey Substation and 230kV Transmission Line East of Stoughton, Saskatchewan (2013).

Southern California Edison's EITP
Nevada - California, USA
The Eldorado-Ivanpah Transmission Project involved the installation of 71 miles of electrical transmission lines that crossed both BLM and private lands, a new 220/115 kV substation, associated telecommunications infrastructure, and system upgrades to ensure reliability (2012).

Pomeroy Wind Farm Project
Iowa, USA
Cultural Resources Literature Review for the Pomeroy Wind Farm Project, Calhoun and Pocahontas Counties, Iowa (2010). Prepared for Pomeroy Wind Farm, LLC.

Tri-County Electric Cooperative Construction Projects
Minnesota, USA
Phase IA Archaeological Survey for the Tri-County Electric Cooperative Construction Projects, Fillmore, Houston and Winona Counties, Minnesota (2009). Prepared for Tri-County Electric Cooperative.

Nobles County Wind Farm Project
Minnesota, USA
Phase I Archaeological Survey or the Nobles County Wind Farm, Nobles County, Minnesota (2009). Prepared for WSB & Associates.

Sherbino Mesa II Wind Farm Project
Texas , USA

A Cultural Resources Survey of the Sherbino Mesa II Wind Farm Project, Pecos County, Texas (2009). Prepared for BP Wind Energy NA.

Nine Anemometer Locations for the White Hills Project
Arizona, USA
An Intensive Cultural Resources Survey of nine Anemometer Tower Locations for the White Hills Project in Mohave County, Arizona (2008). Prepared for BP Alternative Energy.

KS Flat Ridge Wind Farm Project
Kansas, USA
A Cultural Resources Survey of the KS Flat Ridge Wind Farm, Barber County, Kansas (2008). Prepared or BP Alternative Energy.

Five Anemometer Locations for the Arizona Prospect I Project
Arizona, USA
An Intensive Cultural Resources Survey of Five Anemometer Tower Locations for the Arizona Prospect I Project in Navajo County, Arizona (2008). Prepared for Horizon Wind Energy.

Buffalo Gap 3 Wind Farm Project
Texas, USA
A Cultural Resources Survey of the Buffalo Gap 3 Wind Farm on the Callahan Divide, Nolan and Taylor Counties, Texas (2007). Prepared for Buffalo Gap Wind Farm 3, LLC. and AES Seawest, Inc.

Sherbino Mesa Wind Farm Project
Texas, USA
A Cultural Resources Survey of the Sherbino Mesa Wind Farm, Pecos County, Texas (2007). Prepared for Orion Energy, LLC.

Barney M. David Plant
Texas, USA
An Archaeological Survey of the Barney M. David Plant, Nueces County, Texas (2006). Prepared for The WCM Group, Inc.

Nueces Bay Power Plant
Texas, USA
An Archaeological Survey of the Nueces Bay Power Plant, Nueces County, Texas (2006). Prepared for The WCM Group, Inc.

Basalt Canyon Geothermal Exploration Project
California, USA
Cultural Resources Survey for Mammoth Pacific, L.P.'s Basalt Canyon Geothermal Exploration Project, in the Long Valley Known Geothermal Resource Area, Federal Geothermal Leases CA-11667 and CA-14408 in Mono County, California (2001). Prepared for the Inyo National Forest, Bishop, California and Environmental Management Associates, Inc., Brea, California.

PROJECT EXPERIENCE – TRANSPORTATION

Chandler Road Project
Texas, USA
An Intensive Cultural Resources Survey of the Chandler Road, Phase IIIA Roadway Project in Williamson County, Texas (2007). Prepared for Williamson County.

FM 92
Texas, USA
Archaeological Survey for the Proposed FM 92 Realignment Project, Tyler County, Texas (2007). Prepared for Texas Department of Transportation.

State Route 3
California, USA
Archaeological Survey Report for CA-TRI-1403 in State Route 3 at Hayfork Creek, Trinity County, California (2001). Prepared for the California Department of Transportation North Region in Redding, California.

PROJECT EXPERIENCE – LAND DEVELOPMENT

Blackburn Bridge Road
North Carolina, USA
Phase 1 Archaeological Survey; Blackburn Bridge Road Sites, Catawba County, North Carolina (2016). Submitted to Erler & Kalinowski, Inc.

Sites 1 and 2
Iowa, USA
Phase 1A Cultural Resource Reconnaissance Survey; Sites 1 and 2, Dallas County, Iowa (2016). Submitted to Erler & Kalinowski, Inc.

INEOS Nitriles Facility
Texas, USA
Archaeological Survey: Cultural/Archaeological Resource Assessment og Areas 1, 2, 3, and 4 at the INEOS Nitriles Facility in Port Lavaca, Calhoun County, Texas (2016). Prepared for INEOS Nitriles USA LLC.

Estevan Residential Subdivision under Permit No. 13-149
Saskatchewan, Canada
Heritage Resources Impact Assessment of the Estevan Residential Subdivision SW 14-2-8 W2M in Estevan, Saskatchewan (2013).

Lisbon Plant Project
Illinois, USA
Cultural Resources Fatal Flaw Analysis for the Lisbon Plant Project, Kendall County, Illinois (2009). Prepared for RW Beck, Inc.

Rice Creek North Regional Trail Project
Minnesota, USA
Phase I Archaeological Survey for the Rice Creek North Regional Trail Project, Circle Lake and Lino Pines, Anoka County, Minnesota (2009). Prepared for SRF Consulting Group.

Proposed New Comal ISD Elementary School
Texas, USA
Cultural Resources Survey of the Proposed New Comal ISD Elementary School, Bexar County, Texas (2007). Prepared for the Comal Independent School District.

League City Towne Center Project
Texas, USA
An Archaeological Survey of the League City Towne Center, Galveston County, Texas (2006). Prepared for DCH Environmental Consultants, LP.

Avalon Subdivision Project
Texas, USA
Cultural Resources Survey of the Avalon Subdivision, Bexar County, Texas (2006). Prepared for Woodside Homes of South Texas.

Village of Fort Sumner's Proposed Dairy Site
New Mexico, USA
Cultural Resource Survey for the Village of Fort Sumner's Proposed Dairy on State lands, T3N, R26E, Section 36, De Baca County, New Mexico (2001). Report submitted to the Village of Fort Sumner.

PROJECT EXPERIENCE – VOLUNTEER EXPERIENCE

Old San Juan Historic Excavation
Puerto Rico, USA
Observer, assisted the field director on interpretation of a cistern feature being unearthed on the south side of Bulevar del Valle between El Morro and San Cristobal Fortresses (2016).

BLM Volunteer Archaeologist, Farmington District
New Mexico, USA
Surveyed areas, mapped sites, and executed site patrols in the Dinetah and San Juan Basin of the Rio Arriba, San Juan, and Sandoval Counties, New Mexico under the supervision of Mr, James Copeland, BLM Archaeologist (1998).

Eastern New Mexico University Volunteer Archaeologist
New Mexico, USA
Volunteer for the Rio Bonito Archaeological Project, Eastern New Mexico University's Field School (1995). Excavated and surveyed at Fort Stanton, New Mexico.

University of Arizona's Laboratory of Tree-Ring Research Volunteer
New Mexico, USA
Part of the Frijoles Canyon Flood Coring Project in Bandelier National Monument, New Mexico (1992). Cored different species of living trees within the Frijoles Canyon constricted flood plain.

University of Miami Volunteer Underwater Archaeologist and Geoarchaeologist

Florida, USA
National Geographic Society sponsored "Deep Core" Project at Little Salt Spring, North Port, Florida, and at the University of Miami's Geology Laboratory, Coral Gables, Florida (1990).

Archaeological and Historical Conservancy, Inc. Volunteer Archaeologist
Florida, USA
Part of the excavation crew at the Joe Robbie Stadium Project, Miami,, Florida (1988).

TRAINING

HAZWOPER 40-Hour Training Course
Lindberg Compliance Services Group, LLC, 03/16/2018

FRA 214 Railroad Workspace Safety
CN - On-Track Safety - Contractor, 03/15/2018

MSHA - Annual Refresher (8 Hour Course) - Part 46
TriMedia Environmental and Engineering, 02/13/2018

Bloodborne Pathogens
American Red Cross, March 2017

Adult First Aid/CPR/AED
American Red Cross, March 2017

NEPA Compliance and Cultural Resources
National Preservation Institute, 2017

NAGPRA and ARPA: Applications and Requirements
National Preservation Institute, 2016

TWIC
Transportation Worker Identification Credential, 2016

e-RAILSAFE
e-RAILSAFE, 01/09/2014

Section 106: Principles and Practice a continuing education workshop
SRI Foundation in Salt Lake City, UT by Dr. Lynne Sebastian, RPA , December 11-12, 2013

Environmental Compliance Training for FCC Licensees and Consultants
Federal Communications Commission, 05/14/ 2013

H2S Awareness
North Dakota Safety Council, Inc., 02/19/2013

Project Client Relationships

Golder Associates Inc., 02/13/2013

Golder 101
Golder Associates Inc., 02/12/2013

OSHA - General Industry (10 Hour Course)
North Dakota Safety Council, Inc., 01/18/2013

Unexploded Ordinance Training Courses
Department of Defence (Fort Irwin, CA, Fort Stewart Military Reservation, GA, and Kirtland Air Force Base, NM), 2012, 2002-2005

Anti-Harassment Training Course
Environmental Resources Management, 2007

Health, Safety & Training Course
Environmental Resources Management, 2006

Project Safety Training Course
Burlington Northern Santa Fe Railway, 2006

Project Management Bootcamp I, 12 Professional Development Hours
PSMJ Resources, Inc., 2006

SUPPLEMENTAL SKILLS

Report Production
Aided and contributed to the production of the 1988 and 1991 Rio Bonito Archaeological Project Reports (1991-1994).

Statistical Research
Helped anthropology faculty with statistical research of data sets (1992)

Teaching
Taught and assisted university professors in undergraduate and graduate anthropology, lithic, geography, soil erosion and photography courses (1989-1993).

Education

Master of Arts
Anthropology, University of Wyoming, Laramie, Wyoming, 2012

Bachelors of Science
Anthropology, Michigan State University, East Lansing, Michigan, 2008

Certifications

Archaeologist Qualified to Work within the Boundaries of a Human Burial Site and Excavate Human Burials in Wisconsin,
June 12, 2017

Golder Associates Inc. – Green Bay

Cultural Resource Scientist
Chris has 10 years of experience in cultural resource management conducting and supervising pedestrian surveys, recording archaeological sites, intensive data recovery excavations, and managing projects in North Dakota, South Dakota, Minnesota, Wisconsin, Iowa, Indiana, Illinois, Montana, Wyoming, North Carolina, Alabama, and Croatia. He has worked on a variety of projects including energy exploration, oil and gas transmission, mining, telecommunication, electric transmission, transportation, and wetland mitigations. Routine job responsibilities include preparing inventory reports, proposals, compiling site forms, conducting field investigations, and historical research. Chris also has participated in numerous Native American consultation projects with the Mandan, Hidatsa, Arikara, Assiniboine, Chippewa, and Sioux Tribes.

Employment History

Golder Associates Inc. – Green Bay, WI
Cultural Resource Scientist (2016 to Present)

Major responsibilities include assisting clients with NEPA and NHPA compliance as well as local and state regulations; directing archaeological surveys; preparing reports, proposals, and site forms.

Ethnoscience Inc. – Billings, Montana
Field Director (2013 to 2016)

Served as a project lead and field supervisor for Department of Transportation surveys, large scale mitigations associated with energy development, transmission, pipeline, and telecommunication projects. Responsibilities included preparing reports, site forms, proposals, and assisting with project map preparation.

KLJ Solutions – Bismarck, North Dakota
Crew Chief (2012 to 2013)

Responsibilities included supervising field technicians in archaeological investigations for energy development, transportation, geophysical, and telecommunication projects. Assisted in report preparation, site forms, preparing project maps, and conducting file searches at the North Dakota State Historic Preservation Office.

Office of the Wyoming State Archaeologist – Laramie, Wyoming
Field Technician (2011 to 2011)

Was part of a team of archaeologists that conducted a phase III data recovery of a Paleoindian and Archaic site in Teton County for a transportation project. Was responsible for preparing level forms, unit summary reports, and cataloging artifacts.

University of Wyoming, Department of Anthropology – Laramie, Wyoming
Teaching Assistant (2011 to 2011)

Employed as a teaching assistant for a Forensic Anthropology course. Responsibilities included preparing lab stations, helping with lectures, maintaining office hours, and preparing osteological and funerary collections for repatriation.

University of Wyoming, Department of Anthropology – Laramie, Wyoming
Teaching Assistant (2010 to 2010)

Was employed as a teaching assistant for a Research Methods in Anthropology course. Responsibilities included preparing lectures, teaching laboratory sections, and holding office hours.

University of Wyoming, Department of Anthropology – Laramie, Wyoming
Research Assistant (2009 to 2009)

Responsibilities included analyzing, cleaning, organizing, and cataloging artifacts for curation at the University of Wyoming Archaeological Repository.

Environment and Archaeology, LLC – Pittsfield, Illinois
Field Technician (2008 to 2008)

Part of a team of archaeologists that conducted a phase III investigation for the Rex East pipeline. Responsibilities included excavating 2x2 meter units, maintaining level forms, unit summary forms, and sorting and collecting artifacts.

PROJECT EXPERIENCE – RAILWAYS

Direct and Visual Impact Assessment for Communication Tower TWR.DUB.MENOMINEE.16532 Jo Daviess County, Illinois, USA	Conducted a direct and 3/4-mile visual area of potential effects assessment for a 325-foot base station tower in Jo Daviess County, Illinois (2018). Five shovel tests were excavated within the direct APE and no cultural materials were recovered.
Direct and Visual Impact Assessment for Communication Tower TWR.FOX.GREENBAY.00133 Brown County, Wisconsin , USA	Conducted a direct and half-mile visual area of potential effects assessment for a 185-foot PTC base tower within the CN Green Bay railroad yard in Brown County, Wisconsin (2017). Four historic properties were assessed for visual impacts.
Direct and Visual Impact Assessment of Communication Tower TWR.WAT.FORTDODGE.37496 Webster County, Iowa, USA	Conducted a direct and 3/4-mile visual area of potential effects assessment for a 275-foot base station tower within the CN Fort Dodge railroad yard in Webster County, Iowa (2017). A total of 34 historic properties were assessed for visual impacts.
Direct and Visual Impact Assessment for Communication Tower TWR.WAT.NEESE.32028 Hardin County, Iowa, USA	Conducted a direct and half-mile visual area of potential effects assessment for a 185-foot PTC base station tower within the CN right-of-way in Hardin County, Iowa (2017). Five shovel tests were excavated within the direct APE and no cultural materials were recovered.
Direct and Visual Impact Assessment of Communication Tower TWR.WAT.DEBENETTI.33272 Hardin County, Iowa, USA	Conducted a direct and 3/4-mile visual area of potential effects assessment of a 255-foot PTC base tower within the CN right-of-way in Hardin County, Iowa (2017). Five shovel tests were excavated within the direct APE and no cultural materials were recovered.
Direct and Visual Impact Assessment of Communication Tower TWR.WAT.WATERLOO.27591 Black Hawk County, Iowa, USA	Conducted a direct and 3/4-mile visual area of potential effects assessment of a 230-foot PTC base station tower within the CN Waterloo railroad yard in Black Hawk County, Iowa (2017). Nine NRHP listed historic properties were assessed for visual impacts.

Direct and Visual Impact Assessment of Communication Tower TWR.WEBSTERCITY.35542 Hamilton County, Iowa, USA	Conducted a direct and 3/4-mile visual area of potential effects assessment for a 255-foot PTC base station tower within the CN right-of-way in Hamilton County, Iowa (2017). Two NRHP listed properties were assessed for visual impacts.
Direct and Visual Impact Assessment of Communication Tower TWR.DUB.DORIS.24829 Buchanan County, Iowa, USA	Conducted a direct and 3/4-mile visual area of potential effects assessment of a 245-foot PTC base station tower within the CN right-of-way in Buchanan County, Iowa (2017). Five shovel tests were excavated within the direct APE and no cultural materials were recovered.
Direct and Visual Impact Assessment of Communication Tower TWR.WAT.BLAIRSBURG.3407 Hamilton County, Iowa, USA	Conducted a direct and half-mile visual area of potential effects assessment for a 185-foot base station tower in Hamilton County, Iowa (2017). One NRHP listed property was assessed for visual impacts.
Direct and Visual Impact Assessment of Communication Tower TWR.WAT.BESPOKE.28879 Black Hawk County, Iowa, USA	Conducted a direct and 3/4-mile visual area of potential effects assessment of a 305-foot PTC base tower within the CN right-of-way in Black Hawk County, Iowa (2017). Five shovel tests were excavated within the direct APE and no cultural materials were recovered.
Direct and Visual Impact Assessment for Communication Tower TWR.WAT.APLINGTON.30596 Butler County, Iowa, USA	Conducted a direct and 3/4-mile visual area of potential effects assessment for a 350-foot PTC base tower adjacent to the CN right-of-way in Butler County, Iowa (2017). Two historic properties were assessed for visual impacts.
Direct and Visual Impact Assessment of Communication Tower BENYD.BS Cook County, Illinois, USA	Conducted a direct and 1/4-mile visual area of potential effects for a 90-foot PTC tower within the CP Bensenville railroad yard in Cook County, Illinois. No cultural resources were located with the Direct or Visual APE.
Direct and Visual Impact Assessment for Communication Tower ELLA2460.BS Ransom County, North Dakota, USA	Conducted a direct and half-mile visual are of potential effects assessment for a 200-foot PTC base station tower in the CP Enderlin railroad yard in Ransom County, North Dakota (2017). Two historic properties were assessed for visual impacts.

Direct and Visual Impact Assessment for Communication Tower TWR.SBD.KINGSBURY
La Porte County, Indiana, USA

Conducted a direct and half-mile visual area of potential effects assessment for a 180-foot PTC base tower within the CN right-of-way in La Porte County, Indiana (2016). Six historic properties were assessed for visual impacts.

Direct and Visual Impact Assessment for Communication Tower CM08500.CTC
Milwaukee County, Wisconsin, USA

Conducted a direct and 1/4 mile visual area of potential effects assessment for an 80-foot tilt tower within the Canadian Pacific railroad right-of-way in Milwaukee County, Wisconsin (2016). Two historic properties and four historic districts listed in the NRHP were assessed for visual impacts.

Direct and Visual Impact Assessment for SPYD01100.PTUT
Ramsey County, Minnesota, USA

Conducted a direct and 1/4 mile visual area of potential effects assessment for a 160-foot PT UT monopole antenna within the Canadian Pacific railroad right-of-way in Ramsey County, Minnesota (2016).

Direct and Visual Impact Assessment for TWR.MIS.BIRCH.03550
St. Louis County, Minnesota, USA

Conducted a direct and 3/4 mile visual area of potential effects assessment for a 200-foot lattice Positive Train Control (PTC) tower within the Canadian National railroad right-of-way in St. Louis County, Minnesota (2016).

Direct and Visual Impact Assessment for TWR.RNY.ASHLAKE.12850
St. Louis County, Minnesota, USA

Conducted a direct and 3/4 mile visual area of potential effects assessment for a 385-foot lattice Positive Train Control (PTC) tower within the Canadian National railroad right-of-way in St. Louis County, Minnesota (2016), A total of five negative shovel tests were excavated within the direct APE.

Direct and Visual Impact Assessment for TWR,RNY.RAY.14850
Koochiching County, Minnesota, USA

Conducted a direct and 3/4 mile visual area of potential effects assessment for a 200-foot lattice Positive Train Control (PTC) tower within the Canadian National railroad right-of-way in Koochiching County, Minnesota (2016).

Direct and Visual Impact Assessment for TWR.MIS.PROCTOR.00850
St. Louis County, Minnesota, USA

Conducted a direct and 3/4-mile visual area of potential effects assessment for a 280-foot lattice Positive Train Control (PTC) tower within the Canadian National Proctor railroad yard in St. Louis County, Minnesota (2016). A total of five negative shovel tests were excavated within the direct APE and the Proctor railroad yard was photographically document on behalf of the Minnesota SHPO.

Direct and Visual Impact Assessment for TWR.BEA.MOBILE.00050
Mobile County, Alabama, USA

Conducted a direct and half-mile visual area of potential effects assessment for a 150-foot lattice Positive Train Control (PTC) tower within the Canadian National Mobile railroad yard in Mobile County, Alabama (2016). Visual impacts were assessed for one listed NRHP property.

PROJECT EXPERIENCE – WATER RESOURCES

North Dakota Department of Transportation Wetland Mitigation near Goodrich
Sheridan County, North Dakota, USA

A Class III cultural resource inventory of 200 acres and limited subsurface testing for a proposed wetland mitigation. Prepared for the North Dakota Department of Transportation (2016). One historic farmstead was recorded during the investigation.

Dry-Water Regional Water Authority of Richland County
Richland County, Montana, USA

A Class III cultural resource inventory of four utility crossings for the Richland County water/sewer extension project south of Sidney, Montana. Prepared for Interstate Engineering (2013). Three laterals of the Yellowstone Irrigation project were updated.

Shiloh Wetland Mitigation
Burleigh County, North Dakota, USA

A Class III cultural resource inventory of proposed wetland improvements on Shiloh High School lands. Prepared for the North Dakota State Historic Preservation Office (2012).

PROJECT EXPERIENCE – PIPELINES

Oasis Helix Lite Cultural Resource Monitoring
Mountrail County, North Dakota, USA

Monitored construction activities near prehistoric stone feature sites 32MN1107, 32MN1109, 32MN1107, 32MN1300, 32MN1441, and 32MN1442 in Mountrail County, North Dakota for Andeavor Logistics (2018).

Parshall Gathering System - Hoff to Ehlert Station
Mountrail County, North Dakota, USA

Conducted a Class III cultural resource investigation of a 2.8-mile long pipeline corridor totaling 67.88 acres on behalf of True Companies. The site boundary of site lead 32MNx0042 was updated as part of the investigation (2017).

Parshall Gathering System - Ehlert to Stanley Station
Mountrail County, North Dakota, USA

Conducted a Class III cultural resource investigation of 23.4-mile long pipeline corridor totaling 568.49 acres in Mountrail County, North Dakota on behalf of True Companies. One isolated find (32MNx0839), one historical site (32MN0726), one architectural site (32MN0733), and one prehistoric stone feature site (32MN0726) were updated. A previously undocumented prehistoric stone feature site (32MN1424) was recorded as part of the survey (2017).

Oasis Loop Pipeline
Mountrail County, North Dakota, USA

Conducted a Class III cultural resource investigation of 16.6-mile long pipeline corridor totaling 403.85 acres in Mountrail County, North Dakota for Tesoro Logistics. Three prehistoric stone feature sites, a prehistoric isolated find, and two historic agricultural sites were recorded within the project corridor (2017).

BakkenLink Integration - Oasis to Dry Creek Pipeline Construction Monitoring
McKenzie County, North Dakota, USA

Monitored pipeline construction activities, topsoil removal, and trenching of a one mile pipeline segment near sites 32MZ793, 32MZ3091, and 32MZ3092 in McKenzie County, North Dakota for Tesoro Logistics (2016).

Hidden Bench Phase 2 Gathering System
McKenzie County, North Dakota, USA

A class III cultural resource inventory of an 18.55 mile linear corridor of a proposed crude oil pipeline for Tesoro Logistics (2016). A total of 449.6 acres were surveyed and one historic farmstead (32MZ3089) was recorded and the WAPA transmission line (32MZ1561) was updated.

Construction monitoring of the West Spur of the Vantage Pipeline
Divide and Burke Counties, North Dakota, USA

Monitored pipeline construction activities, topsoil removal, and pot holing near several prehistoric stone feature sites in Divide and Burke Counties, North Dakota for Pembina Pipeline Corporation (2015).

West Spur of the Vantage Pipeline
Williams, Divide, and Burke Counties, North Dakota, USA

A Class III cultural resource inventory of approximately 60 miles of a linear corridor of a proposed ethane pipeline in northwestern North Dakota. Prepared for Vantage and Pembina Pipeline Corporation (2015).

Keystone XL Project
Fallon County, Montana, USA

A cultural resources survey of an ancillary facility for the Montana segment of the Keystone XL project in southeastern Montana. The project was conducted on behalf of EXP Energy (2014).

PROJECT EXPERIENCE – ARCHAEOLOGY

Cultural Resource Monitoring of a Natural Gas and Electrical Service Installation
Winnebago County, Wisconsin, USA

Monitored a natural gas and electrical service installation at a residential service address for Wisconsin Public Service. Monitoring occurred within the boundaries of uncatalogued burial site BWN-0140 in Winnebago County, Wisconsin (2018).

Cultural Resource Monitoring of an Electrical Upgrades
Waupaca County, Wisconsin, USA

Monitored an electrical line installation within the South Park recreation area for Wisconsin Public Service. Monitoring occurred within the boundaries of site WP-0107 in Waupaca County, Wisconsin (2018).

Cultural Resource Monitoring of a Natural Gas Service and Meter Installation
Oconto County, Wisconsin, USA

Monitored a natural gas service and meter installation at one service address for Wisconsin Public Service. Monitoring occurred within the boundaries of uncatalogued burial site BOC-0048 in Oconto County, Wisconsin (2017).

Cultural Resource Monitoring for a 25-Year Natural Gas Service and Meter Replacement Project
Winnebago County, Wisconsin, USA

Monitored natural gas service upgrades and meter replacement projects at five service address for Wisconsin Public Service. Monitoring occurred within the boundaries of uncatalogued burial sites BWN-0184, BWN-0191, BWN-0159, and BWN-0106 in Winnebago County, Wisconsin (2017).

Phase I Cultural Resource Investigations for EKI
Dallas County, Iowa, USA

Conducted an archaeological investigation of a proposed commercial development on behalf of EKI in Dallas County, Iowa. A total of 1,268 acres were investigated and two historic farmsteads (25-01768 and 25-01769) were recorded

Archaeological Investigation of Mortuary features in northeastern South Dakota
Brown, Edmunds, Faulk, and McPherson Counties, South Dakota, USA

Conducted an archaeological investigation of prehistoric and historic mortuary features of four counties in South Dakota. Site types ranged from prehistoric burial mounds, cairns, and other stone features, homestead graves, and undocumented historic cemeteries. Prepared for the South Dakota State Historic Preservation Office (2015).

Paramount Bike Trail and Interpretative Area
Dawson County, Montana, USA

A Class III cultural resource survey of the Paramount Bike Trail and Interpretative Area in Makoshika State Park. Prepared for the Montana State Parks (2013).

Central Dakota Humane Society Shelter Relocation
Burleigh County, North Dakota, USA

A Class III cultural resource survey of 10 acres for the Central Dakota Humane Society shelter relocation project in Bismarck, North Dakota. Prepared for the North Dakota State Historic Preservation Office (2012.)

PROJECT EXPERIENCE – ELECTRIC POWER TRANSMISSION

Direct and Visual Impact Assessment of the Western Substation Tower Site
Winnebago County, Wisconsin, USA

Conducted a direct and half-mile visual impact assessment for a 78-foot monopole tower in an electrical substation for WE Energies. A total of 27 historic properties were assessed for potential visual impacts (2017).

Direct and Visual Impact Assessment of the Elkhart Lake Substation Tower Site
Sheboygan County, Wisconsin, USA

Conducted a direct and half-mile visual impact assessment for a 95-foot monopole tower in an electrical substation for WE Energies. A total of 12 cultural resources were assessed for potential visual impacts (2017).

GoldenWest Electric Cooperative
Dawson and Wibaux Counties, Montana, USA

A Class III cultural resource inventory of a proposed power line extension and electric pole yard expansion. Prepared for Goldenwest Electric cooperative and the Bureau of Land Management (2015).

NorVal Electric Cooperative, Inc.
Valley County, Montana, USA

A Class III cultural resource inventory of 55 miles of the Black Coulee transmission line. Prepared for Heberly and Associates, NorVal Electric Cooperative, Inc. and the Bureau of Land Management (2013).

Hill County Electric Cooperative Landford Project
Blaine County, Montana, USA

A Class III cultural resource inventory of a distribution line installation. Prepared for Heberly and Associates and the State of Montana (2013).

Hill County Electric Cooperative Lankford-Hoefeldt Project
Blaine County, Montana, USA

A Class III cultural resource inventory of an eight mile distribution line upgrade. Prepared for Heberly and Associates and the State of Montana (2013).

PROJECT EXPERIENCE – TELECOMMUNICATION

Nemont Telephone Cooperative, Inc.
Valley and Phillips County, Montana, USA

A Class III cultural resource inventory of 48.5 miles of selected tracts of public lands, totalling 594.01 acres. Prepared for Finley Engineering, the Bureau of Land Management, State of Montana, and Montana Fish, Wildlife and Parks (2014). Seven previously recorded sites were updated and 14 undocumented sites (were recorded

AT&T Rapids MTL02708-LTE Cellular Communication Modifications
Stillwater County, Montana, USA

A Class I visual impact assessment and Class III cultural resource analysis for the AT&T Rapids MTL02708-LTE cellular tower. Prepared for Terracon and the FCC (2014). The Union Pacific Railroad along I-90 and Big Ditch irrigation canal.

AT&T Montana Brewing Company Cellular Collocation
Yellowstone County, Montana, USA

A Class I visual impact assessment and Class III cultural resource inventory for a proposed cellular collocation on top of the Montana Brewing Company building. Prepared for Terracon and the FCC (2014). Two NRHP listed historic districts were assessed for visual impacts.

AT&T Glendive DT
Dawson County, Montana, USA

A Visual Impact Assessment and Class I Analysis for Cellular Communication Modifications. Prepared for Terracon and the FCC (2014). The Farmers Union Grain Terminal Association grain elevator (24DW0563) was recorded, one historic district (24DW0028), and four historic properties (24DW0290, 24DW0229, 24DW0413, and 24DW0418) were assessed for visual impacts.

PROJECT EXPERIENCE – MINING

BNI Coal Monitoring
Oliver County, North Dakota, USA

Monitoring of archaeological sites for the construction of a water retention pond. Prepared for BNI Coal and the Public Service Commission (2016).

Expansion of the East Permit Area for the Falkirk Mining Company
McLean County, North Dakota, USA

A Class III inventory of the east permit extension for the Falkirk Mining Company. The inventory approximately covered 1,300 acres. Three historic farmsteads (32ML1311, 32ML1318, and 32ML1319), one historic material scatter (32ML1312), and one prehistoric Isolated Find (32MLx786) were recorded during the investigation. Prepared for the Public Service Commission and the Bureau of Land Management (2016).

Decker Coal
Big Horn County, Montana, USA

A Class I and Class III cultural resource investigation of the East Decker Mine expansion. Prepared for the Public Service Commission and the State of Montana (2015). One historic farmstead was updated during the investigation.

Coyote Creek Mine Archaeological Mitigation
Mercer County, North Dakota, USA

An intensive Phase III mitigation of sites 32ME2436, 32ME2475, and 32ME2476 for a coal mining permit. Prepared for the Public Service Commission (2015). Six stone circles and a lithic scatter were excavated as part of the mitigation.

Coyote Creek Mine Data Recovery at 32ME2350
Mercer County, North Dakota, USA

An intensive Phase III mitigation of site 32ME2350, a prehistoric Knife River flint lithic procurement area in preparation of the development of several workshops and office buildings for the main office of the Coyote Creek Mine (2014).

Coyote Creek Mine Haul Road
Mercer County, North Dakota, USA

A Class III cultural resource inventory and limited site testing for a haul road corridor. Prepared for the Coyote Creek Mine, North American Coal Corporation, and the Public Service Commission (2014). One stone circle was tested to assess National Register of Historic Places eligibility under Criterion D.

PROJECT EXPERIENCE – TRANSPORTATION

Highway 200: Junction 41 to McClusky
McLean and Sheridan Counties, North Dakota, USA

A Class III cultural resource investigation of State Route 200 from Junction 41 to the town of McClusky for sliver grading and general road improvements. Prepared for the North Dakota Department of Transportation (2016).

Goodrich: Highway 200 from Junction 14 to Junction 3
Sheridan and Wells Counties, North Dakota, USA

Class III cultural resource investigation of State Route 200 from Junction 14 to Junction 3 for sliver grading and general road improvements. Prepared for the North Dakota Department of Transportation (2016).

Interstate 15 Lincoln Interchange Lewis and Clark County, Montana, USA	Class III cultural resource inventory of proposed improvements of the Interstate 15 and Lincoln Road interchange. Prepared for the Montana Department of Transportation (2016).
Rockvale North Gravel Pit and Access Road (CN 407000) Carbon County, Montana, USA	A cultural resource inventory of the proposed Rockvale North gravel pit and access road. Prepared for the Montana Department of Transportation (2015).
Lovell - Emblem, Wyoming 295 Junction North (Project No. 0202014) Big Horn County, Wyoming, USA	Class III cultural resource inventory along Wyoming 32. Prepared for the Wyoming Department of Transportation (2015). A segment of the Bridger Trail was updated during the investigation.
Secondary Highway 327 Roosevelt County, Montana, USA	Class III cultural resource inventory of Secondary Highway 327. Prepared for the Montana Department of Transportation and DOWL HKM (2014). A historic irrigation canal was updated during the inventory.
Eagle Butte Mine Highway 59 Relocation Project (Project No. ARS3814) Campbell County, Wyoming, USA	Class III cultural resource survey of the Eagle Butte Mine Highway 59 relocation project. Prepared for the Wyoming Department of Transportation (2014). Two historic sites were updated and two prehistoric isolated finds were recorded during the inventory.
Lovell - Cowley Road Sage Creek Section (Project No. N345093) Big Horn County, Wyoming, USA	A Class III cultural resource inventory along Wyoming 310. Prepared for the Wyoming Department of Transportation (2015). A historic bridge was recorded and three previously recorded historic period resources were updated.
NDDOT Project 3-020(107)044, North McHenry to South Junction 15 PCN18874 Eddy County, North Dakota, USA	A Class III cultural resource investigation from North McHenry to South Junction 15. Prepared for the North Dakota Department of Transportation (2013).
Williston, North Dakota Historic District Analysis Williams County, North Dakota, USA	A Class III cultural resource inventory and historic district analysis along Main Street from Front Street to Sixth Street. Prepared for the North Dakota Department of Transportation (2013).
ROM-0300(119) PCN 19466 Ward County, North Dakota, USA	A Class I cultural resource investigation for a bituminous overlay in Ward County, North Dakota. Prepared for the North Dakota Department of Transportation (2012).

Highway 85 Expansion, Watford City to County Road 16 Williams and McKenzie Counties, North Dakota, USA	A Class III cultural resource investigation for the expansion of Highway 85 from two to four lanes between Watford City and Williston, North Dakota (2012). A total of 1,781 acres were surveyed and four historic properties and four prehistoric isolated finds were recorded.

TRAINING

NEPA Compliance and Cultural Resources
National Preservation Institute, December 8, 2017

MSHA New Miner Training
Bell Hospital, February 22, 2017

NAGPRA and ARPA: Applications and Requirements
National Preservation Institute, December 9, 2016

CN OTS Certification
CN, August 16, 2016

eRailSafe
eRailSafe, August 15, 2016

OSHA 10 Hour General Safety and Work Hazard Certification
OSHA Training Center, August 11, 2016

CPR, AED and First Aid Certification
Health and Safety Institute, April 14, 2016

H2S Safety Awareness
North Dakota Safety Council, June 12, 2012

Archaeological Field School
Michigan State University and Dickson Mounds Museum, July 2008

PROFESSIONAL AFFILIATIONS

Society for American Archaeology
Wisconsin Archaeological Society
Wyoming Archaeological Society
Montana Archaeology Society

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Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Michael L. Parson, Governor
Carol S. Comer, Director

August 14, 2018

Mr. Scott Tener, P.E.
901 Locust
Kansas City, Missouri 64106

Re: **SHPO Project No.: 007-PL-13** – Kansas City International Airport – Terminal Replacement Project, Platte County, Missouri.

Dear Mr. Tener:

Thank you for submitting information on the above referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.L. 89-665, as amended) and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800, which requires identification and evaluation of cultural resources.

We have reviewed the July 2018 report entitled *Phase I Archaeological Survey Kansas City International Airport Archaeological Services, Platte County, Missouri* by Golder Associates Inc. Based on this review it is evident that a thorough and adequate monitoring of the cultural resources has been conducted of the project area. We concur with the investigator's recommendation that an Unanticipated Discovery Plan should be developed prior to subsurface disturbances commencing for this proposed action. A Monitoring Plan should also be developed prior to the commencement of subsurface disturbance for this project. The Monitoring Plan should outline the areas that will be monitored by a qualified archaeological professional when the disturbance will exceed the depth of fill in areas that are currently obstructed by pavement and structures. We look forward to continuing with consultation on this project.

Please be advised that, should project plans change, information documenting the revisions should be submitted to this office for further review. In the event that cultural materials are encountered during further project activities, all construction should be halted, and this office notified as soon as possible in order to determine the appropriate course of action.

Recycled paper

If you have any questions, please write Amanda Burke at State Historic Preservation Office, P.O. Box 176, Jefferson City, Missouri 65102 or call 573.522.4641. Please be sure to include the SHPO Log Number (**007-PL-13**) on all future correspondence or inquiries relating to this project.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Toni M. Prawl

Toni M. Prawl, Ph.D.
Director and Deputy State
Historic Preservation Officer

TMP:hg

Pawnee Nation of Oklahoma

Tuesday, August 21, 2018

Pat Klein
Aviation Director
Kansas City Missouri Aviation Department
Kansas City International
601 Brasilia Avenue
Kansas City, Missouri 64195-0047

RE: Initiation of Section 106 Consultation and Review for the Kansas City International Airport

Dear *Mr. Klein*,

In accordance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470f), and its implementing regulation, 36 CFR 800, "Protection of Historic Properties," the Pawnee Nation is requesting that the Kansas City International Airport initiate consultation with our Historic Preservation Office on any projects seeking federal permits and/or funding.

Should you have questions, please do not hesitate to contact me at jreed@pawneenation.org. Thank you for your time and consideration.

Sincerely,

Matt Reed
Historic Preservation Officer
Pawnee Nation of Oklahoma

Historic Preservation Office
Matt Reed
Phone: 918.762.2180 Fax: 918.762.3662
E-mail: jreed@pawneenation.org
P.O. Box 470
Pawnee, Oklahoma 74058

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Agenda

- Proposed Action
- Consultation Background
- Potential Impacts
  - Direct APE
  - Indirect APE
- Potential Mitigation Measures
- Next Steps
  - Memorandum of Agreement (MOA)
  - Section 4(f) Statement
  - Environmental Assessment and FAA Environmental Determination

Kansas City International Airport

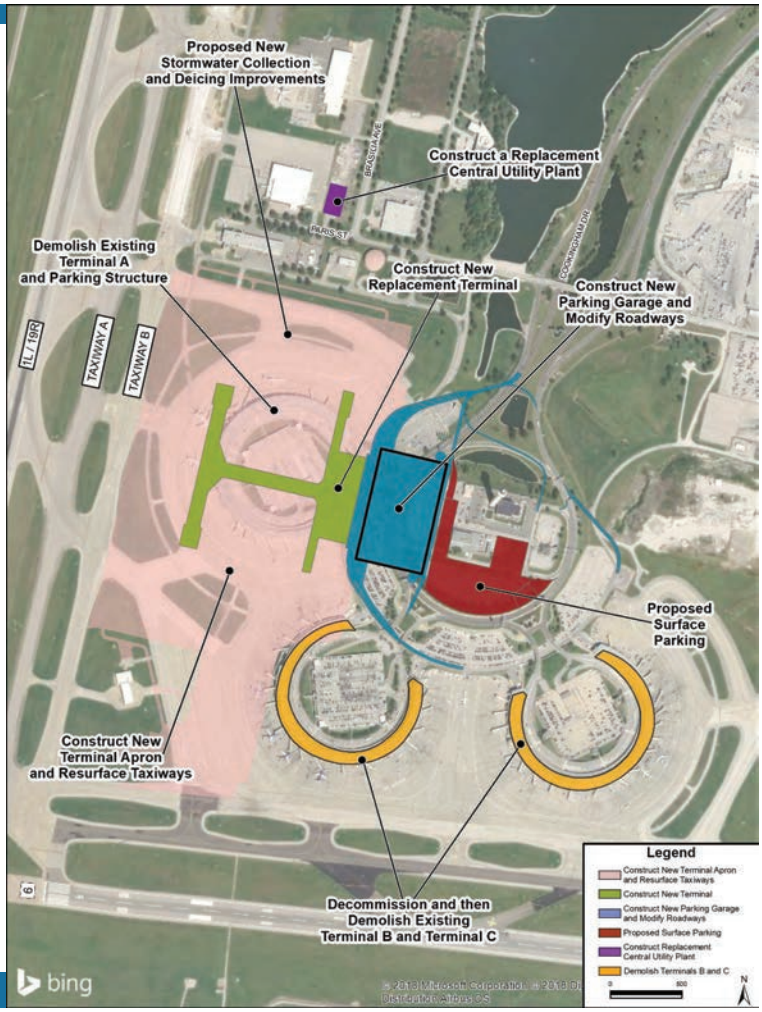
Proposed Terminal Replacement Project Environmental Assessment, Section 106 Evaluation, and Section 4(f) Statement

Consultation Meetings
August 22 and 23, 2018

Consultation Background

- February 6, 2013 letter from FAA to SHPO with initial determination
- February 14, 2013 letter from SHPO to FAA requesting additional information
- June 20, 2013 letter from L&B to SHPO with additional information
- July 16, 2013 letter from SHPO with adverse effect determination
- August 21, 2013 letter from SHPO with expanded determination
- September 5, 2013 email from FAA to SHPO with concurrence of determination of adverse effect
- November 22, 2017 letter from FAA to SHPO formally restarting the Section 106 Consultation Process
- December 19, 2017 letter from SHPO to FAA concurring with Adverse effect finding and requesting Advisory Council on Historic Preservation (ACHP) coordination
- December 27, 2017 letters from FAA to Tribes with invitation to participate in Section 106 Consultation Process/ Re-coordinating the Proposed Action
- January 4, 2018 PowerPoint presentation provided to SHPO at in-person meeting in Jefferson City, MO
- January 12, 2018 ACHP e-106 submittal from FAA to ACHP
- January 30, 2018 letter from ACHP to FAA stating their participation not needed at this time/Request copy of MOA when complete
- January 31, 2018, letter from FAA to SHPO with additional information concerning cut/fill drawings and structures map.
- February 14, 2018 invitation for Agency Scoping Meeting for March 15, 2018 sent to SHPO and Tribes
- March 12, 2018 in-person meeting with Osage Nation initiating Section 106 consultation
- March 12, 2018 letter from SHPO to FAA requesting an archeological survey with deep testing and updating the SHPO Log Number to 007-PL-18
- June 6, 2018 letter from FAA to SHPO and Osage Nation confirming archeological survey methodology
- July 10, 2018 Archeological Survey Report provided to SHPO and Osage Nation for review and comment
- August 14, 2018 letter from SHPO to FAA concurring with the Archeological Survey Report and the recommendation for an unanticipated discovery plan and construction monitoring plan

Proposed Action (Undertaking)



Potential Impacts- Direct APE

The FAA and the SHPO have determined that Terminals A, B, and C are eligible for listing in the National Register of Historic Places under Criteria A and C.

(Adverse Effect)

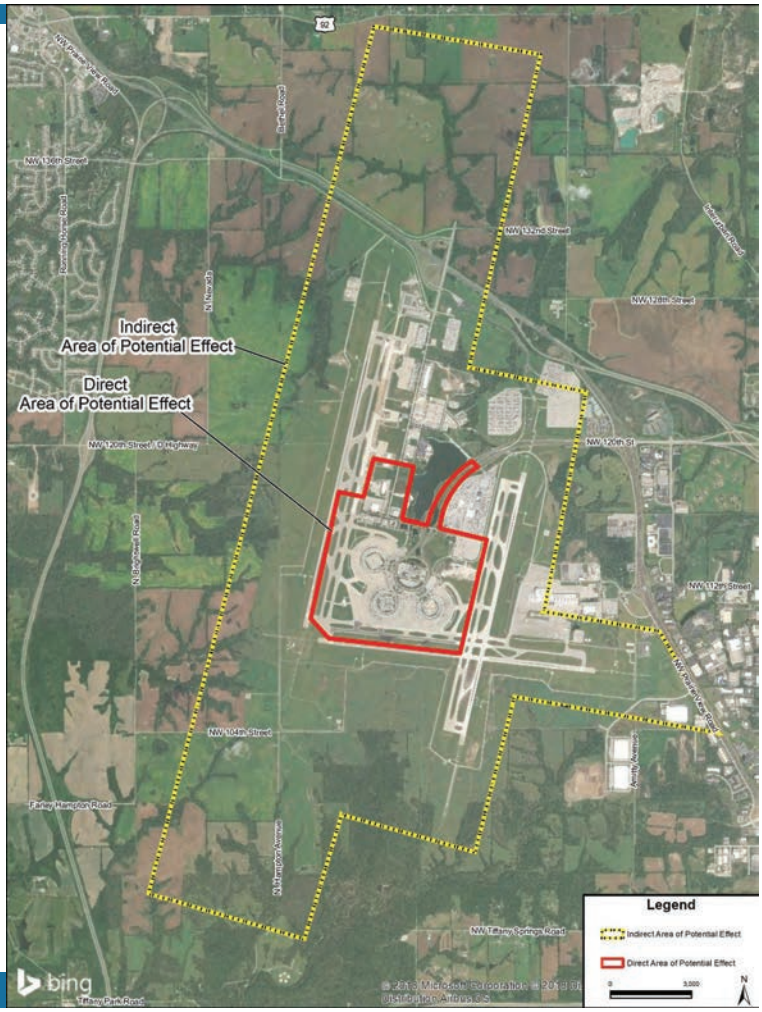






Historical, Architectural, Archeological, and Cultural Resources

Areas of Potential Effects (APE) for Direct and Indirect Impacts

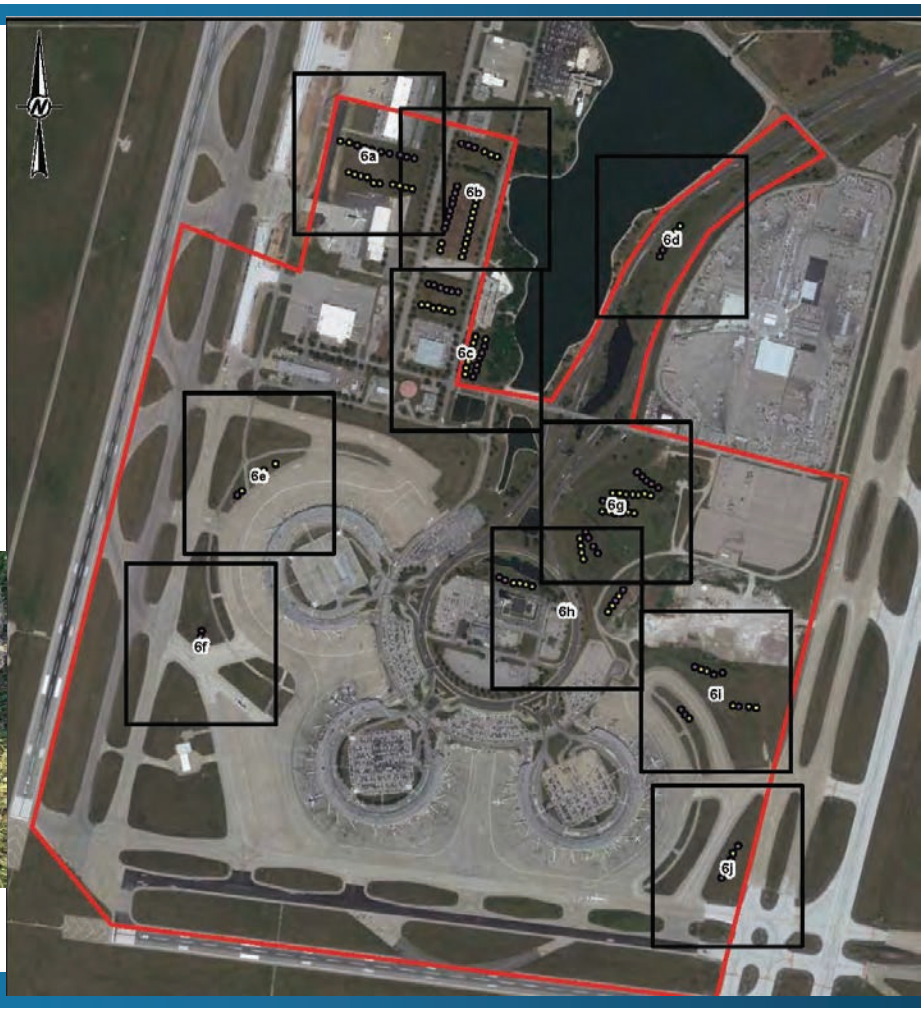


Potential Impacts- Direct APE

149 shovel tests were negative for cultural or archeological resources

(No Effect)

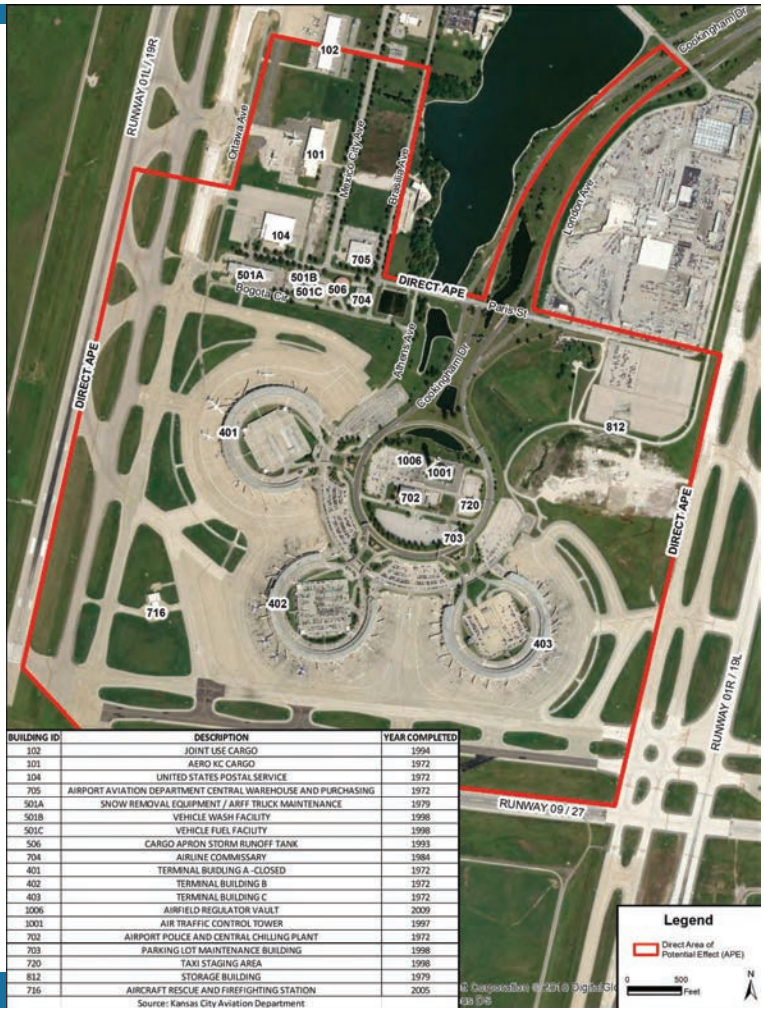




Potential Impacts- Direct APE

No other Historical Buildings/ Structures or Architectural Resources in the Direct APE

(No Effect)



BUILDING ID	DESCRIPTION	YEAR COMPLETED
102	JOINT USE CARGO	1994
101	AERO KC CARGO	1972
104	UNITED STATES POSTAL SERVICE	1972
705	AIRPORT AVIATION DEPARTMENT CENTRAL WAREHOUSE AND PURCHASING	1972
501A	SNOW REMOVAL EQUIPMENT / ARFF TRUCK MAINTENANCE	1979
501B	VEHICLE WASH FACILITY	1998
501C	VEHICLE FUEL FACILITY	1998
506	CARGO APRON STORM RUNOFF TANK	1993
704	AIRLINE COMMISSARY	1984
401	TERMINAL BUIDLING A -CLOSED	1972
402	TERMINAL BUILDING B	1972
403	TERMINAL BUILDING C	1972
1006	AIRFIELD REGULATOR VAULT	2009
1001	AIR TRAFFIC CONTROL TOWER	1997
702	AIRPORT POLICE AND CENTRAL CHILLING PLANT	1972
703	PARKING LOT MAINTENANCE BUILDING	1998
720	TAXI STAGING AREA	1998
812	STORAGE BUILDING	1979
716	AIRCRAFT RESCUE AND FIREFIGHTING STATION	2005

Source: Kansas City Aviation Department

Potential Impacts- Indirect APE

- Three archaeological sites have been identified in the Indirect APE (outside the area of potential ground disturbance).
- There are also known cemeteries in the Indirect APE (outside the area of potential ground disturbance).



Information contained in this exhibit relating to the nature and location of the archeological sites is considered confidential and not for public disclosure in accordance with Section 304 of the National Historic Preservation Act (54 USC § 307103; 36 CFR Part 800.6 (a)(5) of the advisory Council on Historic Preservation's rules implementing Sections 106 and 110 of the Act; and Section 9(a) of the Archeological Resources Protection Act (54 USC §100707).



Potential Impacts- Direct APE

Eight trenches were negative for cultural or archeological resources

(No Effect)





Potential Impacts- Indirect APE

A reconnaissance of the airport perimeter was performed to identify potential areas that may be affected by the Proposed Action



Potential Impacts- Indirect APE



- None of archaeological sites will be directly or indirectly impacted by the Proposed Action.
- None of these known cemeteries sites will be directly or indirectly impacted by the Proposed Action.

Information contained in this exhibit relating to the nature and location of the archeological sites is considered confidential and not for public disclosure in accordance with Section 304 of the National Historic Preservation Act (54 USC § 307103; 36 CFR Part 800.6 (a)(5) of the advisory Council on Historic Preservation's rules implementing Sections 106 and 110 of the Act; and Section 9(a) of the Archeological Resources Protection Act (54 USC §100707).



Traditional Cultural Property

- Scoping comment requested entire Airport be nominated as a Traditional Cultural Property (TCP)
- Based on the nature of the undertaking, it is not necessary to make a determination regarding the eligibility of the Airport as a TCP at this time
- Even assuming that the Airport were eligible as a TCP, the Proposed Action would have no direct physical effect on the TCP

(No Adverse Effect)

Potential Impacts- Indirect APE

Due to the size and shape of the existing terminals, the topography and the vegetation/obstacles in the way, the existing terminals are not visible from these locations. Proposed Action would be similar to existing.

(No Effect)



Site 1



Site 3

Photographs from all the locations are in the Draft EA

Historic and Architectural Proposed Mitigation Measures

- Create Photographic Record of Terminals
  - High-Resolution digital camera, not film
  - In accordance with HABS/HAER photography guidelines
  - Initially 75 black and white archival prints (8x10) of Terminal A would be submitted to SHPO along with CD of all printed images
  - After construction of replacement terminals photographic record would be conducted for Terminal B and C and submitted to SHPO

- Prepare Historical Report for Terminals A, B, and C
  - Comprehensive historical and physical descriptions based on archival research will be submitted to SHPO to provide narrative documentation of all the terminals

- Display large format prints of existing terminals in the new replacement terminal
  - 10-20 images from the photographic record and from historical prints will be selected for display in the new replacement terminal

Proposed Mitigation Measures

- Historic and Architectural Mitigation Measures
  - Measures to address the physical taking of the Terminals

- Archeological and Cultural Mitigation Measures
  - Measures to address unknown resources that may be encountered during construction activities

Next Steps for MOA

- FAA provides Draft MOA to SHPO/Osage Nation– *August 24, 2018*
- SHPO/Osage Nation review MOA and provide comments– *August 24, 2018 to September 7, 2018*
- MOA updated with comments– *September 7, 2018 to September 14, 2018*
- KCAD signs MOA then FAA signs– *September 14, 2018 to September 21, 2018*
- MOA provided to SHPO/Osage Nation for signature– *September 21, 2018*
- KCAD provides photographic record of Terminal A to SHPO– *October 2018*

**Demolition of Terminal A may begin after FAA finding on EA

- KCAD provides historical documentation report to SHPO– *Fall 2018*
- KCAD provides photographic record of Terminal B and C to SHPO- *2022*
- KCAD produces large format prints to be in new terminal - *2022*

Archeological and Cultural Proposed Mitigation Measures

- Prepare Unanticipated Discovery Plan
  - If previously undocumented buried cultural resources are identified by KCAD's contractors during ground-disturbing activities, all work in the immediate vicinity of the discovery would immediately stop and the discovery would be protected. KCAD would notify the FAA and the FAA would notify the SHPO, ACHP, and other concerned parties.

- Archaeologist on-site during certain construction activities
  - KCAD will have a 36 CFR Part 61 qualified independent professional archaeologist present during certain ground disturbing activities.
  - Anticipated when activities are below the original fill depths in the Terminal A area.
  - This is depth of fill material used in the original construction of Terminal A

Next Steps for EA

- Draft EA Available for Public Comment – *August 23, 2018 to October 2, 2018*
- Public Hearing – *September 24, 2018*
- Collect Comments and Prepare Final EA – *October 2018*
- Publish Final EA – *October 2018*
- FAA issues its finding – *Fall 2018*

Next Steps for Section 4(f) Statement

- Draft Section 4(f) Statement Available for Public Comment – *August 30, 2018 to October 1, 2018*
- Collect Comments and Prepare Final – *October 2018*
- Publish Final Section 4(f) Statement with Final EA – *October 2018*

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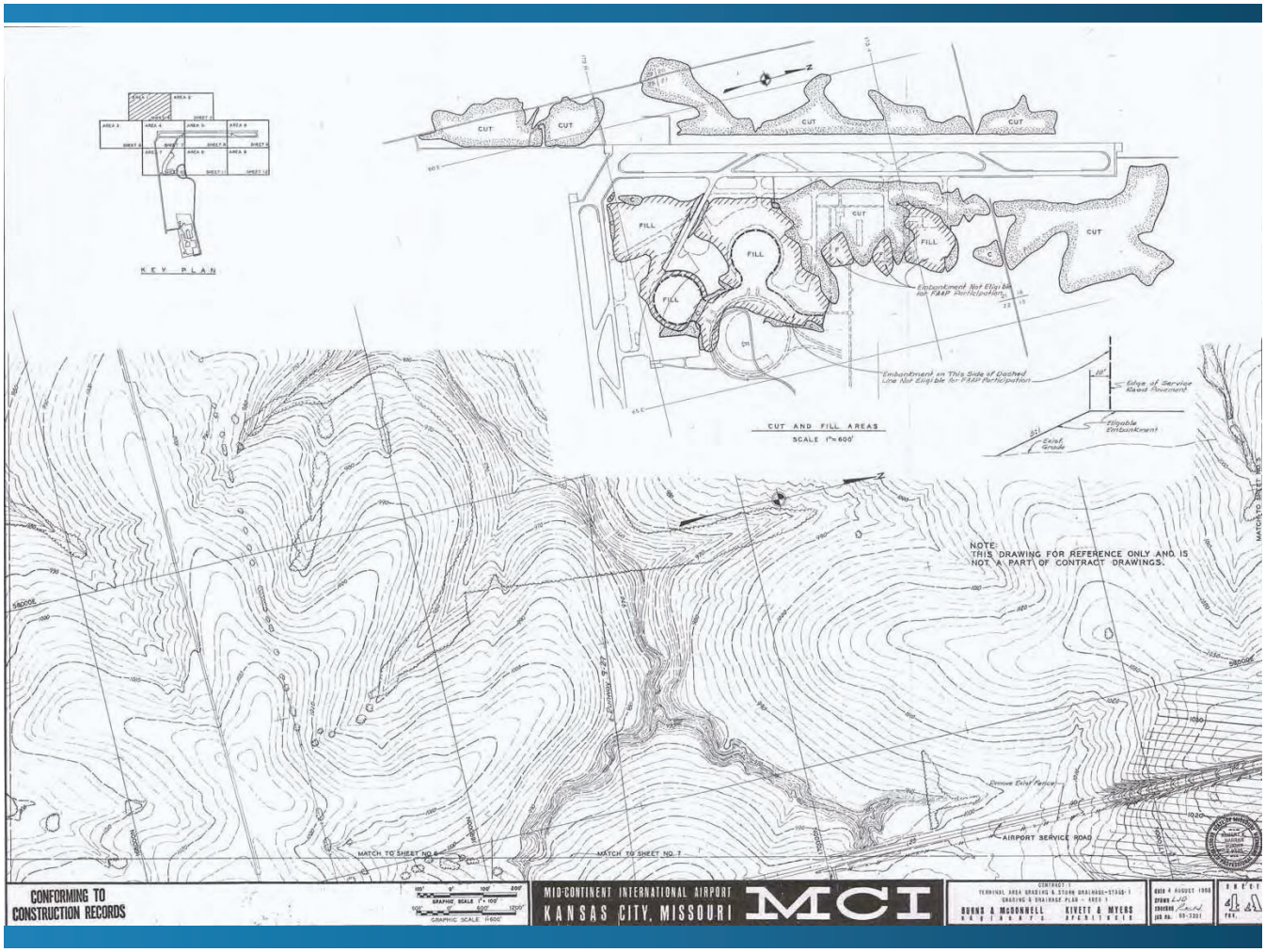

From: scott.tener@faa.gov
To: crystal_douglas@kawnation.com
Cc: Jade.Liska@kcmo.org; Pat.Klein@kcmo.org; Chris Babb
Subject: Response from Kaw Nation: Request for Section 106 Consultation - Terminal Project for Kansas City International Airport
Date: Monday, August 27, 2018 4:57:53 PM

Thank you. Currently our agreement with the SHPO will be in the form of a Programmatic Agreement. We will include you in our agreement for dealing with unanticipated discoveries. If we have any further consultation meetings, we will invite you to participate.

Please let me know if you have any questions,

Scott Tener
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
http://www.faa.gov/airports/central/

From: Crystal Douglas <crystal_douglas@kawnation.com>
Sent: Monday, August 27, 2018 3:38 PM
To: Tener, Scott (FAA) <scott.tener@faa.gov>
Subject: RE: (1 0f 3) Request for Section 106 Consultation, Kaw Nation - Terminal Project for Kansas City International Airport

Scott Tener:
I have reviewed the information you have provided concerning the Terminal Project for the Kansas City International Airport, if you have a separate Consultation with Indian Tribes I would like to be included in this meeting. I have reviewed the material and understand that you are using ground that has previously been disturbed; I also understand that you have contacted the SHPO in Missouri and have conducted a phase 1 Archeological Survey, if you should discover any human remains or cultural activity during excavation please let me know I will make arrangements to come to the site. I will approve the continuation of this project.

Crystal Douglas
Kaw Nation THPO
580-269-2552
crystal_douglas@kawnation.com

From: scott.tener@faa.gov [mailto:scott.tener@faa.gov]
Sent: Monday, August 27, 2018 2:39 PM
To: crystal_douglas@kawnation.com
Subject: (1 0f 3) Request for Section 106 Consultation, Kaw Nation - Terminal Project for Kansas City International Airport

Ms. Douglas,

Please find attached letter outlining the proposed undertaking and efforts to date to determine direct and indirect impacts to historic and cultural resources.

Also attached are:

- Phase I Archeological Survey, July 2018, Golder Associates Inc. **(separate email 2 of 3)**
- Cultural Resource Investigations Phase I Survey, April 2008, ERC, Inc **(separate email 3 of 3)**
- Power Point Presentation given to Missouri SHPO and Osage Nation outlining efforts to date

More information is available in the Draft EA which can be downloaded from this link,
http://www.flykci.com/media/7707/kci-terminal-ea-section-106-review_draft_august-2018.pdf

The Draft EA is currently available for public review and comment. To help in our preparation of the EA, we would appreciate your input (via mail or e-mail) within thirty (30) days. If you have questions or require additional information, please contact me at 816-329-2639 or scott.tener@faa.gov.

Please let me know if you have any questions,

Scott Tener
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
http://www.faa.gov/airports/central/

Pawnee Nation of Oklahoma

Monday, August 27, 2018

Scott Tener, P.E.
Environmental Specialist
Central Region
Federal Aviation Administration
U.S. Department of Transportation
901 Locust
Kansas City, Missouri 64106

RE: Section 106 Coordination Environmental Assessment for Proposed Replacement Terminal Project; Kansas City International Airport; Kansas City, Platte County, Missouri

Dear *Mr. Tener*,

The Pawnee Nation Office of Historic Preservation has received the information and materials requested for our Section 106 Review and Consultation. Consultation with the Pawnee Nation is required by Section 106 of the National Historic Preservation Act of 1966 (NHPA), and 36 CFR Part 800.

Given the information provided, you are hereby notified that the proposal project location should have no potential to adversely affect any known Archaeological, Historical, or Sacred Pawnee sites. Therefore, in accordance with 36 CFR 800.4(d) (1), you may proceed with your proposed project. **However, please be advised that your project lies within close proximity of known archaeological sites and that undiscovered properties may be encountered and must be immediately reported to us under both the NHPA and NAGPRA regulations.**

This information is provided to assist you in complying with 36 CFR Part 800 for Section 106 Consultation procedures. Please retain this correspondence to show compliance. Should you have questions, please do not hesitate to contact me at jreed@pawneenation.org. Thank you for your time and consideration.

Sincerely,

Matt Reed
Historic Preservation Officer
Pawnee Nation of Oklahoma

Historic Preservation Office
Matt Reed
Phone: 918.762.2180 Fax: 918.762.3662
E-mail: jreed@pawneenation.org
P.O. Box 470
Pawnee, Oklahoma 74058

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From: halona.clawson@ponca.com
To: scott.tener@faa.gov
Subject: Re: Request for Section 106 Consultation, Ponca Nation - Terminal Project for Kansas City International Airport
Date: Wednesday, October 17, 2018 11:26:56 AM

Yes :)

Halona Cabe

Tribal Historic Preservation Officer

121 White Eagle Drive

Ponca City, OK 74601

580-763-0120

halona.clawson@ponca.com

On Wed, Oct 17, 2018 at 10:24 AM <scott.tener@faa.gov> wrote:

> Yes, I'll get these out today. Can I FEDEX to the address below?
>
> Scott
>
> **From:** Halona Cabe <halona.clawson@ponca.com>
> **Sent:** Wednesday, October 17, 2018 10:08 AM
> **To:** Tener, Scott (FAA) <scott.tener@faa.gov>
> **Subject:** Re: Request for Section 106 Consultation, Ponca Nation - Terminal Project for Kansas City International Airport
>
> Could you send me hard copies?
>
> **Halona Cabe**
>
> **Tribal Historic Preservation Officer**
>
> **121 White Eagle Drive**
>
> **Ponca City, OK 74601**
>
> **580-763-0120**
>
> **halona.clawson@ponca.com**

On Wed, Oct 17, 2018 at 9:56 AM <scott.tener@faa.gov> wrote:

> Ms. Cabe,
>
> Hope all is going well. I am checking to see if you need any further information or need hard copies of any of the information already sent.
>
> Please let me know if you have any questions,
>
> Scott Tener
>
> Environmental Specialist
>
> FAA Central Region Airports Division
>
> 901 Locust St., Room 364
>
> Kansas City, Missouri 64106-2325
>
> T 816.329.2639 | F 816.329.2611
>
> http://www.faa.gov/airports/central/

From: Halona Cabe <halona.clawson@ponca.com>
Sent: Friday, September 28, 2018 11:35 AM
To: Tener, Scott (FAA) <scott.tener@faa.gov>
Subject: Re: (2 0f 3) Request for Section 106 Consultation, Ponca Nation - Terminal Project for Kansas City International Airport

Thank you for the call and I will get on this project right away.

Halona Cabe

Tribal Historic Preservation Officer

121 White Eagle Drive

Ponca City, OK 74601

580-763-0120

halona.clawson@ponca.com

On Fri, Sep 28, 2018 at 11:23 AM <scott.tener@faa.gov> wrote:

> Phase I Archeological Survey, July 2018, Golder Associates Inc. **(separate email 2 of 3)**
>
> ---
>
> **From:** Tener, Scott (FAA)
> **Subject:** (1 0f 3) Request for Section 106 Consultation, Kaw Nation - Terminal Project for Kansas City International Airport
>
> Ms. Clawson,

Please find attached letter outlining the proposed undertaking and efforts to date to determine direct and indirect impacts to historic and cultural resources.

Also attached are:

- Phase I Archeological Survey, July 2018, Golder Associates Inc. **(separate email 2 of 3)**
- Cultural Resource Investigations Phase I Survey, April 2008, ERC, Inc **(separate email 3 of 3)**
- Power Point Presentation given to Missouri SHPO and Osage Nation outlining efforts to date

More information is available in the Draft EA which can be downloaded from this link, http://www.flykci.com/media/7707/kci-terminal-ea-section-106-review_draft_august-2018.pdf

The Draft EA is currently available for public review and comment. To help in our preparation of the EA, we would appreciate your input (via mail or e-mail) within thirty (30) days. If you have questions or require additional information, please contact me at 816-329-2639 or scott.tener@faa.gov.

Please let me know if you have any questions,

Scott Tener

Environmental Specialist

FAA Central Region Airports Division

901 Locust St., Room 364

Kansas City, Missouri 64106-2325

T 816.329.2639 | F 816.329.2611

http://www.faa.gov/airports/central/

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Ponca Tribe of Oklahoma
Tribal Historic Preservation Office

121 White Eagle Drive ♦ (580) 763-0120 ♦♦ Fax (580) 763-0126
Ponca City, Oklahoma 74601

10/22/2018

Scott Tener, P.E..
Environmental Specialist
901 Locust
Kansas City, MO 64106

SUBJECT: **Environmental Assessment for Proposed Replacement Terminal Project Kansas City International Airport, Kansas City, Platte County, Missouri**

The Ponca Tribe of Oklahoma Historic Preservation Office has received notification and accompanying information for the proposed project listed above. The Ponca Tribe of Oklahoma has a long pre-contact occupational history in this area.

In accordance with the Historic Preservation Act, (NHPA) [54 U.S.C. § 300101 et seq.] 1966, undertakings subject to the review process are referred in 54 U.S.C. § 302706 (a), which clarifies that historic properties may have religious and cultural significance to Indian tribes. Additionally, Section 106 of NHPA requires Federal agencies to consider the effects of their actions on historic properties (36 CFR Part 800) as does the al Environmental Policy Act (43 U.S.C. 4321 and 4331-35 and 40 CFR 1501.7(a) of 1969).

The Ponca Tribe of Oklahoma has a vital interest in protecting its historic and ancestral cultural resources. The Ponca Tribe of Oklahoma anticipates reviewing and commenting on the planned **Environmental Assessment for Proposed Replacement Terminal Project Kansas City International Airport, Kansas City, Platte County, Missouri.**

Should you have any questions or need any additional information, please feel free to contact me at the email listed below. Thank you for consulting with the Ponca Tribe of Oklahoma on this matter.

Sincerely,

Halona Cabe

Halona Cabe
Tribal Historic Preservation Officer
Halona.clawson@ponca.com

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U.S. Department
of Transportation

**Federal Aviation
Administration**

Central Region
Iowa, Kansas,
Missouri, Nebraska

901 Locust
Kansas City, Missouri 64106
(816) 329-2600

October 22, 2018

CERTIFIED MAIL

Ms. Halona Cabe
Tribal Historic Preservation Officer
Ponca Tribe of Indians of Oklahoma
121 White Eagle Drive
Ponca City, OK 74601

Section 106 Coordination
Environmental Assessment for Proposed Replacement Terminal Project
Kansas City International Airport
Kansas City, Platte County, Missouri

Dear Ms. Cabe:

As requested per your October 22, 2018 response letter, please find enclosed the Draft Environmental Assessment for the Kansas City International Airport Passenger Terminal Project.

To help in our preparation of the EA, we would appreciate your input (via mail or e-mail) at your earliest convenience or within thirty (30) days. If you have questions or require additional information, please contact me at 816-329-2639 or scott.tener@faa.gov.

Sincerely,

Scott Tener, P.E.
Environmental Specialist

Chris Babb

Subject: FW: Environmental Assessment for Proposed Replacement Terminal Project Kansas City International Airport, Kansas City, Platte County, Missouri

Attachments: Environmental Assessment for Proposed Replacement Terminal Proj.pdf; Kansas City - Consultation Letter to Ponca Nation_10-22-18.pdf; RE: Environmental Assessment for Proposed Replacement Terminal Project Kansas City International Airport, Kansas City, Platte County, Missouri; Re: Request for Section 106 Consultation, Ponca Nation - Terminal Project for Kansas City International Airport

From: Tener, Scott (FAA)
Sent: Monday, October 22, 2018 11:03 AM
To: 'Halona Cabe' <halona.clawson@ponca.com>
Subject: RE: Environmental Assessment for Proposed Replacement Terminal Project Kansas City International Airport, Kansas City, Platte County, Missouri

As requested, we are overnighting a copy of the Draft Environmental Assessment for the Kansas City International Airport Passenger Terminal Project.

The Draft EA can also be downloaded from this link,
http://www.flykci.com/media/7707/kci-terminal-ea-section-106-review_draft_august-2018.pdf

To help in our preparation of the EA, we would appreciate your input (via mail or e-mail) at your earliest convenience or within thirty (30) days. If you have questions or require additional information, please contact me at 816-329-2639 or scott.tener@faa.gov.

Please let me know if you have any questions,

Scott Tener
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
http://www.faa.gov/airports/central/

From: Halona Cabe <halona.clawson@ponca.com>
Sent: Monday, October 22, 2018 9:36 AM
To: Tener, Scott (FAA) <scott.tener@faa.gov>
Subject: Environmental Assessment for Proposed Replacement Terminal Project Kansas City International Airport, Kansas City, Platte County, Missouri

Attached please find the tribal documents in regard to the above mentioned project. If you have any questions, please do not hesitate to contact me.

Halona Cabe

Tribal Historic Preservation Officer

121 White Eagle Drive

Ponca City, OK 74601

580-763-0120

halona.clawson@ponca.com

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Kansas City International Airport

Architectural and Historical Property Evaluation

For the Proposed Replacement Terminal Project

October 2018

Missouri State Historic Preservation Office Project Number:
007-PL-13 and 007-PL-18

Submitted by:

Cydney E. Millstein
Architectural & Historical Research, LLC
1537 Belleview Avenue
Kansas City, Missouri 64108

Table of Contents

SECTION		Page
I.	Introduction	1
II.	Historical Properties Affected	2
III.	Historical Overview	2
IV.	Project Area for this Evaluation	6
V.	Determination of the Period of Significance	8
VI.	Identification of associated resources constructed in 1972 within the Direct APE	10
VII.	Conclusions and Recommendations	13
VIII.	Endnotes	14

EXHIBITS		Page
1	Resources Located within the Direct APE	7
2	United States Postal Service Building	10
3	Airport Police and Central Chilling Plant Building	10
4	Airport Aviation Department Central Warehouse and Purchasing Building	11
5	Earthen Dam	11

TABLES		Page
1	Resources located within the Direct APE	9

I. Introduction

This study reports the findings and recommendations of an architectural and historical evaluation of specific buildings and structures at the Kansas City International Airport (KCI). The City of Kansas City, Missouri, (City), the owner of the Kansas City International Airport (KCI or Airport) in Platte County, Kansas City, Missouri proposes to construct a replacement passenger terminal building (the Proposed Action). The City of Kansas City, Missouri, Aviation Department (KCAD) is responsible for the operations of KCI. The Proposed Action includes the following major elements:

- Demolish existing Terminal A, including the Terminal A parking garage and aircraft apron;
- Construct a new replacement terminal (initial build to 39 gates, future 42 gates) and provide updated utilities including water lines;
- Construct a new parking garage and surface parking lot;
- Construct new terminal apron area around the replacement terminal including providing new fuel hydrants;
- Modify existing roadways and construct new roadways in the terminal area;
- Construct various storm water collection system improvements including improved glycol recovery system (deicing) and facilities;
- Construct replacement Central Utility Plant (CUP) and provide redundant electrical underground electrical power utility feed;
- Resurface and rehabilitate the taxiways in the vicinity of the replacement terminal; and,
- Decommission and demolish existing Terminal B and Terminal C and consolidate airline operations at the new replacement terminal (Terminal B and C would remain open during construction of the new terminal).
- The Proposed Action is anticipated to provide 39 gates upon opening with potential future expansion to 42 gates. Therefore, the Proposed Action would have less gates than that of the existing Terminals A, B, and C. The Proposed Action would occur completely on Airport-owned property and would not include any highway or rail improvements. The Terminal B and C demolition sites would remain undeveloped with appropriate ground cover. The Terminal B and C parking lots would remain operational for employee parking and/or customer parking. A new security fence would be constructed to divide the parking areas from the airport operations areas.

II. Historical Properties Affected

The Federal Aviation Administration (FAA) and the Missouri State Historic Preservation Office (SHPO) determined that Terminals A, B, and C are eligible for listing in the National Register of Historic Places (NRHP) under Criteria A in the area of Transportation and C in the area of Architecture.[1] Criteria A Transportation refers to the terminals significance for its innovative “Drive-to-Your-Gate” concept. Criteria C refers to the terminals significance as an example of Brutalist architecture and for its association with the prominent Kansas City Firm of Kivett and Myers and specifically the work of Clarence Kivett as the architect of record for the terminals. In addition, KCI “can meet the exceptional significance test under Criterion G” for properties that have achieved significance within the past fifty years.

The purpose of this evaluation is to provide an historic context of Terminals A, B and C, as these resources will be affected by their removal and replacement, and to examine other resources associated with the Terminals from the Period of Significance.

III. Historical Overview

Kansas City International Airport (KCI), originally known as Mid-Continent International Airport (MCI), was formally dedicated on October 21-23, 1972. Designed in the Brutalist style by the prominent Kansas City architectural firm of Kivett and Myers, with Burns & McDonnell, the three terminals (A, B & C), with their “Drive-To-Your-Gate” configuration was a unique design, the first of its kind implemented worldwide.

The planning and development of KCI is directly associated with Kansas City’s aviation history, which had a major impact on the city’s economic and industrial growth.

Aviation history in the metropolitan area of Kansas City began in 1922 with Richards Field, located near the intersection of Blue Ridge and Gregory boulevards, later incorporated into Raytown, Missouri.[2] The 156-acre field was dedicated by 1922, but soon proved inadequate for a growing metropolis. By 1924, Kansas City’s city council searched for a new location for a larger and accommodating airport.

To this end, the United States Army Air Corps surveyed a 687-acre tract in the flood plain of the confluence of the Missouri and Kansas rivers. Opening 1929, the new Municipal Airport became the headquarters for Transcontinental Air Transport (TAT), the precursor airline to Trans World Airlines (TWA). TWA’s presence in Kansas City later became vital to the planning and development of Kansas City International Airport.

Another airport of note was the Fairfax Industrial Airport across the state line in Kansas City, Kansas. Opening in 1928, the airport was linked to the surrounding construction of an industrial area, which after WWII became the home of the TWA

overhaul base providing the region with nearly 7,000 jobs.[3] Additionally, it is important to mention that Grandview Airport, which opened in 1943, became an auxiliary field for Kansas City and would later be critical to aviation operations.

A significant event, that of the Kansas City's 1951 flood, caused severe damage to the Municipal Airport and Fairfax Industrial Airport. The flood devastated both airport properties but the most significant damage was to the TWA overhaul base. As both airports were land locked and thus, unable to expand, the only solution was to find a site for a new airport. The push to find a new airport location became imminent when TWA stated that they would be forced to relocate the overhaul base if a decision could not be reached. The urgent need for longer landing strips was also an important factor.

Initially, two locations were examined—Lee's Summit and the existing airfield at Grandview, Missouri. While the former proved inadequate, the 1,800-acre site in Grandview was chosen by the city council of Kansas City. Two runways, a taxiway and a temporary terminal building were constructed. However, with the Cold War looming, the United States Air Force took command of the site as headquarters for its Central Air Defense Command on November 4, 1952. Called Richards-Gebaur Air Force Base, it was never used as a public airport.[4]

The Aviation Committee of Kansas City's city council, the Kansas City Airport Selection Committee, working with the Platte County Courts, examined a 3,300-acre site adjacent to US Highway 71 (now I-29), directly north of downtown Kansas City. Recognizing the potential and the need to have sufficient distance for landing and takeoff, officials purchased a total of 4,590 acres for the development of a new airport.[5] On May 3, 1953, Kansas City formally named Platte County as the location of a new Mid-Continent Airport (MCI), now the Kansas City International Airport (KCI). At that time, only two other airports exceeded the acreage of the new MCI, namely, Idlewild (John F. Kennedy) Airport, New York, and the San Francisco International Airport.[6]

With the land acquisition complete, Kansas City began negotiations with TWA for the establishment of their new overhaul base at the site. By April 1954 a deal was struck whereby 250 acres was leased to TWA. Construction of their new overhaul base began in the fall of 1954. Bonds totaling $18.7 million were issued to finance the base, with TWA to pay an annual rental of $1 million.[7]

Between 1954 and 1956, two runways were constructed at the TWA overhaul base: the north-south runway No. 01L/19R, at 6,000 feet in length; the east-west runway, No.19/27, measured 9,500 feet in length. In 1958, the north-south runway was extended to 9,000 feet and a subsequent addition enlarged the runway to 10,800 feet in 1970.[8] These runways gave TWA access to their overhaul base, as well as a place to land large aircraft during wet weather when the runways at Municipal were too wet to accommodate a safe landing. Additionally, the first control tower located at MCI was built during this construction period (no longer extant).[9] It is clear that TWA was firmly embedded in Kansas City's commerce by 1956.

In his book *Kansas City and How It Grew*, James R. Shortridge states that: "the official name for the field [overhaul base location]—Mid-Continent International—also was carefully chosen. It suggested the location and honored the airport's other major client, Mid-Continent Airlines, while simultaneously avoiding use of the potentially antagonistic words "Kansas City."[10]

With the completion of TWA's overhaul base, runways and control tower, Kansas City officials set their sights on a new terminal that was to be city owned and operated. Using the existing name of Mid-Continent International (MCI), this new complex took nearly 20 years to complete. Additionally, the TWA overhaul base would need to be enlarged before it could be capable of handing the new large jetliners, such as Boeing's 747, which eventually became part of the TWA fleet.[11]

On December 1, 1966, after federal officials judged Municipal Airport "unsafe for large jet aircraft" a bond issue for $150 million was presented and later approved at a 24:1 margin. Subsequently, the city initiated extensive studies for aviation needs. Two firms, Kivett & Myers, architects, and the engineering firm Burns & McDonnell, were hired to prepare concepts to the Aviation Committee at City Hall. The two Kansas City-based firms worked in tandem, along with the various airlines serving Kansas City at that time.[12]

Eight design concepts[13] for the new airport had been considered with attention given to conventional airport configurations for Houston, Dulles, and Tampa. Ultimately, designs for these terminals weren't acceptable due to operational problems and "the use of mechanical devices between terminals and the aircraft" for passenger transfer.[14] Mayor Ilus Davis, with complete support from TWA, chose a radical departure, the "Drive-To-Your-Gate" configuration because "Kansas City had very few transfer passengers." TWA insisted on "direct access to the gate" a concept "that produced the capability of delivering the passengers virtually to the door of the aircraft."[15]

"There is nothing like it [Drive-To-Your-Gate] in the world— it's so good that Dallas-Ft. Worth is copying it . . . ", stated Clarence Kivett (the architect of record for MCI), regarding this unique design. [16] Four Brutalist styled reinforced concrete terminals were part of the world's shortest walk-to-fly concept, with the fourth to be constructed at a later date. However, only three, the current terminals A, B, and C were implemented.

Per Kivett and Myers' original design, each of the three terminals, planned in 80% of a full circle, measures 65 ft. wide, 2,300 ft. in length, 1,000 feet in diameter and features three levels. As originally designed, the Apron Level, located at the lowest level, accommodates aircraft gate parking positions, utility and service facilities. Here, the passenger has no contact with these functions. The passenger service level, located at the second floor, accommodates passenger processing and vehicular circulation. A mezzanine, which originally contained restaurants and

cocktail lounges, as well as VIP rooms, is located at the third level. Ground level parking was located within the loop road of each terminal.[17]

The "Drive-To-Your-Gate processing system "reduced a passenger's walking distance to as little as 75 feet from curbside drop off and check-in to the aircraft loading bridge. The average walking distance for the majority of existing airports in the world is more than 1,000 feet." In order to implement this unique system, the eight airlines serving KCI modified their "traditional methods of centralized ticketing and baggage check in."[18]

The exterior and interior of each terminal, as originally designed, features unique structural components that further characterize KCI's landmark design. As described in *Architectural Forum*:

> The structure is equally simple; V-shaped columns, 40 ft. high, on the aircraft side; and Y-shaped columns, 26 ft. high, on the landside. Concrete roof bents connect the columns in a "diagonal" pattern, and waffle slabs span between these in a diamond-shaped grid. The concrete was cast-in-place and left exposed.[19]

After the grand opening of KCI in October 1972, several modifications were made to the complex. J. E. Dunn, Kansas City constructed two underground parking garages, designed by George Butler & Associates, Kansas City, at Terminals A and C, 1989 and 1999, respectively, to address insufficient parking. Nearly 1.5 million square feet of parking space was added.[20] The original parking lots were razed.

In 1994 the Federal Aviation Administration (FAA) determined that the existing control tower, located at the airport's nerve center directly to the northeast of the terminals, was inadequate. Walton Construction Company was hired to build a new 250-foot tower of pre-cast concrete and steel. The tower, completed by 1997, was linked to a 2-story, 24,000 square-foot approach radar base outfitted with more sophisticated radar. The former tower was razed to make room for additional parking.[21]

In March 2000 a major upgrade for KCI was announced funded by a $184.3 million renovation budget for all three terminals. The renovation or Terminal Improvement Project (TIP) included new baggage handling, roofs, exterior glazing, signage, increased electrical capacity and a tunnel linking the parking at Terminal C.[22]

By August 2000, voters approved a total of $395 million bond program for improvements to KCI, which increased the original budget amount significantly. Additional work added to the project included: 15,000 long-term parking spaces, a car rental facility, and an upgrade to the TWA overhaul base, costing $110 million.[23]

Additionally, the flooring of all terminals was replaced. A blue terrazzo tile with inlaid brass and multicolored patterns was chosen under the 1% Arts Program, a civic

construction project for art. New York artists, Kristin Jones and Andrew Gimbel created the floor design called "Polarities".[24]

HNTB Corporation was the designer, Burns & McDonnell administered the renovation, and Walton Construction Company was the general contractor for the TIP project. Work began in June 2001 with the completion of the project slated for 2004.

Three months after the TIP work began, the US came under terrorist attack on September 11, 2001. Air traffic across the country came to a complete halt and resumed on September 15. As a consequence, airport security at KCI changed drastically with new restrictions on carry-on luggage, longer wait in lines and a stronger presence of law enforcement. It was also noted that although renovations were progressing, changes to the TIP project would need to be made to handle new nationally mandated security measures with equipment such as new gate check points with metal detectors.[25]

With this new project, the original interior of KCI was vastly modified with the addition of high security walls that separate the concourse from the passenger holding areas constructed of bullet and blast proof glass. These alterations completely eliminated the unique "Drive-To-Your-Gate" arrangement as originally designed and described above. Other improvements that further modified the original scheme, which may have been included in the earlier renovation program, included the extension of glass entryways or bump-outs, construction of additional bathrooms, relocation of ticket counters, and additional amenities. Other changes included 30,000 square feet of existing curbs into interior space that allowed for additional seating at the PSL level, and a new HVAC system. Asbestos removal was also included in the renovation.

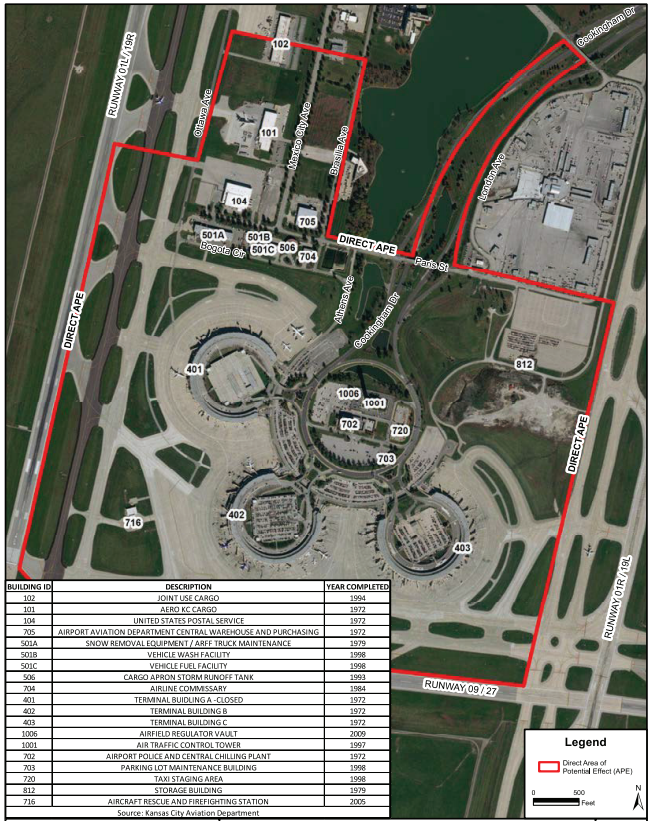
IV. Project Area for this Evaluation

The Area of Potential Effects (APE) is "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties" (36 C.F.R. § 800.16(d)). For purposes of Section 106, the term "historic properties" can include architectural, archeological, or cultural resources. The determination of the APE considers the character of a project area and the potential for resources to be found.

The Proposed Action, as described in Part I, above, would include ground disturbance and construction activities within the existing terminal complex. The land uses within this area are made up of developed land used for Airport operations. Therefore, in order to determine the direct impacts of the Proposed Action, the Direct APE was defined as the area of potential physical disturbance.

In additional to Terminals A, B and C, there are 19 resources located within the Direct APE, as illustrated in **Exhibit 1**.

Exhibit 1: Resources Located within the Direct APE



BUILDING ID	DESCRIPTION	YEAR COMPLETED
102	JOINT USE CARGO	1994
101	AERO KC CARGO	1972
104	UNITED STATES POSTAL SERVICE	1972
705	AIRPORT AVIATION DEPARTMENT CENTRAL WAREHOUSE AND PURCHASING	1972
501A	SNOW REMOVAL EQUIPMENT / ARFF TRUCK MAINTENANCE	1979
501B	VEHICLE WASH FACILITY	1998
501C	VEHICLE FUEL FACILITY	1998
506	CARGO APRON STORM RUNOFF TANK	1993
704	AIRLINE COMMISSARY	1984
401	TERMINAL BUIDLING A -CLOSED	1972
402	TERMINAL BUILDING B	1972
403	TERMINAL BUILDING C	1972
1006	AIRFIELD REGULATOR VAULT	2009
1001	AIR TRAFFIC CONTROL TOWER	1997
702	AIRPORT POLICE AND CENTRAL CHILLING PLANT	1972
703	PARKING LOT MAINTENANCE BUILDING	1998
720	TAXI STAGING AREA	1998
812	STORAGE BUILDING	1979
716	AIRCRAFT RESCUE AND FIREFIGHTING STATION	2005

Source: Kansas City Aviation Department

Replacement Terminal Project *Kansas City International Airport*	**Structures within the Direct APE**	EXHIBIT: **1**

1/17/2018 Y:\PCD\South Terminal\ACAD Work Products\[Exhibit 1 - Structures within the Direct APE.xlsx]

V. Determination of the Period of Significance

As previously mentioned, KCI is eligible for listing in the National Register under Criteria A and C for Transportation and Engineering and may meet the exceptional significance test under Criterion G. In order to understand the Period of Significance (POS) for KCI, it is critical to refer to the National Register Bulletin 15a, *How to Complete the National Register Nomination Form*.

For properties significant under Criterion A, the period of significance "is the span of time when the property actively contributed to the trend." Yet for properties eligible under Criteria Consideration G, there is no clear guidance on how to determine a Criterion A period of significance and if a span of time can be considered for properties less than 50 years of age. Lastly, NR Bulletin 22, *Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past Fifty Years* does not instruct how to determine period of significance.

"For architecturally significant properties under Criterion C, the period of significance is the date of construction." Although initial planning and design for the Terminals began in 1966 with construction commencing in 1968, the terminals were completed and opened in October 1972.

Therefore, taking the NPS technical information into consideration, for this evaluation the period of significance for the terminals eligible for NRHP listing is 1972, the date of construction, because there is no definitive criteria in which to evaluate period of significance for properties that are eligible under Criterion G for exceptional significance.

Other resources within the Direct APE date from 1972 to 2009, but for the purpose of this study, only those resources constructed in 1972 have been examined. It should be noted that a formal architectural/historical survey for those resources within the Direct APE was not part of this study.

Table 1 lists the all buildings/structures within the Direct APE. The buildings and structures highlighted in blue were built during 1972.

Table 1: Resources located within the Direct APE*

Date	Resource	ID #	Architect / Engineer /Contractor	Resource Type
1972	Aero KC Cargo (modified c. 1987)	**101**	Unknown / (Field Maintenance Service Pit plans May 1987 for 125 NW Paris Street)	Building
1972	Terminal Building A	**401**	Kivett & Myers-B&Mc / Del E. Webb Construction	Building
1972	Terminal Building B	**402**	Kivett & Myers-B&Mc / Del E. Webb Construction	Building
1972	Terminal Building C	**403**	Kivett & Myers-B&Mc / Del E. Webb Construction	Building
1972	United States Postal Service	104	Attrib. to Kivett & Myers	Building
1972	Airport Police and Central Chilling Plant	**702**	Burns and McDonnell / Sharpe and Kidde	Building
1972	Airport Aviation Department Central Warehouse and Purchasing	**705**	Unknown	Building
1972	Drainage Control Reservoir		Burns & McDonnell	Structure
1972	Earthen Dam		Burns & McDonnell	Structure
1972	Service Roads, i.e. Cookingham Drive		Burns & McDonnell	Structure
1979	Snow Removal Equipment / ARFF Truck Maintenance	**501A**	Unknown; KCMO plans for Bogota Circle	Building
1979	Storage Building	**812**	Unknown KCMO plans	Building
1984	Airline Commissary	**704**	Unknown; KCMO plans (Bogota Circle or Brasillia Ave.)	Building
1993	Cargo Apron Storm Runoff Tank	**506**	Unknown; KCMO plans (Paris Street)	Structure
1994	Joint Use Cargo	**102**	Unknown; KCMO plans (Mexico City Avenue)	Building
1997	Air Traffic Control Tower	**1001**	FAA / Walton Construction Company	Building
1998	Vehicle fuel Facility	**501C**	Unknown; KCMO plans (Bogota Circle)	Building
1998	Vehicle Wash Facility	**501B**	Unknown; KCMO plans (Bogota Circle)	Building
1998	Parking Lot Maintenance Building	**703**	Unknown; KCMO plans	Building
1998	Taxi Staging Area	**720**	Unknown; KCMO plans	Structure
2005	Aircraft Rescue and Firefighting Station	**716**	Unknown; KCMO plans	Building
2009	Airfield Regulator Vault	**1006**	Unknown; KCMO plans	Building

Source: KCAD, 2018.
Notes: The runways date to the TWA Overhaul Base from 1954-1956 with a modification in 1958.
Buildings highlighted in grey have already been determined to be eligible for listing in the NRHP.
Resources highlighted in blue date from 1972.
Because Aero KC Cargo (Building No. 101) was significantly modified in 1987, it was not considered in this evaluation.

VI. Identification of associated resources constructed in 1972 within the Direct APE.

1. United States Postal Service (Building No.104)

The United States Postal Service building, located at 156 Paris Street, measures approximately 31,000 square feet. The Modern commercial design is attributed to Kivett & Myers.

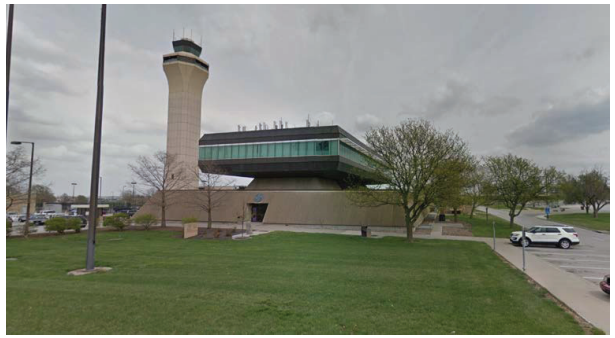
Exhibit 2: United States Postal Service Building



2. Airport Police and Central Chilling Plant Building (Building No.702)

The Airport Police and Central Chilling Plant building is approximately 44,300 square feet and is located at 1 International Square Paris. Burns & McDonnell, with Sharpe and Kidde, were responsible for the Brutalist style design.

Exhibit 3: Airport Police and Central Chilling Plant Building



3. Airport Aviation Department Central Warehouse and Purchasing Building (Building No. 705)

The Modern style Airport Aviation Department Central Warehouse and Purchasing Building is approximately 79,600 square feet and is located at 533 Mexico City Avenue.

Exhibit 4: Airport Aviation Department Central Warehouse and Purchasing Building



4. Drainage Control Reservoir

The drainage control reservoir is part of the storm water detention system. It was constructed to provide for the increase in impervious surface associated with the new terminals, aprons, and surface parking lots. Over the years, this structure, designed by Burns & McDonnell, has been enlarged and modified with new riprap and new mechanical systems.

5. Earthen Dam

The earthen dam, designed by Burns & McDonnell, is part of the storm water detention system and storm water pollution control. It was designed to provide for the increase in impervious surface associated with the new terminals, aprons, and surface parking lots.

Exhibit 5: Earthen Dam



6. Cookingham Drive/Service Roads

Cookingham Drive, currently a four-lane access road provides entry to the terminal area. Grade separated interchanges service KCI's secondary road system and supporting facilities. The first interchange west of I-29 on Cookingham Drive is Bern Street, where the on-airport hotel, economy parking lots, off-airport parking, GA and air cargo facilities are located. The second interchange is Paris Street, servicing the consolidated rental car facility, air cargo facilities, Airport police, flight kitchens, postal facility, airline support buildings, service station and the terminal service road. Cookingham Drive terminates at International Circle, a one-way circular road. International Circle then connects to three one-way loop roads (Amsterdam Circle, Rome Circle, and Beirut Circle). The loop roads connect to their respective terminal buildings; Amsterdam Circle to Terminal A, Rome Circle to Terminal B, and Beirut Circle to Terminal C. Throughout the years, these roads have been enlarged, redirected and repaved to accommodate increase in traffic to KCI.

VII. Conclusions and Recommendations

As previously determined, the terminals designed by Kivett & Myers with Burns & McDonnell and constructed in 1972 are eligible for inclusion in the National Register of Historic Places for their significance for its innovative "Drive-to-Your-Gate" concept, for their significance as an example of Brutalist architecture, and for its association with the prominent Kansas City firms of Burns & McDonnell and Kivett and Myers.

From the Period of Significance, 1972, Terminals A, B and C and six resources (buildings and structures) remain extant. Since 1972, other resources associated with KCI and located within the Direct APE are extant. Throughout the years, changes to resources within the Direct APE have occurred; i.e., runways and service roads have been enlarged and repaved, and/or replaced. The main approach to the Terminals was altered from the original design to accommodate the new parking structures that replaced the original parking lots to each Terminal. Additionally, the drainage control reservoir has been modified from the original design to accommodate increased air traffic. Runways existed before the passenger terminals were constructed or were built after the POS.

If a KCI district were considered in light of the demolition of Terminals A, B and C, the result of this action would negatively impact the integrity of a potential district. In *National Register Bulletin 15a*, "How to Apply the National Register Criteria for Evaluation" the validity of historic districts is discussed, to wit: "For a district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished." Furthermore, the *Bulletin* states that, "In addition, the relationships among the district's components must be substantially unchanged since the period of significance." And finally, and possibly most important to KCI, "a component of a district cannot contribute to the significance if it does not share the historic associations of the district."

With the imminent demolition of Terminals A, B and C, the remaining buildings and structures built during the period of significance would lack the historic association in order to justify and demonstrate how they qualify for listing. In other words, they would no longer share the historic associations or relationship to the Terminals from that discrete era. For the reasons outlined above in this evaluation it is recommended that the eligible properties, Terminals A, B, and C, be defined as a "*Building"* per the National Register Bulletin guidelines and with their impending demolition, the justification for a district can not be defined, assessed and ultimately defended in order to meet the National Register of Historic Places criteria for evaluation. It would be impossible to measure importance, and therefore significance, as the framework or context for which these resources were designed and constructed would no longer exist.

VIII. Endnotes

[1] It should be clear that KCI is also eligible under Criterion C for Engineering significance. Burns & McDonnell, Kansas City, was responsible for the master planning, design and supervision.
[2] James R. Shortridge, *Kansas City and How It Grew, 1822-2011*. (Lawrence, KC: University Press of Kansas, 2012),105.
[3] TWA's commercial flights continued to land and depart from Kansas City Downtown Municipal at this time.
[4] Shortridge, 105.
[5] *Ibid*, 106. Shortridge points out that before the land in Platte County was chosen, City Manager Cookingham considered "15 possible sites in Jackson and Clay counties." Cookingham recommended 2,850 acres in Clay, near Liberty and U.S. Highway 69, but due to severe opposition, the acreage in Platte County was chosen.
[6] "KCI: Official Souvenir Program Dedication Program," October 21-23, 1972, 48.
[7] In 1972, Del E. Webb, the contractor for KCI, modified the TWA overhaul base originally designed by Burns & McDonnell, with Kivett & Myers. A hyperbolic (paraboloid) structure was added.
[8] "KCI: Official Souvenir Program," 50.
[9] *The Kansas City Star*, 21 February 1968. The first control tower constructed in what was to become the central powerhouse or "nerve center" of the airport was completed by 1962. When KCI construction commenced in 1968, the original tower was found to be 61 feet too short under the new FAA standards. Burns & McDonnell with Kivett & Myers redesigned the original tower that basically entailed putting a sleeve around the original tower and adding 61 feet to the height to bring it to 200' in overall height. The cost for the extra 61 feet came to $700,000.00. The original tower was replaced in 1997.
[10] Shortridge,106.
[11] "KCI: Official Souvenir Program Dedication Program," October 21-23, 1972, 50.
[12] Ibid. 50. Others associated with the airport design and construction, include: Del E. Webb Construction Company, and Sasaki Walker Associates, Landscape Consultants. Burns & McDonnell was responsible for master planning, design and supervision, with Kivett and Myers in charge of architectural design of the terminal buildings, control tower modifications and management offices.
[13] Airport configurations that were considered included "Central Terminal with Mobile Lounges", "Central Terminal with Shuttle", "Three Unit", and "Four Unit" terminals, among others. See: Burns & McDonnell and Kivett & Myers, "City Council Briefing, Mid Continent International Airport Progress report on Concept Studies," August 27, 1965. These two firms were in consultation with the city before they were officially contracted.
[14] Jay D. Starling, James Brown, et. al. "Technology and Politics: The Regional Airport Experience. National Aeronautics and Space Administration, Grant Number 83-49, NSG-2006. May 1976.
[15] Ibid. 20-21.
[16] Jerry Kohler, " 'World's Shortest' A 75-foot Walk To Get Aboard," *The Kansas City Star*, October 15, 1972, 6D. MCI influenced the planning of airports in Europe,

South America, and elsewhere in the U.S., including the Dallas/Ft. Worth airport, which opened in 1973. See also: Hanan A. Kivett, "Kanas City International Airport: World's Shortest Walk-To-Fly," American Society of Civil Engineers National Transportation Engineering Meeting, July 17-21, 1972, Milwaukee Wisconsin.

[17] Hanan A. Kivett, 8-10.

[18] Ibid, 6

[19] "Kansas City International", *Architectural Forum*, 136 (May 1972), 28.

[20] KCI Terminals A and C Parking Garages www.jedunn.com/projects/kci-terminals-and-c-parking-garages The garages are constructed of cast-in-place, post-tensioned concrete with silica.

[21] "KCI Tower to be Replaced with sophisticated facility", *The Kansas City Star* 8 March 1994, D3.

[22] "KCI Looks Ahead to Improvements on Drawing Board." *The Kansas City Star* 22 March 2000, 25.

[23] "Voters Passing Bonds for KCI," *The Kansas City Star* 9 August 2000, B1. While TWA employed only 2,600 at the overhaul base, Kansas City voters were unwilling to lose TWA presence in the region.

[24] Council likes KCI Floor, *The Kansas City Star* 1 June 2001, B1.

[25] "Airports Reopen to New Security," *The Kansas City Star* 16 September 2001, A8.

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Federal Aviation Administration

Memorandum

Date: November15, 2018

To: Jim Johnson, Director, Central Region Airports Division (ACE-600)

From: Katherine Andrus, Federal Preservation Officer (AEE-400)

Subject: Review of Findings under Section 106 for the Kansas City International Airport Terminal Replacement Project – National Register Eligibility of Resources in the Direct APE

Section 106 of the National Historic Preservation Act requires the FAA to consider the effects of its undertakings on historic properties, which are defined as properties listed or eligible for listing in the National Register of Historic Places. FAA is conducting a review pursuant to Section 106 of the proposal by the City of Kansas City, Missouri Aviation Department (KCAD) to demolish the existing passenger terminals at Kansas City International Airport (MCI) and construct a replacement terminal building and associated support facilities. As the FAA's Federal Preservation Officer, I have assessed the recommended findings on the identification of historic properties affected by the undertaking and, specifically, the eligibility of resources for the National Register.

The FAA has followed the process set forth in regulations at 36 CFR part 800 and in FAA guidance to evaluate the effect of this undertaking on historic properties. The FAA has consulted with the Missouri State Historic Preservation Office (SHPO), the City of Kansas City (as project sponsor), the Kaw Nation, the Osage Nation, the Pawnee Nation and the Ponca Tribe of Oklahoma and has coordinated with the Advisory Council on Historic Preservation (ACHP). In addition, the FAA has received public comments on the draft Environmental Assessment for this project. In conducting this review, FAA is also guided by ACHP's *Meeting the "Reasonable and Good Faith" Identification Standard in Section 106 Review* and by National Register Bulletin *How to Apply the National Register Criteria for Evaluation*.

I have reviewed the *Architectural and Historical Property Evaluation* prepared by KCAD's consultant, Architectural & Historical Research, LLC, in October 2018; correspondence between the FAA and the SHPO; and the public comments pertaining to historic properties potentially affected by the undertaking. The following assessment is informed by these materials, relevant guidance and other widely available information on the history of the airport as well as by my experience and training in the field of historic preservation.

Identification and Evaluation of Historic Properties

For this undertaking, the FAA defined two areas of potential effect (APE) – the area physically affected by demolition of the existing terminals and construction of the replacement terminal (the Direct APE) and a wider area that could be affected by the introduction of atmospheric, auditory or visual features as a result of the undertaking (the Indirect APE). This memorandum only addresses resources within the Direct APE.

Within the Direct APE, KCAD's consultants identified 22 aboveground resources consisting of buildings and structures (see Exhibit 1 and Table 1 of the Architectural and Historical Property Evaluation). In addition, KCAD conducted an archaeological survey to explore the potential for archaeological resources. Although no prehistoric or historic artifacts were encountered during the archaeological survey within the direct APE, subsurface investigations were prevented by the presence of existing infrastructure; therefore, the potential for resources eligible under Criterion D cannot be ruled out at this time.

In 2013, the SHPO opined that Terminals A and B were eligible for the National Register under Criteria A, for the unique role that the complex played in the history of commercial aviation in Kansas City, and under Criterion C, because of its innovative design and association with the prominent Kanas City architectural firm of Kivett and Meyers.[1] The SHPO found that despite alterations to the terminals, they retained sufficient integrity to be eligible for listing. The SHPO further opined that the property could meet the exceptional significance test for properties less than 50 years old under Criteria Consideration G. Subsequently, the SHPO has suggested that the terminals should be evaluated as part of an eligible historic district encompassing the entire airport. KCAD's consultants prepared the *Architectural and Historical Property Evaluation* to provide the historic context for the airport and a comprehensive identification of extant resources within the Direct APE boundaries.

Significance under Criterion A

Kansas City International Airport, originally known as Mid-Continent International Airport (MCI), represents the transition from the early days of commercial aviation, when airports were often sited close to downtown commercial districts, to the Jet Age, when the need for longer runways and distance from residential areas prompted consideration of locations in undeveloped areas farther from urban centers. When it was completed in 1972, it was one of the country's largest airports and the showplace for Trans World Airways (TWA), then headquartered in Kansas City.

[1] Letter from Mark A. Miles, Director and Deputy State Historic Preservation Officer, to Rob Adams, Landrum & Brown (July 16, 2013).

The location of a new airport for Kansas City in Platte County was announced on May 3, 1953 as part of an effort to keep TWA in the region following the Great Flood of 1951, which had destroyed TWA's facilities at Fairfax Airport. Construction of two runways, an air traffic control tower and a new maintenance facility for TWA began in 1954, and MCI and the TWA Overhaul Base both opened in 1957. However, the new MCI airport did not serve commercial passenger airlines until 1972. In the interim, Kansas City's Municipal Airport served as the passenger airport for the area.[2]

In 1966, after the FAA determined that Municipal Airport was unsafe for large jet aircraft, voters approved a $150 million bond issue to move Kansas City's main airport to MCI. The City hired Kivett & Myers, architects, and the engineering firm Burns & McDonnell to prepare concepts for a new terminal complex at MCI. Eight design concepts were considered over the next 18 months. The final design, selected with the support of TWA, aimed to streamline the passenger experience by minimizing the distance from curbside to aircraft boarding gate. Construction began in 1968, and MCI officially opened for passenger service on November 11, 1972. The new terminals were sited within the existing airfield and oriented around the original air traffic control tower.[3]

The new passenger airport reflects the Jet Age aspiration to make commercial air travel as popular and convenient as travel by train, bus or automobile. Vice President Agnew spoke at the dedication ceremony in October 1972 and hailed its forward-looking design: "Vision, the gift to see the future as a place of hope and progress and expansion . . . That, ladies and gentlemen, is the secret ingredient that has made this airport possible."[4] However, that vision of air travel did not take into account new FAA security procedures necessitated by a spate of commercial aircraft hijackings in the late 1960s and '70s, which changed the airline passenger experience forever. Following the imposition of mandatory screening in February 1972 and the Anti-Hijacking Act of 1974, passengers were barred from the aircraft unless they consented to a search and metal detectors or pat downs became a standard part of air travel. MCI was one of the first and one of the last airports to embrace the idea that boarding an airplane should be as simple as getting on a bus.

Based on this history, MCI is significant under Criterion A in the area of Transportation for its association with the Jet Age and with Kansas City's efforts to retain TWA as a major employer in the region.

[2] Municipal was renamed Kansas City Downtown Airport; it is currently the Charles B. Wheeler Downtown Airport.

[3] In 1994, the FAA determined that the original control tower was inadequate. Walton Construction Company was hired to build a new 250-foot tower. The tower, completed by 1997, was linked to a 2-story, 24,000 square-foot approach radar base outfitted with more sophisticated radar. The former tower was razed to make room for additional parking.

[4] Quoted in *The why of KCI: A broken plan that many travelers still love*, The Kansas City Star, March 8, 2014, accessed 11/1/2018 at https://www.kansascity.com/news/politics-government/article341740/The-why-of-KCI-A-broken-plan-that-many-travelers-still-love.html

Significance under Criterion C

The passenger terminals at MCI, designed by Kivett & Myers with engineering work by Burns & McDonnell, are examples of the Brutalist style of architecture, which was widely used for public buildings in the United States in the 1960s and '70s. The terminal buildings have distinctive architectural features typical of this style:

> The structure is equally simple; V-shaped columns, 40 ft. high, on the aircraft side; and Y-shaped columns, 26 ft. high, on the landside. Concrete roof bents connect the columns in a "diagonal" pattern, and waffle slabs span between these in a diamond-shaped grid. The concrete was cast-in-place and left exposed.[5]

MCI's passenger complex also illustrates a novel design concept for airports. A typical airport terminal of the early jet age had a centralized hall through which all passengers entered, with corridors along which gates were located (finger piers) or extending out to aircraft parking locations (satellite design). Because Kansas City had very few transfer passengers, TWA advocated minimizing the distance between the curb where passengers were dropped off and the gate at which they boarded the aircraft by employing a linear design, with ground access on one side and aircraft gates on the other. This became known as the "Drive-To-Your-Gate" or gate-arrival configuration. According to one aviation expert:

> The gate-arrival design became fashionable in the late 1960s, possibly because few people had experienced, or thought about, the disadvantage of this approach. A gate-arrival terminal naturally requires separate baggage-handling and check-in facilities at or near each aircraft position, significantly increasing the equipment and personnel needed to serve passengers. The maximum distance from one end to the other is much longer in a linear terminal than in a centralized terminal, especially if the former has aircraft on only one side of the building. The gate-arrival terminal can thus be quite unattractive both for transferring passengers and for returning travelers who wish to pick up cars they may have parked in front of some distant gate.[6]

The MCI passenger complex embodied the "Drive-To-Your-Gate" concept and was the first of its kind implemented worldwide (the other airport built in accordance with this concept was Terminal A of Berlin's Tegel Airport, opened in 1974). The terminals were linear, measuring 65 ft. wide and 2,300 ft. in length, but were curved to create 80% of a full circle 1,000 feet in diameter. Each building had three levels: Passengers entered from

[5] "Kansas City International", *Architectural Forum*, 136 (May 1972), 28.

[6] Richard de Neufville, Center for Transportation Studies, Massachusetts Institute of Technology *Designing the Airport Terminal* (date unknown), accessed 11/1/2018 at http://onlinepubs.trb.org/Onlinepubs/sr/sr159/159-022.pdf

curbside to the middle level, containing ticketing and other passenger services, and proceeded directly to their gate; a mezzanine above contained restaurants and cocktail lounges, as well as VIP rooms; and the apron level below provided access for airline and airport employees to aircraft parking positions, utility and service facilities.

Unfortunately, by the time the terminals at MCI opened, the FAA had imposed a new requirement for passenger and baggage screening that made the terminals' decentralized layout and open plan problematic from the start. Almost immediately after construction was completed, glass walls were added to the interiors to separate the ticketing and boarding areas, security checkpoints had to be created for each gate, and much of the convenience associated with the original design was compromised.

Although the design contemplated four separate terminals, only three – Terminals A, B and C – were constructed. The terminals were constructed as nodes around International Circle, in the center of which was located a combined Airport Police Station and Central Chilling Plant, designed by Burns & McDonnell with Sharpe and Kidde in the Brutalist style (this area was also the location of the original air traffic control tower). Three one-way loop roads providing access to the terminal buildings: Amsterdam Circle to Terminal A, Rome Circle to Terminal B, and Beirut Circle to Terminal C. Surface parking was located within the loop road of each terminal, and a system of access roads, named for other foreign destinations, echoed the international theme.

Also dating to 1972 are a Burns & McDonnell-designed drainage control reservoir and earthen dam; a USPS facility in a modern commercial style, attributed to Kivett & Myers; an Airport Aviation Department Central Warehouse and Purchasing facility in a modern industrial style and the Aero KC Cargo facility.

The MCI Terminal Complex is significant under Criterion C in the area of architecture for its embodiment of the distinctive characteristics of the Brutalist architectural style and the gate-arrival design for airport terminals.

Evaluation as an Historic District

Although the terminal buildings have previously been considered as individual buildings, the interrelationship of the terminals with the airside facilities (runways, taxiways and aprons), groundside circulation features and airport support facilities is best understood within the framework of a historic district.

The boundaries of a potential MCI Historic District would encompass the airfield, the terminals, the Airport Police Station and Central Chilling Plant located in the center of the terminal complex, along with the associated access roads, the earthen dam and drainage control reservoir. These buildings and structures form a significant and cohesive linkage that collectively convey the historic and architectural significance of MCI. This district would also include the other buildings constructed contemporaneously with the terminal complex as well as earlier and later cargo and support facilities, which are linked historically, though not stylistically, to the potential district.

Of the buildings within this potential district, the three terminals and the Airport Police Station/Central Chilling Plant contribute to both its architectural and historic significance. Of the other buildings constructed in 1972, the Airport Aviation Department Central Warehouse and Purchasing facility may contribute; the Aero KC Cargo facility was significantly modified in 1987 and no longer contributes to an eligible district due to loss of integrity. The USPS building, located on the periphery of the terminal complex, also would be within these boundaries and likely would be considered a contributing building but may be best evaluated in the national context of postal facilities constructed in the 1970s.[7]

The earthen dam and reservoir and roadway system dating to 1972 would be contributing structures, as would those portions of the airfield constructed prior to 1972 that retain integrity. The original terminal parking lots were altered when underground parking garages were constructed at Terminal A (1989), Terminal B (1991), and Terminal C (1999). Throughout the years, the access roads have been enlarged, redirected and repaved to accommodate increase in vehicular traffic but still display the pattern of interlocking rings characteristic of the original layout and thus would likely be considered as contributing elements. Other landscape features may be part of the setting.

The original airfield layout is an integral part of this district, although modifications and repairs over time have affected its integrity. The west parallel runway (Runway 1L-19R) was constructed between 1954 and 1955 to a length of 6,000 feet, extended to 9,000 feet in 1958, and extended to 10,800 feet in 1970. The crosswind runway (Runway 9-27) was constructed between 1968 and 1972. The east parallel runway (Runway 1R-19L) would be a non-contributing element as it was constructed between 1993 and 1994.

Non-contributing buildings within the Direct APE include the Snow Removal Equipment /ARFF Truck Maintenance building (1979), the vehicle wash and vehicle fuel facilities (1998), a storm runoff tank (1993) and the Airline Commissary (1984), all on Bogota Circle; a storage building (1979) located to the northeast of the terminal complex on NW Airworld Dr.; a joint-use cargo facility (1994) on Mexico City Avenue; a Parking Lot Maintenance building (1998) and the 1997 air traffic control tower, within International Circle; and the Airport Rescue and Firefighting (ARFF) station (2005, located to the west of Terminal B.

Period of Significance

The period of significance for this district would begin in 1957, with the opening of MCI, and extend through the opening of the terminal complex in 1972. Because initial planning and design of the passenger complex was initiated in 1966 and construction commenced in 1968, this district does not have to meet Criterion Consideration G for properties that have

[7] See USPS Nationwide Historic Context Study: Postal Facilities Constructed or Occupied Between 1940 and 1971, prepared by URS Group (Draft Report September 2012), accessed 11/5/18 at http://preservation.lacity.org/sites/default/files/USPSNationwideHistoricContextStudy_PostalFacilitiesConstructedOrOccupiedBetween1940and1971.pdf

achieved significance within the last fifty years, even though completion of the terminals overlaps the fifty year period by a few years.[8]

Conclusion

Based on the foregoing analysis and considerations, I recommend a finding that the MCI Airport is eligible for the National Register of Historic Places as a district under Criteria A and C, with a period of significance of 1957-1972.

This district would fully encompass the Direct APE for the subject undertaking, so delineating the precise boundaries and identifying contributing/non-contributing resources outside of the direct APE may not be necessary in order to assess the effect of the undertaking on the historic district.

[8] See National Register Bulletin: *How to Apply the National Register Criteria for Evaluation* at 41.

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Tener, Scott (FAA)

From: Halona Cabe <halona.clawson@ponca.com>
Sent: Friday, November 16, 2018 9:33 AM
To: Tener, Scott (FAA)
Subject: Re: Environmental Assessment for Proposed Replacement Terminal Project Kansas City International Airport, Kansas City, Platte County, Missouri

Yes we are interested in reviewing and being a signatory.

On Fri, Nov 16, 2018 at 9:32 AM <scott.tener@faa.gov> wrote:

> Ms. Cabe,
>
> We are preparing a Programmatic Agreement between the FAA, City of Kansas City, Missouri SHPO, the Osage Nation, Kaw Nation, and the Pawnee Nation. The PA will resolve adverse effects that the proposed Undertaking will have on the potential historic district. The PA will also include a plan for archeological monitoring of the construction sites within the direct APE, plan for unanticipated discovery of cultural resources, and a plan for unanticipated discovery of human remains.
>
> We plan on sending the PA out for review either today or early next week. Are you interested in reviewing the PA and would you like to be an Invited Signatory to the agreement?
>
> Please let me know if you have any questions,
>
> Scott Tener
>
> Environmental Specialist
>
> FAA Central Region Airports Division
>
> 901 Locust St., Room 364
>
> Kansas City, Missouri 64106-2325
>
> T 816.329.2639 | F 816.329.2611
>
> http://www.faa.gov/airports/central/

From: Tener, Scott (FAA)
Sent: Monday, October 22, 2018 11:03 AM
To: 'Halona Cabe' <halona.clawson@ponca.com>
Subject: RE: Environmental Assessment for Proposed Replacement Terminal Project Kansas City International Airport, Kansas City, Platte County, Missouri

As requested, we are overnighting a copy of the Draft Environmental Assessment for the Kansas City International Airport Passenger Terminal Project.

The Draft EA can also be downloaded from this link,

http://www.flykci.com/media/7707/kci-terminal-ea-section-106-review_draft_august-2018.pdf

To help in our preparation of the EA, we would appreciate your input (via mail or e-mail) at your earliest convenience or within thirty (30) days. If you have questions or require additional information, please contact me at 816-329-2639 or scott.tener@faa.gov.

Please let me know if you have any questions,

Scott Tener

Environmental Specialist

FAA Central Region Airports Division

901 Locust St., Room 364

Kansas City, Missouri 64106-2325

T 816.329.2639 | F 816.329.2611

http://www.faa.gov/airports/central/

From: Halona Cabe <halona.clawson@ponca.com>
Sent: Monday, October 22, 2018 9:36 AM
To: Tener, Scott (FAA) <scott.tener@faa.gov>
Subject: Environmental Assessment for Proposed Replacement Terminal Project Kansas City International Airport, Kansas City, Platte County, Missouri

Attached please find the tribal documents in regard to the above mentioned project. If you have any questions, please do not hesitate to contact me.

Halona Cabe

Tribal Historic Preservation Officer

121 White Eagle Drive

Ponca City, OK 74601

580-763-0120

halona.clawson@ponca.com

--

Halona Cabe

Tribal Historic Preservation Officer

121 White Eagle Drive

Ponca City, OK 74601

580-763-0120

halona.clawson@ponca.com

From: scott.tener@faa.gov
To: Chris Babb
Subject: FW: ACHP e106: Proposed Terminal Replacement Project at Kansas City International Airport, Platte County, MO
Date: Friday, November 16, 2018 1:02:36 PM
Attachments: Response from ACHP__mo.faa.terminal replacement project at kansas city international airport.np.30jan18.pdf
2009-SHPO approval ltr-Miller Plantation MOA, Walker and Hoy Not Eligible_11-20-2009.pdf
Kansas City - Response Letter from SHPO-Restart Consultation_12-19-17.pdf
Kansas City - Email to SHPO_Adverse Determination_9-5-13 .pdf
SHPO - Expanded KCI Determination of Eligiblity 8-21-13.pdf
Cemetery Location Map.pdf
Kansas City - Response Letter from SHPO-Archaeological Report_8-14-18.pdf
revised_11-2-18_e106-form-doc_Proposed Terminal Replacement Project_Kansas City International Airport_Platte County_Missouri.docx
revised_11-2-18_e106-form-doc_Exhibits.pdf
MCI FPO Findings Memo 11152018.pdf

FYI…

From: Tener, Scott (FAA)
Sent: Friday, November 16, 2018 10:59 AM
To: 'e106@achp.gov' <e106@achp.gov>
Cc: 'sstokely@achp.gov' <sstokely@achp.gov>
Subject: ACHP e106: Proposed Terminal Replacement Project at Kansas City International Airport, Platte County, MO

We are requesting confirmation that you do not wish to participate in the Section 106 consultation and development of a programmatic agreement between the Federal Aviation Administration, Missouri SHPO, the Kansas City Aviation Department, and Tribes. Please find attached revised e106 form and additional information.

Please let me know if you have any questions,

Scott Tener
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
http://www.faa.gov/airports/central/

From: Tener, Scott (FAA)
Sent: Friday, October 05, 2018 10:33 AM
To: 'e106@achp.gov' <e106@achp.gov>
Cc: 'sstokely@achp.gov' <sstokely@achp.gov>
Subject: FW: Proposed Terminal Replacement Project at Kansas City International Airport, Platte County, MO

From: Tener, Scott (FAA)
Sent: Tuesday, September 25, 2018 9:15 AM
To: 'sstokely@achp.gov' <sstokely@achp.gov>
Subject: FW: Proposed Terminal Replacement Project at Kansas City International Airport, Platte County, MO

Ms. Stokely,

After further consultation with the Missouri SHPO, it was decided that a Programmatic Agreement (PA) would be more appropriate than a MOA. We are currently in process of consulting on the PA with the Missouri SHPO, Osage Nation, Kaw Nation, and Pawnee Nation.

Since we changed from an MOA to a PA, the SHPO recommended that we coordinate with ACHP again to determine if you would like to be part of the PA consultation. Please let me know if you want to take part in the consultation.

Please let me know if you have any questions,

Scott Tener
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
http://www.faa.gov/airports/central/

From: OFAP <OFAP2@achp.gov>
Sent: Tuesday, January 30, 2018 12:07 PM
To: Tener, Scott (FAA) <scott.tener@faa.gov>
Cc: Toni Prawl <toni.prawl@dnr.mo.gov>; Andrus, Katherine (FAA) <Katherine.Andrus@faa.gov>; Sarah Stokely <sstokely@achp.gov>
Subject: Proposed Terminal Replacement Project at Kansas City International Airport, Platte County, MO

From: Office of Federal Agency Programs

Advisory Council on Historic Preservation

Attached is our letter on the subject undertaking (in Adobe Acrobat PDF format)

If you have any questions concerning our letter, please contact:

Sarah Stokely
sstokely@achp.gov
202 517-0224
Case # 12441

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U.S. Department
of Transportation

**Federal Aviation
Administration**

Central Region
Iowa, Kansas,
Missouri, Nebraska

901 Locust
Kansas City, Missouri 64106
(816) 329-2600

November 16, 2018

CERTIFIED MAIL

Dr. Toni M. Prawl
Director and Deputy State Historic Preservation Officer
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

SHPO Project Number: 007-PL-18
Section 106 Coordination
Environmental Assessment for Proposed Replacement Terminal Project
Kansas City International Airport
Kansas City, Platte County, Missouri

Dear Dr. Prawl:

Please find enclosed the draft Programmatic Agreement (PA) to resolve adverse effects associated with the proposed undertaking to replace the passenger terminals at the Kansas City International Airports with a single passenger terminal. Please also find enclosed FAA's finding that the Airport is eligible for the NRHP as a district under Criteria A and C, with a period of significance of 1957-1972.

We request your comments by December 14, 2018.

If you have any questions, please contact me at scott.tener@faa.gov or (816) 329-2639.

Sincerely,

Scott Tener, P.E.
Environmental Specialist

Enclosures: Draft Programmatic Agreement
FAA Memo, Review of Findings
Architectural and Historical Property Evaluation, October 2018

Cc: Jade Liska, Kansas City Aviation Department (no enclosures)
Chris Babb, Landrum & Brown (no enclosures)

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U.S. Department
of Transportation

**Federal Aviation
Administration**

Central Region
Iowa, Kansas,
Missouri, Nebraska

901 Locust
Kansas City, Missouri 64106
(816) 329-2600

November 16, 2018

CERTIFIED MAIL

Ms. Crystal Douglas
Tribal Historic Preservation Office
Kaw Nation
P.O. Box 50
Kaw City, OK 74641

Draft Programmatic Agreement
Section 106 Coordination
Environmental Assessment for Proposed Replacement Terminal Project
Kansas City International Airport
Kansas City, Platte County, Missouri

Dear Ms. Douglas:

Please find enclosed the draft Programmatic Agreement (PA) to resolve adverse effects associated with the proposed undertaking to replace the passenger terminals at the Kansas City International Airports with a single passenger terminal.

We request your comments by December 14, 2018.

If you have any questions, please contact me at scott.tener@faa.gov or (816) 329-2639.

Sincerely,

Scott Tener, P.E.
Environmental Specialist

Enclosures: Draft Programmatic Agreement

Cc: Jade Liska, Kansas City Aviation Department (no enclosures)
Chris Babb, Landrum & Brown (no enclosures)

U.S. Department
of Transportation

**Federal Aviation
Administration**

Central Region
Iowa, Kansas,
Missouri, Nebraska

901 Locust
Kansas City, Missouri 64106
(816) 329-2600

November 16, 2018

CERTIFIED MAIL

Dr. Andrea Hunter
Director, THPO
Osage Nation
627 Grandview
Pawhuska, OK 74056

Draft Programmatic Agreement
Section 106 Coordination
Environmental Assessment for Proposed Replacement Terminal Project
Kansas City International Airport
Kansas City, Platte County, Missouri

Dear Dr. Hunter:

Please find enclosed the draft Programmatic Agreement (PA) to resolve adverse effects associated with the proposed undertaking to replace the passenger terminals at the Kansas City International Airports with a single passenger terminal.

We request your comments by December 14, 2018.

If you have any questions, please contact me at scott.tener@faa.gov or (816) 329-2639.

Sincerely,

Scott Tener, P.E.
Environmental Specialist

Enclosures: Draft Programmatic Agreement

Cc: Jade Liska, Kansas City Aviation Department (no enclosures)
Chris Babb, Landrum & Brown (no enclosures)

U.S. Department
of Transportation

**Federal Aviation
Administration**

Central Region
Iowa, Kansas,
Missouri, Nebraska

901 Locust
Kansas City, Missouri 64106
(816) 329-2600

November 16, 2018

CERTIFIED MAIL

Mr. Matt Reed
Tribal Historic Preservation Office
Pawnee Nation of Oklahoma
P.O. Box 470
Pawnee, OK 74058

Draft Programmatic Agreement
Section 106 Coordination
Environmental Assessment for Proposed Replacement Terminal Project
Kansas City International Airport
Kansas City, Platte County, Missouri

Dear Mr. Reed:

Please find enclosed the draft Programmatic Agreement (PA) to resolve adverse effects associated with the proposed undertaking to replace the passenger terminals at the Kansas City International Airports with a single passenger terminal.

We request your comments by December 14, 2018.

If you have any questions, please contact me at scott.tener@faa.gov or (816) 329-2639.

Sincerely,

Scott Tener, P.E.
Environmental Specialist

Enclosures: Draft Programmatic Agreement

Cc: Jade Liska, Kansas City Aviation Department (no enclosures)
Chris Babb, Landrum & Brown (no enclosures)

U.S. Department
of Transportation

**Federal Aviation
Administration**

Central Region
Iowa, Kansas,
Missouri, Nebraska

901 Locust
Kansas City, Missouri 64106
(816) 329-2600

November 16, 2018

CERTIFIED MAIL

Ms. Halona Cabe
Tribal Historic Preservation Officer
Ponca Tribe of Indians of Oklahoma
121 White Eagle Drive
Ponca City, OK 74601

Draft Programmatic Agreement
Section 106 Coordination
Environmental Assessment for Proposed Replacement Terminal Project
Kansas City International Airport
Kansas City, Platte County, Missouri

Dear Ms. Cabe:

Please find enclosed the draft Programmatic Agreement (PA) to resolve adverse effects associated with the proposed undertaking to replace the passenger terminals at the Kansas City International Airports with a single passenger terminal.

We request your comments by December 14, 2018.

If you have any questions, please contact me at scott.tener@faa.gov or (816) 329-2639.

Sincerely,

Scott Tener, P.E.
Environmental Specialist

Enclosures: Draft Programmatic Agreement

Cc: Jade Liska, Kansas City Aviation Department (no enclosures)
Chris Babb, Landrum & Brown (no enclosures)

Tener, Scott (FAA)

Subject: Requesting consulting status for KCI Programmatic Agreement

From: Raab, L Mark <raabl@umkc.edu>
Sent: Thursday, December 06, 2018 10:58 AM
To: Andrus, Katherine (FAA) <Katherine.Andrus@faa.gov>
Cc: warren watkins <warrenwatkins@yahoo.com>; Bruce Watkins <brucewatkins007@gmail.com>; Ike Francis <ifrancis42@sbcglobal.net>; annmraab@gmail.com
Subject: Requesting consulting status for KCI Programmatic Agreement

Dear Ms. Andrus,

The Missouri SHPO notified us yesterday that the FAA is preparing a Programmatic Agreement (PA) for Kansas City International Airport's (KCIA) proposed terminal replacement project. The Watkins Foundation of Kansas City, Missouri is respectfully requesting consulting status in the PA. The Watkins Foundation is a non-profit educational organization dedicated to preserving and educating the public about African American history and culture. Principals of the Watkins Foundation, Warren and Bruce Watkins, are descendants of African Americans enslaved on 19th farms, which survive today as documented KCIA archaeological and historical sites. The airport's 53-square-miles of land is an historic cultural landscape for the Watkins and other families, black and white, as documented in our previous comments to your office about the airport's pending Environmental Assessment and Section 106 study. We hope that the FAA will allow voices from these communities to play a role in the PA.

Thank you sincerely for your time and consideration,

Mark Raab
For the Watkins Foundation,
Kansas City, Missouri

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Tener, Scott (FAA)

From: Tener, Scott (FAA)
Sent: Wednesday, December 12, 2018 3:04 PM
To: 'Raab, L Mark'; Andrus, Katherine (FAA)
Cc: warren watkins; Bruce Watkins; Ike Francis; annmraab@gmail.com
Subject: RE: Recommendations for KCI archaeological monitoring plan
Attachments: PA for KCI Terminal Project_Revised 12-5-18.pdf

Mr. Raab,

We are finalizing the Programmatic Agreement and expect it to be ready for signature early next week. Please find attached a draft of the PA for your information. If the Watkins Foundation wishes, they may sign the final PA as a concurring party pursuant to 36 CFR 800.6 (c) (3).

Please let me know if you have any questions,

Scott Tener
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
http://www.faa.gov/airports/central/

From: Raab, L Mark <raabl@umkc.edu>
Sent: Friday, December 07, 2018 3:48 PM
To: Andrus, Katherine (FAA) <Katherine.Andrus@faa.gov>; Tener, Scott (FAA) <scott.tener@faa.gov>
Cc: warren watkins <warrenwatkins@yahoo.com>; Bruce Watkins <brucewatkins007@gmail.com>; Ike Francis <ifrancis42@sbcglobal.net>; annmraab@gmail.com; Andrea Hunter <ahunter@osagenation-nsn.gov>; jreed@pawneenation.org
Subject: Recommendations for KCI archaeological monitoring plan

Dear Ms. Andrus and Mr. Tener,

It's our understanding that the FAA is preparing a Programmatic Agreement (PA) for Kansas City International Airport, including provisions for an Unanticipated (Archaeological) Discovery Plan. Please consider including our attached recommendations in the PA. If you have questions, please contact us.

Do you have an estimated date when the PA will be completed?

Thanks so much for your consideration,

Mark Raab
For the Watkins Foundation,
Kansas City, Missouri

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Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Michael L. Parson, Governor
Carol S. Comer, Director

December 19, 2018

Ms. Cydney Millstein
Architectural & Historical Research, LLC
1537 Belleview Ave
Kansas City, MO 64108

Re: **SHPO Project Number: 007-PL-13** Documentation Submitted per Draft Programmatic Agreement for the Terminal Replacement Project and the Demolition of Terminals A, B, and C at Kansas City International Airport, 601 Brasilia Avenue, Kansas City, Platte, Missouri (FAA)

Dear Ms. Millstein:

We have received the photographic documentation as stipulated in the draft programmatic agreement (PA) for the above-referenced project which is being developed pursuant to Section 106 of the National Historic Preservation Act (P.L. 89-665, as amended) and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800. The submission of these photographs meets the requirements of Stipulation VII and Attachment 7 of the draft PA. Due to the need for the City and Kansas City's Aviation Department (KCAD) to coordinate the acceptance of these images with the execution of the agreement we have agreed to accept the photographs in advance of the execution of the agreement document. Therefore, as outlined in 4 of Attachment 7 of the PA, we find the photographic documentation acceptable and demolition of Terminal A may begin upon execution of the agreement document. **We look forward to executing the PA and continuing to consult with the FAA and KCAD on the development of the construction monitoring plan and additional mitigation measures as outlined in the PA.**

If you have any questions please write Missouri Department of Natural Resources, State Historic Preservation Office, Attn: Review and Compliance, P.O. Box 176, Jefferson City, Missouri 65102, or call Amanda Burke (573) 522-4641.

Recycled paper

Please be sure to include the **SHPO Project Number (007-PL-13)** on all future correspondence relating to this project. If the information is provided via telephone call, please follow up in writing for our files.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Toni M. Prawl

Toni M. Prawl, PhD
Director and Deputy
State Historic Preservation Officer

TMP:ab

c: Mr. Scott Tener, FAA
Mr. Chris Babb, Landrum & Brown
Mr. Pat Klein, KCMO
Ms. Jade Liska, KCMO

Federal Aviation Administration

Memorandum

Date: December 21, 2018

To: Jim Johnson, Director, Central Region Airports Division (ACE-600)

From: Katherine Andrus, Federal Preservation Officer (AEE-400)

Subject: Review of Findings Under Section 106 for the Kansas City International Airport Terminal Replacement Project –Eligibility of Resources in the Indirect APE

In response to comments received on the Draft EA, I have assessed the National Register eligibility of the area within the areas of potential effect (APE) as a Traditional Cultural Property (TCP).[1] I reviewed the *Architectural and Historical Property Evaluation* prepared by KCAD's consultant, Architectural & Historical Research, LLC, in October 2018; National Register Bulletin *Guidelines for Evaluating and Documenting Traditional Cultural Properties*; and public comments pertaining to historic properties potentially affected by the undertaking and people who identify as having connections with the history of this area. The following assessment is informed by these materials, consultation with the Missouri SHPO, and my experience and training in the field of historic preservation.

TCPs are historic properties which, in addition to meeting one or more of the National Register eligibility criteria, are directly associated with cultural practices or beliefs of a living community that are rooted in that community's history and important in maintaining the continuing cultural identity of the community. The TCP must be a tangible property (i.e., a district, site, building, structure, or object), and must also retain integrity (i.e., the ability to convey that significance through location, design, setting,

[1] For this undertaking, the FAA defined two APEs – the area physically affected by demolition of the existing terminals and construction of the replacement terminals (the Direct APE) and a wider area that could be affected by the introduction of atmospheric, auditory or visual features as a result of the undertaking (the Indirect APE). My memorandum of November 15, 2018 only addressed resources within the Direct APE.

materials, workmanship, feeling, and association). The TCP's significance "is derived from the role the property plays in a community's historically rooted beliefs, customs and practices."[2]

The commenters advocate recognition of a historic district encompassing farms associated with the expansion of slavery into western territories, the Missouri-Kansas Border War and the American Civil War.[3] The property within the Indirect APE includes documented archaeological sites linked to known slave-owning farmers and their slaves, private family cemeteries and potential unmarked burial sites,[4] sites of numerous houses and structures associated with 19th century farms and elements of a rural vernacular landscape.[5]

The commenters cite long-standing oral and documentary histories and traditions that link this community to airport property, including the land on which the current terminal complex was built:

> An extraordinarily detailed picture of ante-bellum slave-owing society on the Missouri frontier emerges from this research, including substantial sub-surface architectural remains and a wide range of artifacts associated with life on wealthy, slave-owning hemp plantations of Missouri's Little Dixie. Historical research on these sites shows a high degree of inter-marriage by the farms' slave owners, and likely their slaves. *There is no question that the tightly-knit social networks among slave owners and their slaves formed a cultural landscape, and one of the most documented of its kind in Missouri, and on the larger mid-19th century American frontier.*[6]

[2] National Register of Historic Places, Guidelines for Evaluating and Documenting Traditional Cultural Properties (1998), at 1.

[3] The commenters note that this area is within the Freedom's Frontier National Heritage Area, which comprises 29 eastern Kansas and 12 western Missouri counties. http://www.freedomsfrontier.org/

[4] Local families reportedly continue to visit these cemeteries. In 2008-2009, descendants of people known to be buried in these cemeteries, along with descendants of slaves who may have been buried in unmarked graves in and around these cemeteries, successfully opposed a petition by the City of Kansas City to disinter and move human remains to another site on airport property. The Court noted that the cemeteries are maintained by distant family members of the decedents buried in the cemeteries. In Re: The Matter of The Removal of Human Remains from Cemeteries in Kansas City, No. WD 70006 (Mo. Ct. App. WD Nov. 10, 2009) available at https://caselaw.findlaw.com/mo-court-of-appeals/1496223.html

[5] According to archival research undertaken at the request of the Watkins Foundation by Dr. Dawn Stricklin, Columbia College, at one time least 30 slave-owning farms existed on what is now airport property.

[6] KCI Traditional Cultural Property, Comments on Environmental Assessment and Section 106 Evaluation, Replacement Terminal, Kansas City International Airport, Draft-August 2018, submitted by the Watkins Foundation, Kansas City, Missouri, September 29, 2018 (emphasis in original).

According to the commenters, this district would qualify as a TCP based on the continuing importance of the district to descendants of the 19th century inhabitants of this area – enslaved African Americans and Euro-American slave owners – who form a traditional community united in their efforts to preserve cultural history.[7] A group of these descendants attended the September 24, 2018 public workshop on the pending EA and Section 106 report for the terminal project.[8]

The National Register defines TCPs as places associated with identifiable cultural practices shared by a living, traditional group that existed historically and continues to exist today, rooted in the group's history and passed down through the generations as a means of maintaining the continuing cultural identity and values of the group. Although the descendants' commitment to preservation of their history is commendable, it is not clear that these descendants form a traditional group as that term is used in the National Register program, or that this group shares cultural practices, customs or beliefs that are rooted in their history and continue to be held or practiced today. This does not in any way diminish the historic significance of this area or its current importance to the descendants of its 19th century inhabitants; however, more information would be needed to establish that this group's association with this area meets the National Register criteria for a TCP.

In evaluating the eligibility of a potential TCP, it is also necessary to define the extent and characteristics of the historic property associated with the traditional community. In this case, it appears that a potential historic district reflecting the 19th century agricultural development of the area, its ties to slavery, and pre- and post-Civil War relations between Euro-American farm owners and African-Americans might include some or all of the approximately 11,000 acres owned by KCAD, as well as contiguous or non-contiguous areas under other ownership.[9] The level of effort required to delineate boundaries and fully evaluate such a potential district – which would appropriately include cultural landscape features such as field divisions, roads and plantings, as well as buildings, structures and archeological sites – would be substantial. Although no doubt worthwhile, this would far exceed the reasonable and good faith identification effort required for Section 106 review of the terminal project.

[7] Among the descendants who may be significant in their own right are Bruce R. Watkins, first black City Council Member and civil rights leader, who traced his family to slaves of Matthew Hughes, and Dr. Jimmy Johnson III, an African American archaeologist who originally excavated the Miller Plantation and who was the great-great grandson of George Washington, a slave who ran away from the Miller Farm and joined the Kansas Colored First Infantry Regiment.

[8] See The Kansas City Globe, Sept. 27, 2018.

[9] Review of aerial photographs indicates larges areas of minimally-developed rural land surrounding the airport which could be included in this historic district.

However, based on what we already know about the potential basis for such a district, it is not necessary to make a determination regarding its eligibility at this time. Even assuming the existence of a historic district that encompassed some or all of the airport property, the terminal complex, airfield and ancillary structures do not retain integrity as a 19th century rural landscape and would either be excluded from its boundaries or considered non-contributing resources. Therefore, there would be no effects to this potential district within the Direct APE. The noise and visual impacts of the undertaking would not differ in character from what currently exists, and therefore there would be no effects to this potential district in the Indirect APE. Based on this analysis, there is no need to evaluate the eligibility of such a district as a TCP.

From: scott.tener@faa.gov
To: ahunter@osagenation-nsn.gov; jreed@pawneenation.org; crystal_douglas@kawnation.com; halona.clawson@ponca.com; Toni.Prawl@dnr.mo.gov; jim.johnson@faa.gov; Pat.Klein@kcmo.org
Cc: jwmunkres@osagenation-nsn.gov; jfox@osagenation-nsn.gov; rodney.joel@faa.gov; Heather.Gibb@dnr.mo.gov; Amanda.Burke@dnr.mo.gov; Chris Babb; Jade.Liska@kcmo.org
Subject: Executable Final Programmatic Agreement: KCI Terminal Replacement, Platte County, MO
Date: Friday, December 28, 2018 10:18:22 AM
Attachments: PA for KCI Terminal Project_122718_Final.pdf

Please find attached the executable Final PA revised per all comments received. All the Parties to the agreement can sign and just send back the signature page. We will then send out a fully executed copy with all the signatures in both PDF and hard copy format.

Please let me know if you require a hard copy of this Final PA for signature and I will have one overnighted to you.

Please let me know if you have any questions or need any additional information,

Scott Tener
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
http://www.faa.gov/airports/central/

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Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Michael L. Parson, Governor
Carol S. Comer, Director

JAN 0 2 2019

Mr. Scott Tener
FAA Central Region Airports Division
901 Locust St, Room 364
Kansas City, MO 64106-2325

Re: **SHPO Project No.: 007-PL-13**, Programmatic Agreement for the Terminal Replacement Project and the Demolition of Terminals A, B, and C at Kansas City International Airport, 601 Brasilia Avenue, Kansas City, Platte, Missouri (FAA)

Dear Mr. Tener:

Thank you for submitting the above-referenced Programmatic Agreement (PA) for our review and signature, pursuant to Section 106 of the National Historic Preservation Act (P.L. 89-665, as amended). We find the terms of the agreement acceptable and have signed our concurrence; however, upon final review of the PA we noted that Attachment 5.8 referenced the National Park Services' (NPS) Standards for Historic Vessel Preservation instead of 36 CFR Part 79 Curation of Federally-Owned and Administered Archaeological Collections. While we do not feel that this statement warrants the revisal of the PA, we recommend that should materials, such as artifacts or samples, be collected (as referenced in Attachment 5.8 pg. 30 of the PA) then the artifact preservation and management should be discussed by all consulting parties. At that time, instead of using the NPS Standards for Historic Vessel Preservation Projects, as referenced, we recommend that artifacts/collections should be housed in facilities that administer and curate collections according to 36 CFR Part 79: Curation of Federally-Owned and Administered Archaeological Collections.

In a letter from our office dated December 19, 2018, our office accepted the photographs as outlined in Stipulation VII and Attachment 7 of the PA; therefore, the demolition of Terminal A may begin upon execution of the agreement document by all parties.

Once the document is fully executed, please forward one copy to the Advisory Council on Historic Preservation, and email a .pdf copy of the agreement to this office for our files.

If you have any questions please write Missouri Department of Natural Resources, State Historic Preservation Office, Attn: Review and Compliance, P.O. Box 176, Jefferson City, Missouri 65102, or call Amanda Burke (573) 522-4641.

Recycled paper

Please be sure to include the **SHPO Project Number (007-PL-13)** on all future correspondence relating to this project. If the information is provided via telephone call, please follow up in writing for our files.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Toni M. Prawl

Toni M. Prawl, PhD
Director and Deputy
State Historic Preservation Officer

TMP:ab

encl: one copy of PA signature page

c: Mr. Chris Babb, Landrum & Brown
Mr. Pat Klein, KCMO
Ms. Jade Liska, KCMO

Tener, Scott (FAA)

From: Tener, Scott (FAA)
Sent: Wednesday, January 02, 2019 9:55 AM
To: 'Raab, L Mark'; Andrus, Katherine (FAA)
Cc: warren watkins; Bruce Watkins; Ike Francis; annmraab@gmail.com
Subject: RE: Public meeting dates for KCI Programmatic Agreement
Attachments: PA for KCI Terminal Project_122718_Final.pdf

Mr. Raab,

Please find attached the final Programmatic Agreement taking your comments under consideration. Please let us know if the Watkins Foundation would like to sign this agreement as a concurring party pursuant to 36 CFR 800.6 (c) (3).

Scott Tener
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
http://www.faa.gov/airports/central/

From: Raab, L Mark <raabl@umkc.edu>
Sent: Thursday, December 27, 2018 6:58 AM
To: Tener, Scott (FAA) <scott.tener@faa.gov>; Andrus, Katherine (FAA) <Katherine.Andrus@faa.gov>
Cc: warren watkins <warrenwatkins@yahoo.com>; Bruce Watkins <brucewatkins007@gmail.com>; Ike Francis <ifrancis42@sbcglobal.net>; annmraab@gmail.com
Subject: Public meeting dates for KCI Programmatic Agreement

Dear Mr. Tener,

What are the dates and places of public meetings for comments on the Programmatic Agreement for the KCI terminal modernization project?

Thanks for your assistance,
Mark Raab
For the Watkins Foundation,
Kansas City, Missouri

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Tener, Scott (FAA)

From: Tener, Scott (FAA)
Sent: Monday, January 14, 2019 8:49 AM
To: Tener, Scott (FAA)
Subject: FW: ACHP e106: Proposed Terminal Replacement Project at Kansas City International Airport, Platte County, MO
Attachments: Response from ACHP_ mo.faa.terminal replacement project at kansas city international airport.np.30jan18.pdf; 2009-SHPO approval ltr-Miller Plantation MOA, Walker and Hoy Not Eligible_11-20-2009.pdf; Kansas City - Response Letter from SHPO-Restart Consultation_12-19-17.pdf; Kansas City - Email to SHPO_Adverse Determination_ 9-5-13 .pdf; SHPO - Expanded KCI Determination of Eligiblity 8-21-13.pdf; Cemetery Location Map.pdf; Kansas City - Response Letter from SHPO-Archaeological Report_ 8-14-18.pdf; revised_11-2-18_e106-form-doc_Proposed Terminal Replacement Project_Kansas City International Airport_Platte County_Missouri.docx; revised_11-2-18 _e106-form-doc_Exhibits.pdf; MCI FPO Findings Memo 11152018.pdf

To File,

As of to date, ACHP has not responded to the 2nd request to participate in Section 106 consultation and development of a programmatic agreement.

Please let me know if you have any questions,

Scott Tener
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
http://www.faa.gov/airports/central/

From: Tener, Scott (FAA)
Sent: Friday, November 16, 2018 10:59 AM
To: 'e106@achp.gov' <e106@achp.gov>
Cc: 'sstokely@achp.gov' <sstokely@achp.gov>
Subject: ACHP e106: Proposed Terminal Replacement Project at Kansas City International Airport, Platte County, MO

We are requesting confirmation that you do not wish to participate in the Section 106 consultation and development of a programmatic agreement between the Federal Aviation Administration, Missouri SHPO, the Kansas City Aviation Department, and Tribes. Please find attached revised e106 form and additional information.

Please let me know if you have any questions,

Scott Tener
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
http://www.faa.gov/airports/central/

From: Tener, Scott (FAA)
Sent: Friday, October 05, 2018 10:33 AM
To: 'e106@achp.gov' <e106@achp.gov>
Cc: 'sstokely@achp.gov' <sstokely@achp.gov>
Subject: FW: Proposed Terminal Replacement Project at Kansas City International Airport, Platte County, MO

From: Tener, Scott (FAA)
Sent: Tuesday, September 25, 2018 9:15 AM
To: 'sstokely@achp.gov' <sstokely@achp.gov>
Subject: FW: Proposed Terminal Replacement Project at Kansas City International Airport, Platte County, MO

Ms. Stokely,

After further consultation with the Missouri SHPO, it was decided that a Programmatic Agreement (PA) would be more appropriate than a MOA. We are currently in process of consulting on the PA with the Missouri SHPO, Osage Nation, Kaw Nation, and Pawnee Nation.

Since we changed from an MOA to a PA, the SHPO recommended that we coordinate with ACHP again to determine if you would like to be part of the PA consultation. Please let me know if you want to take part in the consultation.

Please let me know if you have any questions,

Scott Tener
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
http://www.faa.gov/airports/central/

From: OFAP <OFAP2@achp.gov>
Sent: Tuesday, January 30, 2018 12:07 PM
To: Tener, Scott (FAA) <scott.tener@faa.gov>
Cc: Toni Prawl <toni.prawl@dnr.mo.gov>; Andrus, Katherine (FAA) <Katherine.Andrus@faa.gov>; Sarah Stokely <sstokely@achp.gov>
Subject: Proposed Terminal Replacement Project at Kansas City International Airport, Platte County, MO

From: Office of Federal Agency Programs

Advisory Council on Historic Preservation

Attached is our letter on the subject undertaking (in Adobe Acrobat PDF format)

If you have any questions concerning our letter, please contact:

Sarah Stokely
sstokely@achp.gov
202 517-0224
Case # 12441

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Tener, Scott (FAA)

From: Crystal Douglas <crystal_douglas@kawnation.com>
Sent: Tuesday, January 15, 2019 4:13 PM
To: Tener, Scott (FAA)
Cc: lwilliams@kawnation.com
Subject: KCIA restoration (PA)

I have completed the review of all the documents you have sent to the Kaw Nation in regards to the Section 106 compliance of the Kansas City International Airport restoration and expansion project. I have spoken to my Chairman Lynn Williams and we have decided to hold off on signing the PA at this time. I would like to assure you that we are in support of this project to move forward and we feel that we can still rely on your support of the Laws of NAGPRA, NEPA, ARPA and Section 106. Please keep us informed as the project moves forward and please give us an update on the issue with the cemetery that has been addressed by the group represented by Leonard Reeb. I feel that this issue is not going to be resolved right away. I do agree that what I have seen I feel comfortable in my consideration to support the project. I have sent a letter in the mail with this information and my signature in order for you to begin; thank you I will be in touch.

Crystal Douglas
THPO/Kansa Museum Director
Kaw Nation
P.O. Box 50
Kaw City, Oklahoma 74641
580-269-2552
crystal_douglas@kawnation.com

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PROGRAMMATIC AGREEMENT
AMONG
THE FEDERAL AVIATION ADMINISTRATION,
MISSOURI STATE HISTORIC PRESERVATION OFFICE,
THE CITY OF KANSAS CITY, MISSOURI,
KAW NATION, OSAGE NATION, PAWNEE NATION,
AND THE PONCA TRIBE OF OKLAHOMA
IMPLEMENTING
SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR
THE PROPOSED TERMINAL REPLACEMENT PROJECT AND THE
DEMOLITION OF TERMINALS A, B, AND C AT
KANSAS CITY INTERNATIONAL AIRPORT
KANSAS CITY, PLATTE COUNTY, MISSOURI

WHEREAS, as part of the Section 106 consultation process, this Programmatic Agreement (PA) has been developed, pursuant to 36 CFR 800.14(b), to govern the resolution of adverse effects associated with the proposed Undertaking on historic properties, as described below, and fulfillment of the Signatories' responsibilities under Section 106. The PA was utilized in this situation to govern the resolution of adverse effects due to the complex project situations and multiple undertakings; and

WHEREAS, the Federal Aviation Administration (FAA) is the lead Federal agency for compliance with Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. 470f) and is considering the City of Kansas City, Missouri's (City) requests (1) to approve the proposed revisions to the Airport Layout Plan for Kansas City International Airport (KCI) pursuant to 49 U.S.C. §§40103 and 47107; and (2) relating to potential eligibility for funding pursuant to 49 U.S.C. §§47106 and 47107 and/or 49 U.S.C. §40117; and

WHEREAS, the City, by and through its Kansas City Aviation Department (KCAD), proposes the following developments (Undertaking) (illustrated in **Attachment 1**) at KCI and is considered a Signatory to this PA due to the nature of their legal and economic relation to the proposed Undertaking:

- Demolish existing Terminal A, which is currently vacant, including the Terminal A parking garage and aircraft apron;
- Construct a new replacement terminal and provide updated utilities including water lines;
- Construct a new parking garage and surface parking lot;
- Construct new terminal apron area around the replacement terminal including providing new fuel hydrants;
- Modify existing roadways and construct new roadways in the terminal area;
- Construct various storm water collection system improvements including improved glycol recovery system (deicing) and facilities;
- Construct replacement Central Utility Plant (CUP) and provide redundant electrical underground electrical power utility feed;
- Resurface and rehabilitate the taxiways in the vicinity of the replacement terminal;

- Consolidate airline operations at the new replacement terminal, decommission, and demolish existing Terminals B and C (Terminals B and C would remain open during construction of the new terminal). The Terminal B and C parking lots would remain operational for employee parking and/or customer parking and the existing aircraft aprons would be used for aircraft deicing; and

WHEREAS, the FAA; the City, by and through its KCAD; and the Missouri State Historic Preservation Office (SHPO) are Signatories to this PA due to the nature of their legal and economic relation to the proposed Undertaking; and

WHEREAS, the FAA has provided opportunity for the Iowa Tribe of Oklahoma, Kaw Nation, Miami Tribe of Oklahoma, Omaha Tribe, Osage Nation, Pawnee Nation, Ponca Tribe of Nebraska, Ponca Tribe of Oklahoma, and Yankton Sioux Tribe of South Dakota to consult on the proposed Undertaking's potential to affect properties with religious and cultural significance; and

WHEREAS, the FAA, SHPO, and KCAD recognize that the Tribes possess the knowledge, experience, and oral tradition to identify and evaluate historic properties of traditional, religious, and cultural importance; and

WHEREAS, the Kaw Nation, the Osage Nation, the Pawnee Nation, and the Ponca Tribe of Oklahoma (Tribes) have accepted the invitation to participate in the consultation and have been invited to sign this PA as Invited Signatories; and

WHEREAS, the Signatories and Invited Signatories to this PA are collectively known as the Parties to this PA; and

WHEREAS, the FAA has defined the project's Area of Potential Effects (APE) in accordance with 36 CFR 800.16(d), for direct effects and indirect effects (illustrated in **Attachment 2**) and SHPO and the Tribes have concurred; and

WHEREAS, KCAD has conducted two surveys of the direct APE; 1) *Phase I Archeological Survey, Kansas City International Airport Archeological Services, Platte County, Missouri,* July 2018, to document the presence or absence of significant archaeological/cultural resources, and 2) *Kansas City International Airport Architectural and Historical Property Evaluation for the Proposed Replacement Terminal Project,* October 2018, to identify contributing/non-contributing buildings and structures in the potential historic district; and

WHEREAS, no prehistoric or historic artifacts were encountered during the archaeological survey within the direct APE; and

WHEREAS, in conducting the archaeological survey, the Principal Investigator determined that there were areas that would not be appropriate for shovel testing or deep testing in the direct APE and identification efforts could not be completed in advance of implementation of the proposed Undertaking due to the fact that subsurface investigations were prevented by the presence of existing infrastructure, e.g., concrete aprons, etc.; and

WHEREAS, the FAA determined that no known archeological resources would be affected in the direct APE and the SHPO concurred; and

WHEREAS, the FAA, in consultation with the SHPO has evaluated the eligibility of the historic district for listing in the National Register of Historic Places (NRHP) within the APE; and

WHEREAS, the FAA has determined, and the SHPO has concurred, that the KCI Airport is eligible for the NRHP as a district significant under Criterion A in the area of Transportation for its association with the Jet Age and with Kansas City's efforts to retain TWA as a major employer in the region and under Criterion C in the area of architecture as a work of the prominent Kansas City architectural firm of Kivett and Myers embodying distinctive characteristics of the Brutalist architectural style and for its innovative "Drive-to-the-Gate" configuration, with a period of significance of 1957-1972; and

WHEREAS, the historic district for the proposed Undertaking, includes the airfield, the terminals, the Airport Police station and Central Chilling Plant located in the center of the terminal complex, associated access roads, and the earthen dam and draining control reservoir; and

WHEREAS, the FAA has determined that the proposed Undertaking will have an adverse effect on the historic district and has consulted with the SHPO pursuant to 36 CFR part 800 of the regulations implementing Section 106 of the NHPA (54 U.S.C. §306108); and

WHEREAS, the FAA has determined that there are no alternatives that completely avoid or minimize the adverse effect to the historic district due to current and future aeronautical needs; and

WHEREAS, in accordance with 36 CFR §800.6(a)(1), the Advisory Council on Historic Preservation (ACHP) has been provided the required documentation and invited to participate in this PA by the FAA and the ACHP chose not to participate in the consultation pursuant to 36 CFR §800.6(a)(1)(iii); and

WHEREAS, the public was afforded the opportunity to review and comment on the proposed Undertaking. Scoping meetings for agencies and the public were held on March 15, 2018 to provide an opportunity to comment on the scope of environmental issues to be addressed. Notices of the opportunities to comment on the *Draft Environmental Assessment (EA) and Section 106 Evaluation for the Replacement Terminal at Kansas City International Airport* (Draft EA) and the *Draft Section 4(f) Statement* were published in the Kansas City Star newspaper and were sent to governmental agencies and other parties who expressed interest in commenting on the proposed Undertaking. The Draft EA was released for public review and open to comment from August 23, 2018 to October 2, 2018. The Draft Section 4(f) Statement was released for public review and open to comment from September 10, 2018 to October 10, 2018. A Public Hearing was conducted on September 24, 2018; and

WHEREAS, the FAA has considered the views of the public and the Parties to the PA and has reviewed all the comments received by the close of the comment period for the Draft EA and Draft Section 4(f) Statement and will provide responses in the Final EA; and

WHEREAS, all Parties to the PA agree that once this PA is executed and the FAA approves the Undertaking, the City may proceed with demolition of Terminal A and construction of the proposed replacement terminal upon compliance with Stipulations IV and VII; and

WHEREAS, the Parties to the PA agree that the City may only proceed with demolition of Terminal B and Terminal C upon compliance with Stipulation VIII; and

WHEREAS, the FAA will submit an executed copy of this PA pursuant to 36 CFR 800.11(f), to the ACHP; and

NOW, THEREFORE, the FAA; the SHPO; the City, by and through its KCAD; the Kaw Nation; the Osage Nation; the Pawnee Nation; and the Ponca Tribe of Oklahoma agree that the proposed Undertaking shall be carried out in accordance with the following stipulations in order to address any unknown archaeologic or cultural resources and resolve the adverse effect of the proposed Undertaking on the historic district.

STIPULATIONS

If the FAA issues a determination approving the proposed Undertaking as described in the Environmental Assessment, Section 4(f) Statement, and Section 106 evaluation, the FAA, in coordination with the SHPO, the City, and the Tribes will ensure that the following mitigation measures are carried out:

I. APPLICABILITY

This PA establishes procedures for consultation and coordination among the FAA, the SHPO, KCAD, and the Tribes for compliance with Section 106 of the NHPA regarding the proposed Undertaking. This PA also establishes the mitigation measures that must be completed to resolve the adverse effects of the proposed Undertaking.

II. ROLES AND RESPONSIBILITIES

A. The director of the FAA Central Region, Airports Division is the Federal agency official responsible for compliance with this PA.

B. The FAA will ensure that its personnel or individuals carrying out historic preservation compliance work on its behalf meet the Secretary of the Interior's *Professional Qualification Standards* (36 CFR Part 61) and have the knowledge to assess the resources within the Undertaking's APE.

C. The FAA is responsible for consultation with the Tribes. This responsibility may not be carried out on behalf of the FAA by another entity. However, routine coordination, such as work activities and daily reports, may be carried out by KCAD and their consultants, on the FAA's behalf.

D. The FAA remains responsible for all determinations of NRHP eligibility and effect. The FAA may not delegate consultation for findings and determinations to professional services consultants.

III. COMMUNICATION

A. The FAA, SHPO, and KCAD agree to maintain the confidentiality of information pertaining to historic properties of traditional religious or cultural importance to the Tribes.

B. Project correspondence related to compliance with the stipulations in this PA will be submitted to the FAA, SHPO, KCAD, and the Tribes concurrently.

C. The FAA, SHPO, KCAD, and the Tribes shall each designate a consultation representative. The points of contact for each is provided in **Attachment 3**. Changes to the consultation representatives will be provided to the FAA, SHPO, KCAD, and the Tribes within seven (7) calendar days of such change.

IV. CONSTRUCTION MONITORING

KCAD will have a professional archaeologist who meets the Secretary of Interior's *Professional Qualification Standards* present to conduct construction monitoring during certain ground disturbing activities associated with the proposed Undertaking. The FAA, SHPO, KCAD, and the Tribes agree to adhere to the Plan for Construction Monitoring as provided in **Attachment 4**.

V. UNANTICIPATED DISCOVERIES OF CULTURAL RESOURCES AND ARTIFACTS

In the event that previously unreported and unanticipated cultural resource sites or artifacts are encountered during construction of the proposed Undertaking, KCAD will ensure that the proposed Undertaking is in compliance with all applicable Federal and state laws and regulations, including Section 106 of the NHPA. The FAA, SHPO, KCAD, and the Tribes agree to adhere to the Plan for Unanticipated Discoveries of Cultural Resources Sites and Artifacts as provided in **Attachment 5.**

VI. INADVERTENT DISCOVERIES OF HUMAN REMAINS, FUNERARY OBJECTS, SACRED OBJECTS, AND OBJECTS OF CULTURAL PATRIMONY

The respectful treatment of human remains and burial furniture is a paramount concern to the FAA, the SHPO, KCAD, the Tribes, and the local community. Should KCAD personnel, contractors, or other individuals fail to report a post-review discovery of human remains, they may be subject to penalties under the Missouri unmarked human burial law (Missouri Revised Statute 194.400–410) and under the Missouri public and private cemeteries human burial law (Missouri Revised Statute §214). These, and other laws, protect and provide consultation procedures for addressing impacts to, and discoveries of, human remains and graves on private lands within the State of Missouri. In the event of an inadvertent discovery of human

remains, even if such remains are in fragmentary form, the FAA, SHPO, KCAD, and the Tribes agree to adhere to the Plan for Inadvertent Discoveries of Human Remains, Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony as provided in **Attachment 6**.

VII. PHOTOGRAPHIC RECORD OF TERMINAL A

Prior to the demolition of Terminal A, KCAD will create a photographic record of Terminal A in accordance with the National Register Photo Policy Standards. The SHPO will consult on the selection of images to be printed for archival purposes. The FAA, SHPO, and KCAD agree to adhere to the Plan for Photographic Record of Terminal A as provided in **Attachment 7**. The photographic record of Terminal A does not need to be completed concurrently with Stipulation VIII.

VIII. ADDITIONAL MITIGATION MEASURES

In recognition of the loss of integrity that would render the historic district ineligible for the NRHP as a consequence of the demolition of the terminal complex, additional mitigation measures will be developed to fully resolve the adverse effects of the proposed Undertaking. Once selected, the mitigation measures must be complete before the City may implement the remainder of the proposed Undertaking, specifically the demolition of Terminal B and Terminal C (anticipated by 2022). The FAA, SHPO, and KCAD agree to adhere to the Plan for Additional Mitigation Measures as provided in **Attachment 8**. These additional mitigation measures may be completed after Terminal A is demolished and the new replacement terminal is constructed.

IX. MONITORING AND REPORTING

Each year following the Effective Date of this PA until it expires or is terminated, KCAD will provide to the FAA, the SHPO, and Tribes a summary status report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in the efforts to carry out the terms of this PA. The report will be submitted electronically and hardcopy via regular mail to the FAA, the SHPO, and Tribes. The timeframe for the annual report shall commence from the Effective Date of this PA.

X. EFFECTIVE DATE AND DURATION

A. This PA will be effective on the date the last Signatory signs the PA.

B. This PA will expire if its terms are not carried out within five (5) years from the Effective Date. Prior to expiration of the PA, the Signatories shall consult to reconsider the terms of the PA and amend it in accordance with Stipulation XII.

XI. DISPUTE RESOLUTION

Should any Party to the PA provide written objection at any time to any actions proposed, or the manner in which the terms of this PA are implemented, FAA shall consult with the objecting party to resolve the objection. If, after initiating such consultation FAA determines that the objection cannot be resolved through consultation, FAA shall:

A. Forward all documentation relevant to the dispute, including FAA's proposed resolution, to the ACHP with a copy to the other Parties to this PA and request that the ACHP provide FAA with its advice on the resolution of the objection within thirty (30) calendar days of receiving adequate documentation. All Parties shall be given fifteen (15) calendar days to provide FAA its comments on any advice provided by the ACHP. Prior to reaching a final decision on the dispute, FAA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from each Party and provide the Parties and the ACHP with a copy of this written response. FAA will then proceed according to its final decision.

B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) calendar day time period, FAA may make a final decision on the dispute and proceed accordingly. Prior to reaching a final decision on the dispute, FAA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from each Party and provide the Parties and the ACHP with a copy of this written response.

C. FAA may then proceed according to its decision. The Parties remain responsible for carrying out all the other actions subject to the terms of this PA that are not the subject of the dispute.

XII. AMENDMENTS

Any Party to this PA may propose that the PA be amended, whereupon the Parties will consult in accordance with 36 CFR Part 800.6(c)(7) to consider such an amendment. The amendment will be effective on the date the last Signatory signs the amendment. No amendment shall be effective unless it is in writing and signed by all Signatories to this PA.

XIII. TERMINATION

A. If any Party to this PA determines that its terms will not, or cannot be carried out, that Party shall immediately consult with the other Parties to attempt to develop an amendment per Stipulation XII. If within forty-five (45) calendar days (or another time period agreed to by all Parties) an amendment cannot be reached, any Party may terminate the PA upon written notification to the other Parties.

B. Once the PA is terminated and prior to work continuing on the proposed Undertaking, FAA must either (a) execute another PA or agreement with different terms pursuant to 36 CFR §800.6 or (b) take into account and respond to the comments of the ACHP under 36 CFR §800.7. FAA shall notify the Parties as to the course of action it will pursue. The FAA will undertake its obligations pursuant to applicable statutes, regulations, and Orders.

Execution of this PA by the FAA, the SHPO, the KCAD, the Kaw Nation, the Osage Nation, the Pawnee Nation, and the Ponca Tribe of Oklahoma and implementation of its terms evidences that the FAA has taken into account the effects of this proposed Undertaking on historic properties and afforded the ACHP an opportunity to comment.

PROGRAMMATIC AGREEMENT
AMONG
THE FEDERAL AVIATION ADMINISTRATION,
MISSOURI STATE HISTORIC PRESERVATION OFFICE,
THE CITY OF KANSAS CITY, MISSOURI,
KAW NATION, OSAGE NATION, PAWNEE NATION,
AND THE PONCA TRIBE OF OKLAHOMA
IMPLEMENTING
SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR
THE PROPOSED TERMINAL REPLACEMENT PROJECT AND THE
DEMOLITION OF TERMINALS A, B, AND C AT
KANSAS CITY INTERNATIONAL AIRPORT
KANSAS CITY, PLATTE COUNTY, MISSOURI

Signatory:

Federal Aviation Administration

By: Jim A. Johnson Date: 1/28/19

Jim Johnson, Director, Central Region, Airports Division ACE-600

PROGRAMMATIC AGREEMENT
AMONG
THE FEDERAL AVIATION ADMINISTRATION,
MISSOURI STATE HISTORIC PRESERVATION OFFICE,
THE CITY OF KANSAS CITY, MISSOURI,
KAW NATION, OSAGE NATION, PAWNEE NATION,
AND THE PONCA TRIBE OF OKLAHOMA
IMPLEMENTING
SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR
THE PROPOSED TERMINAL REPLACEMENT PROJECT AND THE
DEMOLITION OF TERMINALS A, B, AND C AT
KANSAS CITY INTERNATIONAL AIRPORT
KANSAS CITY, PLATTE COUNTY, MISSOURI

Signatory:

Missouri State Historic Preservation Office

By: Toni M. Prawl Date: 01/02/2019

Dr. Toni M. Prawl, Deputy State Historic Preservation Officer

PROGRAMMATIC AGREEMENT
AMONG
THE FEDERAL AVIATION ADMINISTRATION,
MISSOURI STATE HISTORIC PRESERVATION OFFICE,
THE CITY OF KANSAS CITY, MISSOURI,
KAW NATION, OSAGE NATION, PAWNEE NATION,
AND THE PONCA TRIBE OF OKLAHOMA
IMPLEMENTING
SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR
THE PROPOSED TERMINAL REPLACEMENT PROJECT AND THE
DEMOLITION OF TERMINALS A, B, AND C AT
KANSAS CITY INTERNATIONAL AIRPORT
KANSAS CITY, PLATTE COUNTY, MISSOURI

Signatory:

City of Kansas City, Missouri (by and through Kansas City Aviation Department)

By: Patrick Klein Date: 12-28-18

Pat Klein, Director, Aviation Department

Approved as to form:

By: Galen A. Beaufort Date: 12-28-18

Galen P. Beaufort, Senior Associate City Attorney

PROGRAMMATIC AGREEMENT
AMONG
THE FEDERAL AVIATION ADMINISTRATION,
MISSOURI STATE HISTORIC PRESERVATION OFFICE,
THE CITY OF KANSAS CITY, MISSOURI,
KAW NATION, OSAGE NATION, PAWNEE NATION,
AND THE PONCA TRIBE OF OKLAHOMA
IMPLEMENTING
SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT FOR
THE PROPOSED TERMINAL REPLACEMENT PROJECT AND THE
DEMOLITION OF TERMINALS A, B, AND C AT
KANSAS CITY INTERNATIONAL AIRPORT
KANSAS CITY, PLATTE COUNTY, MISSOURI

Invited Signatory:

Kaw Nation

By: Date:

Crystal Douglas, Tribal Historic Preservation Officer

PROGRAMMATIC AGREEMENT
AMONG
THE FEDERAL AVIATION ADMINISTRATION,
MISSOURI STATE HISTORIC PRESERVATION OFFICE,
THE CITY OF KANSAS CITY, MISSOURI,
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KANSAS CITY INTERNATIONAL AIRPORT
KANSAS CITY, PLATTE COUNTY, MISSOURI

Invited Signatory:

Osage Nation

By: _____ Date: 1/2/19

Geoffrey M. Standing Bear, Principal Chief

PROGRAMMATIC AGREEMENT
AMONG
THE FEDERAL AVIATION ADMINISTRATION,
MISSOURI STATE HISTORIC PRESERVATION OFFICE,
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KANSAS CITY INTERNATIONAL AIRPORT
KANSAS CITY, PLATTE COUNTY, MISSOURI

Invited Signatory:

Pawnee Nation

By: Matt Reed Date: 1-2-2019

Matt Reed, Tribal Historic Preservation Officer

PROGRAMMATIC AGREEMENT
AMONG
THE FEDERAL AVIATION ADMINISTRATION,
MISSOURI STATE HISTORIC PRESERVATION OFFICE,
THE CITY OF KANSAS CITY, MISSOURI,
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KANSAS CITY INTERNATIONAL AIRPORT
KANSAS CITY, PLATTE COUNTY, MISSOURI

Invited Signatory:

Ponca Tribe of Oklahoma

By: Halona Cabe Date: 2-4-19

Halona Cabe, Tribal Historic Preservation Officer

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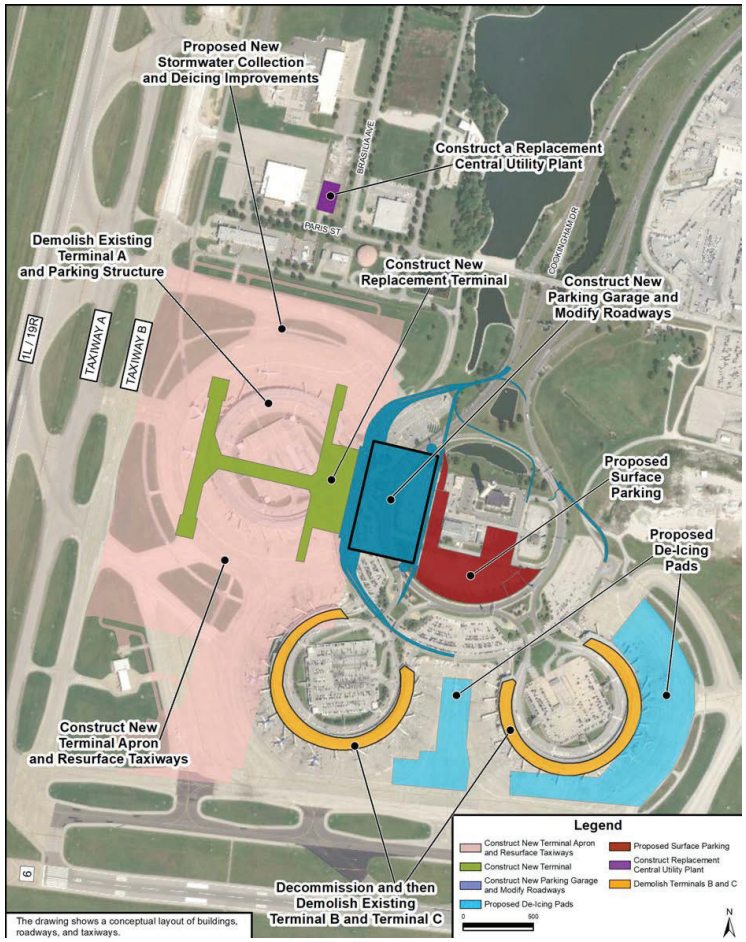
Attachment 1: Proposed Undertaking



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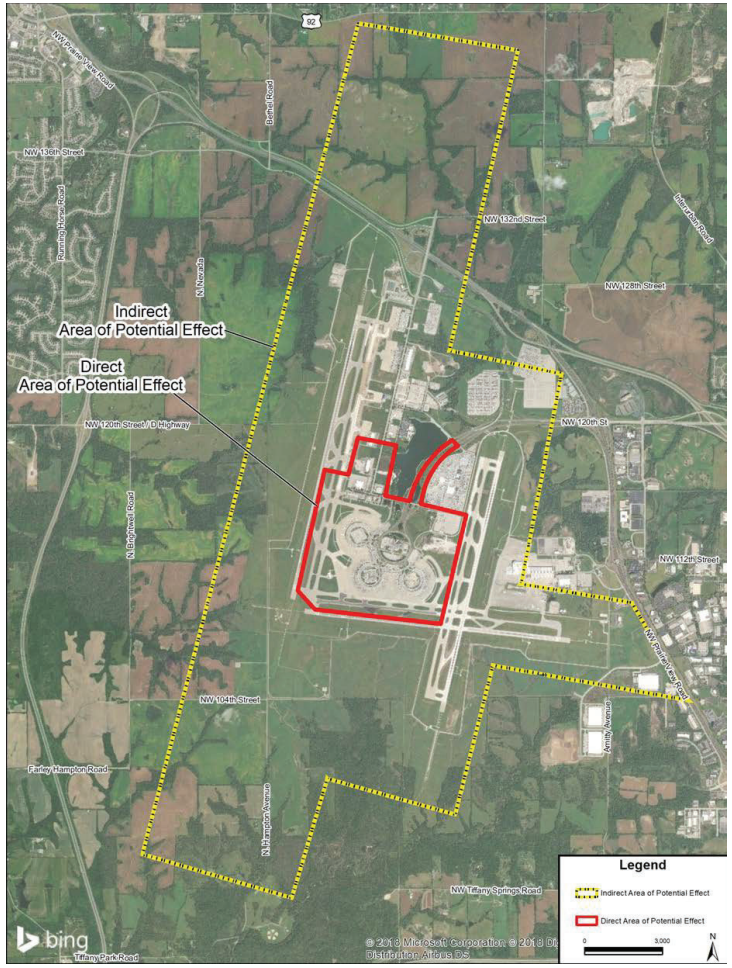
Attachment 2: Areas of Potential Effects



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Attachment 3: Points of Contact

Federal Aviation Administration

Primary contact:

Jim Johnson
Central Region Airport Division Director
Airports Division (ACE-600), Room 364
901 Locust St.
Kansas City, MO 64106-2325
816-329-2600
Jim.Johnson@faa.gov
Method of contact for project notification and documentation: email
Method of contact for other communication: email or phone

Secondary contact:

Scott Tener
Environmental Specialist
901 Locust St., Room 364
Kansas City, MO 64106-2325
816-329-2639
Scott.Tener@faa.gov
Method of contact for project notification and documentation: email
Method of contact for other communication: email or phone

Missouri State Historic Preservation Office

Primary contact:

Dr. Toni M. Prawl
Director
PO Box 176
Jefferson City, MO 65102
573-751-2123
Toni.Prawl@dnr.mo.gov
Method of contact for project notification and documentation: [postal mail and email]
Method of contact for other communication: [postal mail, email, phone call]

Secondary contact:

Amanda Burke, MFA
Historic Preservation Specialist
PO Box 176
Jefferson City, MO 65102
573-522-4641
Amanda.Burke@dnr.mo.gov
Method of contact for project notification and documentation: [postal mail or email]
Method of contact for other communication: [postal mail, email, phone call]

City of Kansas City, Missouri

Primary contact:

Pat Klein
Director of Aviation (Airport Director)
City of Kansas City, Aviation Department
601 Brasilia Avenue
Kansas City, MO 64153
816-243-3107
Pat.Klein@kcmo.org
Method of contact for project notification and documentation: [email, phone, postal mail]
Method of contact for other communication: [email, phone, postal mail]

Secondary contact:

Jade Liska
Deputy Director - Planning and Engineering Division
City of Kansas City, Aviation Department
601 Brasilia Avenue
Kansas City, MO 64153
816-243-3045
Jade.Liska@kcmo.org
Method of contact for project notification and documentation: [email, phone, postal mail]
Method of contact for other communication: [email, phone, postal mail]

Kaw Nation

Primary contact:

Crystal Douglas
Historic Preservation Office
P.O. Box 50
Kaw City, Oklahoma
1-866-404-5297 extension 235
Crystal_Douglas@kawnation.com
Method of contact for project notification and documentation: [postal mail or email]
Method of contact for other communication: [postal mail, email, phone call]

Secondary contact:

N/A

Osage Nation

Primary contact:

Dr. Andrea A. Hunter
Tribal Historic Preservation Officer/Director
Osage Nation
627 Grandview Avenue
Pawhuska, OK 74056
918-287-5671
ahunter@osagenation-nsn.gov
Method of contact for project notification and documentation: postal mail/courier
Method of contact for other communication: email, phone call

Secondary contact:

John Fox
Archaeologist
Osage Nation
627 Grandview Avenue
Pawhuska, OK 74056
918-287-5274
jfox@osagenation-nsn.gov
Method of contact for project notification and documentation: postal mail/courier
Method of contact for other communication: email, phone call

Pawnee Nation

Primary contact:

Matt Reed
Historic Preservation Officer Pawnee Nation
P.O. Box 470
Pawnee, Oklahoma 74058
918-762-2180
jreed@pawneenation.org
Method of contact for project notification and documentation: postal mail/courier
Method of contact for other communication: [postal mail, phone call]

Secondary contact:

N/A

Ponca Tribe of Oklahoma

Primary contact:

Halona Cabe
Tribal Historic Preservation Officer
121 White Eagle Drive
Ponca City, Oklahoma 74601
580-763-0120
Halona.Clawson@ponca.com
Method of contact for project notification and documentation: [postal mail or email]
Method of contact for other communication: [postal mail, email, phone call]

Secondary contact:

N/A

Attachment 4: Plan for Construction Monitoring

KCAD will have a professional archaeologist (project archaeologist) who meets the Secretary of Interior's *Professional Qualification Standards* present to conduct construction monitoring during certain ground disturbing activities associated with the proposed Undertaking.

Monitoring is defined as active observation of earth-moving or other work that could adversely affect unknown cultural resources within the direct APE. KCAD will ensure that all stages of any necessary field investigation, laboratory work, analysis, and report preparation comply with the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation* (48 FR 44716). In addition, both the Principal Investigator and any supervising archaeologists employed subsequent to any unanticipated discovery will meet the Secretary of Interior's *Professional Qualification Standards* and the professional qualification requirements for certification in the Register of Professional Archaeologists and follow the *Code of Conduct and Standards for Research and Performance*.

(1). KCAD will ensure that the selected contractor(s) will implement all provisions, stipulations, techniques, methods, analyses, interpretation, and documentation called for in this PA.

(2). Based on past work and investigations, not all areas of the direct APE are considered likely to yield unknown cultural resources. In order that the project archaeologist is aware of the areas with the most potential for unexpected archaeological discoveries, KCAD will provide the results of all previous archaeological investigations within the direct APE to the project archaeologist.

(3). KCAD will supply the project archaeologist with a construction schedule and design plans prior to the initiation of ground disturbing activities. It is estimated that the project archaeologist would be required to be on-site in three main phases of construction including; 1) demolition of Terminal A and initial stages of construction, such as site preparation and foundation work, for the replacement terminal; 2) demolition of Terminal B; and 3) demolition of Terminal C.

(4). Any grading and excavation activities within the direct APE that have not been identified as containing redeposited fill material from the construction of the original terminals or having been previously disturbed shall be monitored by a qualified archaeologist. The project archaeologist shall be empowered to halt construction activities in the immediate area if potentially significant resources are identified. Test excavations may be necessary to reveal whether such findings are significant or insignificant. In the event of notification by the project archaeologist that a potentially significant or unique archaeological/cultural find has been unearthed, Stipulations identified in V and/or VI will be implemented.

Initial determinations of those areas that require archaeological monitoring will be made based on construction plans prior to the start of grading and construction activities by the qualified archaeologist. The known depth of redeposited fill or disturbance versus the depth of the planned grading activities are crucial factors in the determination of the areas in which archaeological monitoring is required.
The identification of those areas that should be subjected to archaeological monitoring (e.g., those areas not identified as containing redeposited fill material or having been previously disturbed) will be made by the project archeologist, and will be made in consultation with the FAA, SHPO, and the Tribes.

The project archeologist will provide a Master Monitoring Plan including a map of anticipated areas requiring archaeological monitoring and the methodology both for determining those areas and how they will be monitored. KCAD will submit the plan prior to the start of each of the three main phases of construction for review by FAA, SHPO, and Tribes with a maximum of 30 days for review and comment. Because the Undertaking is a design-build project, if there are any changes from the original Master Monitoring Plan or any changes identified by the project archaeologist, KCAD would submit any new information to the FAA, SHPO, and Tribes for a 15-day review resulting from more specific construction plans.

If there is disagreement between the City, the FAA, the SHPO, and the Tribes on which anticipated areas require archaeological monitoring or how they will be monitored, there will be a meeting via telecom to discuss the issues to work out a solution. All comments by the FAA, the SHPO, and the Tribes will be taken into account. The final determination will be made by the project archeologist who will have the best understanding of the conditions on the ground.

The project archaeologist will be provided the limits of cut and fill from the original terminals construction records. Monitoring in areas with the potential for subsurface archaeological deposits will be monitored at a frequency to be determined by the project archaeologist. The project archaeologist would pay close attention to any changes in the soil morphology, color, and features that might be exposed during sediment scrapings done by bulldozers or other construction equipment.

There will be only one project archaeologist. However, depending on the construction schedule, the project archaeologist may use other monitors, including Tribal monitors if applicable in order to ensure the protection of unexpected archaeological discoveries. The project archaeologist will direct these monitors, including Tribal monitors if applicable in the field.

Procedures for archaeological monitoring in the direct APE for this Undertaking are as follows:

a. Excavation and any other ground-disturbing activity in areas designated as having a high potential for subsurface archaeological deposits will be monitored full time by the project archaeologist. Areas having a high potential for archaeological deposits will include areas determined to contain undisturbed, native soils. As the potential for unidentified resources changes, the project archaeologist has the authority to change the monitoring requirement to part-time observation or periodic spot checking. The project archaeologist will have the responsibility of stipulating the preservation or protection of newly discovered archaeological sites. Only after these areas have been viewed during grading, and these observations verify the reduced potential for cultural resources corresponding to the level of disturbances encountered, will the monitoring requirements be relaxed. The project archaeologist will have the final decision regarding the time, duration, and intensity of monitoring activities.

b. Construction excavation and any other ground-disturbing activity in areas designated as potentially containing redeposited fill or having been disturbed to an unknown depth will be monitored periodically or suspended entirely as determined by the project archaeologist.

c. The project archeologist will determine the number of monitors including Tribal monitors if applicable on any given day based on the level of effort proposed for excavation and other ground-disturbing activities. Any activity in areas designated as having a high potential for subsurface archaeological deposits are more likely to require additional archaeological monitors.

d. Monitor(s) will examine all exposed soil profiles for archaeological deposits as safety conditions permit. The archaeological monitor(s) shall also have access to all geological soils testing in order to track the documented locations and depths of fill soil.

e. If the project archaeologist, in consultation with the FAA, KCAD, SHPO, and Tribes, determines that excavations are needed in order to evaluate the significant of the identified cultural deposit, the site will be fenced or flagged off and construction activity diverted away from the area as described in the applicable stipulation. The fencing or flagging will serve to mark site boundaries and to keep construction equipment away from the potential archaeological deposit until further investigation is conducted.

f. All monitoring activity will be recorded on a daily basis. These daily reports will provide the basis for the monitoring closure report. The project archaeologist and monitor(s), including Tribal monitor(s) if applicable will take photographs to aid in the documentation efforts. The project archaeologist will submit daily and weekly electronic reports summarizing the day's and week's monitoring activity to the FAA, KCAD, SHPO, and Tribes. The FAA, KCAD, SHPO, and Tribes will have forty-eight (48) hours to comment on all daily reports and seven (7) calendar days to comment on all weekly reports. The weekly report will consist of the combined daily reports so they can be reviewed efficiently. If there are any significant findings that require immediate attention an email marked urgent will be sent to the FAA, SHPO, and Tribes.

g. The project archaeologist and monitor(s) and Tribal monitor(s) if applicable shall follow the safety and access protocol defined by KCAD and construction contractor. All archeological monitors working at the site shall be properly attired with construction vests, hard hats, construction boots, and long pants at all times within the construction zones.

(5). If during construction there are any Unanticipated Discoveries of Cultural Resources Sites and Artifacts or Inadvertent Discoveries of Human Remains, Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony, Stipulations V and/or VI of this PA will be implemented.

(6). Thirty (30) calendar days after the conclusion of the construction monitoring for each of the three main phases of construction including; 1) demolition of Terminal A and initial stages of construction for the replacement terminal; 2) demolition of Terminal B; and 3) demolition of Terminal C; the project archaeologist will complete a descriptive monitoring closure report and provide the report to the FAA, KCAD, SHPO, and Tribes. The monitoring closure report shall contain at a minimum: field notes, formal written descriptions of the monitoring activities, and a summary of the findings. The monitoring closure report will be submitted electronically and hardcopy via regular mail to the FAA, KCAD, SHPO, and Tribes. The FAA, KCAD, SHPO, and Tribes will have forty-five (45) calendar days to review and comment on each monitoring closure report.

Attachment 5:
Plan for Unanticipated Discoveries of Cultural Resources Sites and Artifacts

KCAD will ensure that the following procedures are used in the event that previously unreported and unanticipated cultural resource sites or artifacts are encountered during the construction of the proposed Undertaking. The procedures are intended to ensure that the proposed Undertaking is in compliance with all applicable federal and state laws and regulations, including Section 106 of the NHPA. KCAD will include in all contractor agreements and other documentation step-by-step procedures for the contractor or other individuals to follow regarding their role when inadvertent discoveries occur.

(1). In the event that previously unidentified resources are discovered during ground disturbing activities, all work within a designated buffer zone shall stop immediately. The buffer zone will be one hundred (100) meter radius around the discovery and in the surrounding area where further subsurface archaeological resources can reasonably be expected to occur. The project archaeologist, as defined above in **Attachment 4,** Plan for Construction Monitoring, will ensure that the boundaries of any identified sites are appropriately established and recorded. Construction may continue outside this buffer zone. KCAD by and through its contractor will implement interim measures to protect the discovery from looting and vandalism, including, but not limited to, flagging or fencing the area, and providing additional security.

(2). If KCAD representatives are not present, the contractor will immediately contact KCAD, see **Attachment 3,** Points of Contact, which will immediately notify the FAA, the SHPO, and law enforcement (Missouri Revised Statute §194.406).

(3). Within twenty-four (24) hours of receipt of notification of the discovery, an archaeologist meeting the Secretary of the Interior's Standards and Guidelines (SOI) shall:

a. Inspect the work site to determine the extent of the discovery and ensure that work activities have halted within the buffer zone; and
b. Clearly mark the area of the discovery by means of flagging or fencing to protect the area from looting and vandalism; and
c. Provide an initial assessment of the site's condition and eligibility to KCAD and the FAA. The FAA will then immediately notify the SHPO and the Tribes by phone and email.

(4). Within fourteen (14) calendar days of the original notification of discovery, the FAA, in consultation with the SHPO and the Tribes, will determine the NRHP eligibility of the resource. The FAA, SHPO, or the Tribes may extend this fourteen (14)-day calendar period one time by an additional seven (7) calendar days, with the party requesting extension providing written notice to the other parties prior to the expiration date of the said fourteen (14)-day calendar period.

(5). If the resource site or artifact is or may be eligible for the NRHP, the FAA, in consultation with the SHPO and Tribes, shall submit to the SHPO and/or Tribes depending on applicability a plan for its avoidance, protection, or recovery of information through the established Section 106 process. Said plan will be submitted to the SHPO and Tribes for comment within fourteen (14) calendar days of a determination of eligibility. The SHPO/Tribes shall approve the final plan prior to implementation.

(6). Following consultation and concurrence with the SHPO and the Tribes, work in the affected area may resume pending either:

a. Development and implementation of an appropriate data recovery plan or other recommended mitigation procedures. Statements regarding the potential significance of any site remnants not removed during data recovery will be included; or
b. Determination that the located site or artifact is not eligible for inclusion in the NRHP.

(7). Upon request, the Tribes and the SHPO shall be able to visit the site with the FAA and KCAD.

(8). All artifacts will be collected and temporarily curated by the project archaeologist until returned to the landowner, KCAD, in accordance with state law. The artifacts will be permanently curated at an institution determined in consultation among the FAA, the SHPO, KCAD, and the Tribes. All artifacts must be curated and preserved according to the National Park Service's Standards for Historic Vessel Preservation Projects.

(9). The FAA will seek and take into account the recommendations of the Keeper of the NRHP in resolving any disagreements regarding eligibility of a site or artifact to the NRHP or ACHP in resolving any disagreements that may arise regarding resolution of adverse effects.

(10). If required under 36 CFR Part 800, the FAA will conduct additional consultation not specifically addressed herein.

(11). The project archaeologist will provide daily and weekly progress reports in electronic format documenting any recovery efforts to the FAA, SHPO, KCAD, and the Tribes. The FAA, SHPO, KCAD, and the Tribes will have forty-eight (48) hours to review and comment on the daily reports and seven (7) calendar days to review and comment on all weekly reports. Within thirty (30) calendar days after recovery is complete, the project archaeologist will provide a closure report electronically and hardcopy via regular mail to the FAA, SHPO, and the Tribes. The FAA, SHPO, and the Tribes will have forty-five (45) calendar days to review and comment on the closure report. Statements regarding the potential significance of any site remnants not removed during data recovery will be included in the closure report. Data that would divulge the specific location of the site or any remaining features will not be included in any report made available to the public and will be made available only to the FAA, the SHPO, and the Tribes.

Attachment 6:
Plan for Inadvertent Discoveries of Human Remains, Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony

The respectful treatment of human remains and burial furniture is a paramount concern to the FAA, the SHPO, the KCAD, the Tribes, and the local community. The following will be a condition to the proposed Undertaking. KCAD will include in all contractor agreements and other documentation step-by-step procedures for the contractor or other individual to follow regarding their role when inadvertent discoveries occur. Should KCAD personnel, contractors, or other individuals fail to report a post-review discovery of human remains, they may be subject to penalties under the Missouri unmarked human burial law Missouri Revised Statute §§194.400–410 and under the Missouri public and private cemeteries human burial law Missouri Revised Statute §214. These, and other laws, protect and provide consultation procedures for addressing impacts to, and discoveries of, human remains and graves on private lands within the State of Missouri. The purpose of these procedures is to ensure the respectful treatment of human remains and burial furniture and to ensure that the Tribes' and the local community's concerns are fully considered. In the event of an inadvertent discovery of human remains, even if such remains are in fragmentary form, KCAD will ensure the following occurs.

(1). Any City employee, contractor, subcontractor, or other individual who knows or has reason to know that he or she has inadvertently discovered human remains, funerary objects, sacred objects, or objects of cultural patrimony during construction or maintenance activities must provide immediate telephone notification of the inadvertent discovery to KCAD, Airport Director, see **Attachment 3,** Points of Contact.

(2). KCAD will ensure that all work is immediately stopped within a one hundred (100) meter radius buffer zone around the point of discovery. KCAD will assume responsibility for implementing additional measures, as appropriate, to protect the discovery from looting and vandalism until the requirements of the Missouri unmarked human burial law (Missouri Revised Statute §§194.400–410) have been completed, but must not remove or otherwise disturb any human remains or other items in the immediate vicinity of the discovery.

(3). KCAD, Airport Director, will immediately notify local law enforcement in accordance with Missouri Revised Statute §194.406 by telephone of the discovery of unmarked human remains and accompany local law enforcement personnel during all field investigations. Local law enforcement will investigate the human remains and contact the Medical Examiner Office.

(4). KCAD will notify the FAA, and the FAA will notify the SHPO and the Tribes by telephone and email within twenty-four (24) hours of the discovery of human remains, funerary objects, sacred objects, items of cultural patrimony, or burial furniture and inform them of the steps already taken to address the discovery.

(5). KCAD will take immediate steps, if necessary, to further secure and protect inadvertently discovered human remains, funerary objects, sacred objects, or items of cultural patrimony, including, as appropriate, stabilization, or covering using natural materials, i.e., canvas tarps of the find location.

(6). Other than for crime scene investigation, no excavation, examination, photographs, or analysis of human remains will be conducted by the FAA, KCAD, or any other professional without first consulting with the Tribes. In the instance of human remains suspected of being Native American, the Tribes or, if affiliation is established, the specific Tribe must provide permission for excavation, examination, photographs, or analysis of human remains. Upon discovery of human remains suspected of being Native American, KCAD and FAA will consult with the Tribes or specific Tribe to create mitigation measures or alterations to the Undertaking to address if the Tribes would like the remains to stay in place. If the remains are unable to stay in place consultation under Native American Graves Protection and Repatriation Act (NAGPRA) would be initiated. It may be possible for immediate reinternment of remains on other airport property that would not interfere with long-term airport development plans.

(7). If upon investigation, the local law enforcement officer determines that the remains are not involved in a legal investigation, the protocol implementing the Missouri unmarked human burial law (Missouri Revised Statute §§194.400–410) will apply.

(8). The KCAD in consultation with the FAA, SHPO, and Tribes, will have seven (7) calendar days to determine the degree to which the human remains were disturbed; and, if possible without any further disturbance, using reasonable measures to assess their potential age, cultural affiliation, and identity. The KCAD will notify the FAA, SHPO, and the Tribes of its findings. This notification must include pertinent information as to kinds of human remains, funerary objects, sacred objects, or items of cultural patrimony discovered, their condition, and the circumstances of their inadvertent discovery. The FAA will also inform the Tribes of any involvement the SHPO plans to have in the process.

(9). The Tribes will have seventy-two (72) hours to respond verbally followed by written response via U.S. mail and electronic mail. The response will specify each Tribe's intent to conduct or decline further consultation.

(10). The FAA will consult with the Tribes and the SHPO, or other interested parties such as living descendants whether they are Parties to this PA or not, regarding additional measures to avoid and protect or mitigate the adverse effect of the proposed Undertaking on the human remains and grave site. These measures may include:

a. Formally evaluate the archaeological site for NRHP-eligibility;
b. Visits to the site by the SHPO, Tribes, and other consulting parties;
c. Explore potential alternatives to avoid the human remains or grave;
d. Develop a mitigation plan by the KCAD in consultation and concurrence with the appropriate SHPO, Tribes, or identified lineal descendant, including procedures for disinterment and re-interment; and
e. Implementation of the mitigation plan.

(11). The FAA and KCAD, in consultation with the SHPO, the Tribes and other interested parties (such as living descendants whether they are Parties to this PA or not), may consult with a qualified physical anthropologist, forensic scientist, or other experts as may be needed to examine and assess the inadvertent discovery. The evaluation will be conducted at the site of discovery. The consulting expert will be allowed to draw and measure the exposed remains and associated funerary objects. No photographs or digital images will be permitted. Drawings and other records will be curated by the SHPO. Drawings cannot be published in any form or shown as part of scholarly presentations without the written permission of the Tribes or nearest living descendant, as applicable. If, after a determination by a qualified physical anthropologist, forensic scientist, or other experts in consultation with SHPO, Tribes, and other consulting parties, the human remains are not Native American then FAA, in consultation with the SHPO will determine how to treat the remains per Missouri Revised Statute §§194.400–410.

(12). KCAD recognizes that it is preferable to leave a burial in place along with all associated artifacts; however, if the burial is to be removed, KCAD commits to reburying the human remains in accordance with state law, along with all associated prehistoric and/or historic artifacts. If the burial is to be removed, the human remains and all associated objects will be mapped prior to their removal and then removed. The decision to disinter the remains as well as subsequent plans for reburial will be made in consultation and concurrence with the Tribes and other consulting parties. In the instance of human remains suspected of being Native American, the Tribes or, if affiliation is established, the specific Tribe must provide permission to disinter the remains as well as approve any subsequent plans for reburial. If the remains are determined to be Native American, KCAD and FAA will consult with the Tribes or specific Tribe to create mitigation measures or alterations to the Undertaking to address if the Tribes would like the remains to stay in place. If the remains are unable to stay in place consultation under Native American Graves Protection and Repatriation Act (NAGPRA) would be initiated. It may be possible for immediate reinternment of remains on other airport property that would not interfere with long-term airport development plans. Additionally, if the remains are determined to be non-Native American remains they would be subject to state law which requires the Missouri Advisory Council of Historic Preservation to be involved in the reinternment decision. KCAD would be willing to handle reburial if necessary.

(13). KCAD will provide daily human remains recovery reports in the event human remains are discovered in electronic format to the FAA, the SHPO, and the Tribes. The FAA, SHPO, KCAD, and the Tribes will have forty-eight (48) hours to review and comment on the daily reports.

(14). KCAD will prepare a report of findings describing the Inadvertent Discoveries of Human Remains, Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony within thirty (30) calendar days of the resolution of each inadvertent discovery. This report must meet the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation* (49 FR 44716). Copies of the report will be provided electronically and hardcopy via regular mail to the SHPO, the FAA, the Tribes, and, if appropriate, other interested parties (such as living descendants whether they are Parties to this PA or not).

Attachment 7: Plan for Photographic Record of Terminal A

(1). KCAD will contract with a historian or architectural historian who meets Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61) to create a photographic record of Terminal A with a high-resolution digital camera in accordance with the National Register Photo Policy Standards. The views of the photographs include general environment, front facade, front and rear perspective views, typical windows, and exterior and interior views. The photographs will be submitted to the SHPO for review. The SHPO will consult on the selection of approximately eighty (80) images to be printed for archival purposes and provide final approval within thirty (30) calendar days of submittal of the printed photographs. These photographs may be submitted before products in Stipulation VIII. Demolition of Terminal A may be begin upon written acceptance of the printed and digital photographs, photo key, photo log, photo map by SHPO, and execution of this PA.

(2). Upon final approval of the images to be archived by the SHPO, KCAD will print one set of images as 8 inches by 10 inches black and white photographs on Epson Ultra-Premium Luster Photo Paper. The final photo submissions will include the photographs labeled on the back with soft lead pencil or archival pen. The final printed photographs will be submitted to the SHPO.

(3). KCAD will provide an archival CD with the original color.JPG images, photo key, photo log, and map documenting the location and direction of each photo all of which meet the National Register Photo Policy Standards to the FAA and the SHPO.

(4). Upon written acceptance of the printed and digital images by the SHPO and execution of this PA, KCAD may begin demolition of Terminal A.

(5). The KCAD and the SHPO will be the repository for this information. KCAD will notify the Missouri State Archives or other interested institutions or repositories to determine if they would like a copy of the documentation, KCAD will provide access to any interested institutions with a free, digital copy of the images. Physical copies may be provided at the requester's expense for printing and shipping.

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Attachment 8: Plan for Additional Mitigation Measures

There is already a good amount of information known and recorded about the existing historic property. Therefore, the following provides for development of additional mitigation measures to resolve the adverse effects of the proposed Undertaking. Once selected, the mitigation measures must be complete before the City may implement the demolition of Terminal B and Terminal C (anticipated by 2022).

(1). Commission Creation. The City and KCAD understands it is important to involve the public in the development of meaningful mitigation projects and to afford community leaders and stakeholders the opportunity to collaborate with the City and help select the mitigation projects that are the most meaningful to the Kansas City community. The following provides the procedures for selection of the mitigation participants (Commission) and the process to determine the appropriate mitigation for the proposed Undertaking.

a. At the request of the SHPO, KCAD initially contacted the following organizations to determine their interest in participating in this mitigation process:

- TWA Museum (Pamela R. Blaschum, Director)
- Platte County Historical Society (Lisa Wittmeyer, Curator)
- Historic Kansas City (Lisa Briscoe, Executive Director) (KCModern is an affiliate group of Historic Kansas City)
- AIA KC (Dawn Taylor, Executive Director)
- City of Kansas City, Missouri (Bradley Wolf, City Historic Preservation Officer)

The total Commission participants shall be no more than nine (9) members. The five (5) organizations contacted have initially agreed to participate. The SHPO, the FAA, and KCAD may recommend other Commission participants; however, the KCAD, Airport Director, has discretion to make up to four (4) final selections to the Commission.

b. KCAD shall be responsible for hosting and providing meeting space for a series of meetings by the Commission to consider suitable mitigation projects for the adverse effect to the historic property. The total number of meetings for this Commission should not exceed six (6) meetings lasting in duration of between one (1) hour to one and half hours. If the Commission feels at the end of these six (6) meetings additional time is needed, KCAD will accommodate additional meetings at the Commission's request. KCAD will inform the FAA and the SHPO of any additional meetings.

c. After final determination of all the members of the Commission, KCAD will poll the members to determine the day and time that works for all members for the meetings. KCAD will make every effort to establish a time when all members of the Commission can be present for the kickoff meeting. It is anticipated that the kickoff meeting will be held within thirty (30) calendar days of the Effective Date of this PA. If that is not possible, the first meeting will occur at the soonest agreed upon date and time by all members. The KCAD shall be responsible for recording the meeting minutes of each of the meetings. These meeting minutes will be provided electronically to the Commission participants and the SHPO within one (1) week of each meeting.

During the first meeting, KCAD will provide a history of the historic property and a description of the proposed Undertaking. KCAD will provide the preliminary list of potential mitigation ideas for consideration. KCAD will also be tasked to provide the Commission with any supplemental reports or documentation that they have available concerning the historic property. The KCAD, Airport Director, will be responsible for determining a reasonable budget for potential mitigation measures to help the Commission in their discussion. The initial meeting will also include a discussion of a general timeline for the development of the mitigation projects along with any funding limitations, particularly if federal funding or airport revenues are involved.

The goal of this Commission is to come up with specific creative mitigation options that can be implemented and to rank these potential mitigation projects in order of the Commission's preference. The role of KCAD is to support the Commission in creating mitigation options. As such, KCAD will be available during Commission meetings to answer questions. Commission members will create a process for coming up with specific creative mitigation options. The Commission will be charged with recording a summary of their recommendations and providing to KCAD. The Commission's recommendations should take funding limitations into consideration; however, it should not be the sole factor considered. If a recommendation goes over the reasonable budget determined by the KCAD, Airport Director, it may still be presented by the Commission to KCAD for review.

d. After the Commission has reached its recommendations, these recommendations will be provided by KCAD to the FAA and the SHPO either electronically or physically. The City, FAA, and the SHPO shall be provided the opportunity to review and comment on the recommendations provided by the Commission. The City, the FAA, and the SHPO shall have thirty (30) calendar days to review. After the thirty (30) calendar days, the KCAD, the FAA, and the SHPO will participate in a meeting either in person or via telecom to discuss the potential mitigation. All comments by the City, the FAA, and the SHPO will be taken into account prior to approval of final mitigation options. The KCAD, the FAA, and the SHPO will approve the potential mitigation projects after consideration of the Commission's preference and any budgetary limitations to resolve the adverse effects of this proposed Undertaking. If there is disagreement between the City, the FAA, and the SHPO on how the mitigation measures are to be implemented there will be a reconvening of the Commission to determine their intent.

e. The Commission will be consulted throughout the implementation process to ensure the selected mitigation is appropriate and successful. After implementation of the selected mitigation, KCAD will provide the SHPO and the FAA documentation of the completed mitigation efforts. The SHPO will provide acknowledgement of receipt of the documentation when all terms have been met. After the SHPO provides acknowledgement that all the terms have been met, the City may proceed with the demolition of Terminal B and Terminal C.

(2). Preliminary Mitigation Ideas. A preliminary list of potential mitigation ideas for consideration was developed by the KCAD. These mitigation ideas are not intended to be all inclusive but a starting point for deliberation. It is intended that these ideas combined with other ideas should be considered by the Commission when developing the final list of mitigation measures that will resolve the adverse effects of the proposed Undertaking.

a. Select 10-20 images from the photographic record and from historical prints of Terminals A, B, and C to create large format displays. The large format prints would be displayed in the new replacement terminal with an interpretation of these prints to provide insight into the history and architectural style of the existing Terminals A, B, and C.

b. Prepare a scale model, 3-D representation using a laser scan (LIDAR), or interactive display of the historic district that would be displayed in the new replacement terminal. The model or display would include a narrative or other signage about the architect, "Drive-to-the-Gate Concept", interpret the history of the terminals and the historic district, and information about the Brutalist style of architecture used in the original design.

c. Collect oral histories about the construction and early days of the terminals from construction workers, city leaders, airline employees, and others who were involved with the existing terminals. These oral histories could be created in conjunction with the national StoryCorps project or a similar organization. All participants shall receive a copy of their recordings. In addition, written memoirs, letters, and notes may be included and could be compiled for possible publication or available on the Airport's website. There is an existing video available on Youtube that documents the construction of the existing terminals. This video was not created as part of this mitigation effort. The Commission may recommend the creation of a new video or altering the existing video.

d. Prepare a video about the design and construction of the existing terminals, "Drive-to-the-Gate Concept", and the life of the architect Clarence Kivett. The video should be appropriate for use on public television. The video would also be made to run on a screen in the new terminal and available on the Airport's website along with posting to YouTube.

e. Provide a permanent interpretive electronic display potentially in the form of a kiosk in the new replacement terminal on the history of the airline industry in Kansas City.

f. Create an interactive website presenting the selected ideas including selected images from the photographic record of the historic terminal, oral histories about the construction and early days of the terminals, video about the construction of the existing terminals, history of the airline industry in Kansas City and the architect Clarence Kivett, 3-D representation or virtual walkthrough model of the existing terminals to be available on the Airport's website.

Tener, Scott (FAA)

From: Tener, Scott (FAA)
Sent: Friday, February 08, 2019 11:24 AM
To: Tener, Scott (FAA)
Subject: No Response: Request to be a Concurring Party to the KCI Programmatic Agreement
Attachments: PA for KCI Terminal Project_122718_Final.pdf

To File,

As of to date, the Watkins Foundation has not responded to the 2nd request to sign the KCI Programmatic Agreement as a concurring party pursuant to 36 CFR 800.6 (c) (3).

1st Request - December 12, 2018 provided Draft Programmatic Agreement to Mr. Raab and Watkins Foundation and sent email requesting whether the Watkins Foundation wanted to sign the agreement as a concurring party

2nd Request - January 2, 2019 provided final Programmatic Agreement to Mr. Raab and the Watkins Foundation and requested again if they would like to sign the agreement as a concurring party

Scott Tener
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
http://www.faa.gov/airports/central/

From: Tener, Scott (FAA)
Sent: Wednesday, January 02, 2019 9:55 AM
To: 'Raab, L Mark' <raabl@umkc.edu>; Andrus, Katherine (FAA) <Katherine.Andrus@faa.gov>
Cc: warren watkins <warrenwatkins@yahoo.com>; Bruce Watkins <brucewatkins007@gmail.com>; Ike Francis <ifrancis42@sbcglobal.net>; annmraab@gmail.com
Subject: RE: Public meeting dates for KCI Programmatic Agreement

Mr. Raab,

Please find attached the final Programmatic Agreement taking your comments under consideration. Please let us know if the Watkins Foundation would like to sign this agreement as a concurring party pursuant to 36 CFR 800.6 (c) (3).

Scott Tener
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
http://www.faa.gov/airports/central/

From: Raab, L Mark <raabl@umkc.edu>
Sent: Thursday, December 27, 2018 6:58 AM
To: Tener, Scott (FAA) <scott.tener@faa.gov>; Andrus, Katherine (FAA) <Katherine.Andrus@faa.gov>
Cc: warren watkins <warrenwatkins@yahoo.com>; Bruce Watkins <brucewatkins007@gmail.com>; Ike Francis <ifrancis42@sbcglobal.net>; annmraab@gmail.com
Subject: Public meeting dates for KCI Programmatic Agreement

Dear Mr. Tener,

What are the dates and places of public meetings for comments on the Programmatic Agreement for the KCI terminal modernization project?

Thanks for your assistance,
Mark Raab
For the Watkins Foundation,
Kansas City, Missouri

Tener, Scott (FAA)

From: Tener, Scott (FAA)
Sent: Thursday, February 14, 2019 11:29 AM
To: 'e106'
Cc: 'sstokely@achp.gov'; Andrus, Katherine (FAA); 'Prawl, Toni'
Subject: RE: ACHP e106: Executed PA for Proposed Terminal Replacement Project; Kansas City International Airport, Platte County, Missouri
Attachments: Appendix H from_KCI Terminal Draft Final EA_February 2019.pdf

Ref: *Proposed Terminal Replacement Project*
Kansas City International Airport
Platte County, Missouri

In ACHP's January 20, 1018 letter, ACHP indicated that it wanted to see an executed copy of a memorandum of agreement as well as the supporting documentation required under 36 CFR 800.6(b)(1)(iv). As we have previously indicated to you, adverse effects of the project are now being resolved through a programmatic agreement. We provided the executed programmatic agreement to you on February 8, 2019. In addition, ACHP requested that we submit supporting documents consistent with the requirements of Section 106. The programmatic agreement documents the steps that will be taken to avoid or minimize the undertaking's adverse effects. As part of the agreement, there will be the development of additional mitigation measures to fully resolve the adverse effects of the proposed Undertaking. During the comment period on the Draft EA and Section 106 evaluation, FAA did receive comments related to cultural and historic resources. FAA has addressed those comments in Appendix H of the Final Environmental Assessment, Section 106 Evaluation, and Section 4(f) Statement. Attached is a draft of that Appendix. If that draft is subsequently updated, FAA will provide that updated version to ACHP.

Please let me know if you have any questions,

Scott Tener
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
http://www.faa.gov/airports/central/

From: Tener, Scott (FAA)
Sent: Friday, February 08, 2019 2:06 PM
To: 'e106' <e106@achp.gov>
Cc: 'sstokely@achp.gov' <sstokely@achp.gov>; Andrus, Katherine (FAA) <Katherine.Andrus@faa.gov>; 'Prawl, Toni' <Toni.Prawl@dnr.mo.gov>
Subject: ACHP e106: Executed PA for Proposed Terminal Replacement Project; Kansas City International Airport, Platte County, Missouri

Ref: *Programmatic Agreement*
Proposed Terminal Replacement Project
Kansas City International Airport
Platte County, Missouri

Please find attached for your records the signed Programmatic Agreement for the subject undertaking.

Please let me know if you have any questions,

Scott Tener, P.E.
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
http://www.faa.gov/airports/central/

From: e106 <e106@achp.gov>
Sent: Tuesday, January 16, 2018 12:16 PM
To: Tener, Scott (FAA) <scott.tener@faa.gov>
Subject: RE: ACHP e106: Proposed Terminal Replacement Project; Kansas City International Airport, Platte County, Missouri

The ACHP has received your submission to e106@achp.gov. If your submission is to:

- notify the ACHP of a finding that an undertaking may adversely affect historic properties, and/or
- invite the ACHP to participate in a section 106 consultation, and/or
- propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings,

and you are enclosing the completed *e*106 form, this is your official dated receipt of your submission (in accordance with 36 CFR Part 800.6(1)). The ACHP has 15 working days to determine if it will participate in consultation to resolve adverse effects to historic properties. If the ACHP does not participate in consultation, the agency will still need to file the final agreement document and related documentation with the ACHP at the conclusion of the consultation process. This filing is required in order for the agency to complete its compliance responsibilities under Section 106 of the National Historic Preservation Act.

From: scott.tener@faa.gov [mailto:scott.tener@faa.gov]
Sent: Friday, January 12, 2018 3:02 PM
To: e106
Subject: ACHP e106: Proposed Terminal Replacement Project; Kansas City International Airport, Platte County, Missouri

Please see attached:

- e106 Form
- SHPO and Tribe restart coordination letters and attachments-2017
- Response Letters from SHPO- 2008, 2013, 2017
- FAA Determination of adverse effect to terminals-2013
- KCI Terminals Determination of Eligibility from SHPO-2013
- Misc-KCI Replacement Terminal EA_SHPO Coordination-2017

Please let me know if you have any questions,

Scott Tener, P.E.

Environmental Specialist
FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
http://www.faa.gov/airports/central/

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Kansas City International Airport
Environmental Assessment, Section 106 Evaluation, and
Section 4(f) Statement

Appendix D

D

Appendix D Land Use Assurance

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CITY OF FOUNTAINS
HEART OF THE NATION

KANSAS CITY
MISSOURI

Aviation Department

Kansas City International Airport
601 Brasilia Avenue
Kansas City, Missouri 64153-2054

P.O. Box 20047
Kansas City, Missouri 64195-0047

	(816)	FAX
Director	243-3100	243-3170
Deputy Director	243-3180	243-3113
Accounting	243-3120	243-3172
Economic Development	243-3020	243-3070
Engineering	243-3030	243-3071
Human Resources	243-3010	243-3072
Information Services	243-3140	243-3172
Marketing	243-3160	243-3171

February 20, 2018

Scott Tener
Federal Aviation Administration
Central Region - Airports Division
1901 Locust Street, Kansas City, MO 64106

RE: Proposed Replacement Terminal Project
Land Use Assurance
Kansas City International Airport

Dear Mr. Tener:

In accordance with 49 US Code 47107(a)(10), the City of Kansas City, Aviation Department (KCAD), as the sponsor for the Kansas City International Airport, is hereby providing written assurance that appropriate action, including the adoption of zoning laws, has been or will be taken, to the extent reasonable to restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and purposes compatible with normal airport operations, including landing and takeoff of aircraft. This assurance applies to both existing and planned land uses.

This assurance also applies to all land use activities associated with the Proposed Replacement Project, which is currently the subject of an Environmental Assessment. Although KCAD does not have zoning authority, KCAD will work closely with other jurisdictions to ensure appropriate land use regulations are adopted and enforced.

Please contact me if you have questions or need additional information.

Sincerely,

Pat Klein
Director of Aviation

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Kansas City International Airport
Environmental Assessment, Section 106 Evaluation, and
Section 4(f) Statement

Appendix E



Appendix E Visual Character Analysis

A reconnaissance of the airport perimeter was performed to identify potential areas that may be affected by the Proposed Action. Photographs were taken at various locations as shown on **Exhibit E-1**. **Exhibit E-2** provides the photograph that formed the baseline condition and was the basis for determining the existing visual character of the area.

Exhibit E-1 Photograph Analysis Locations

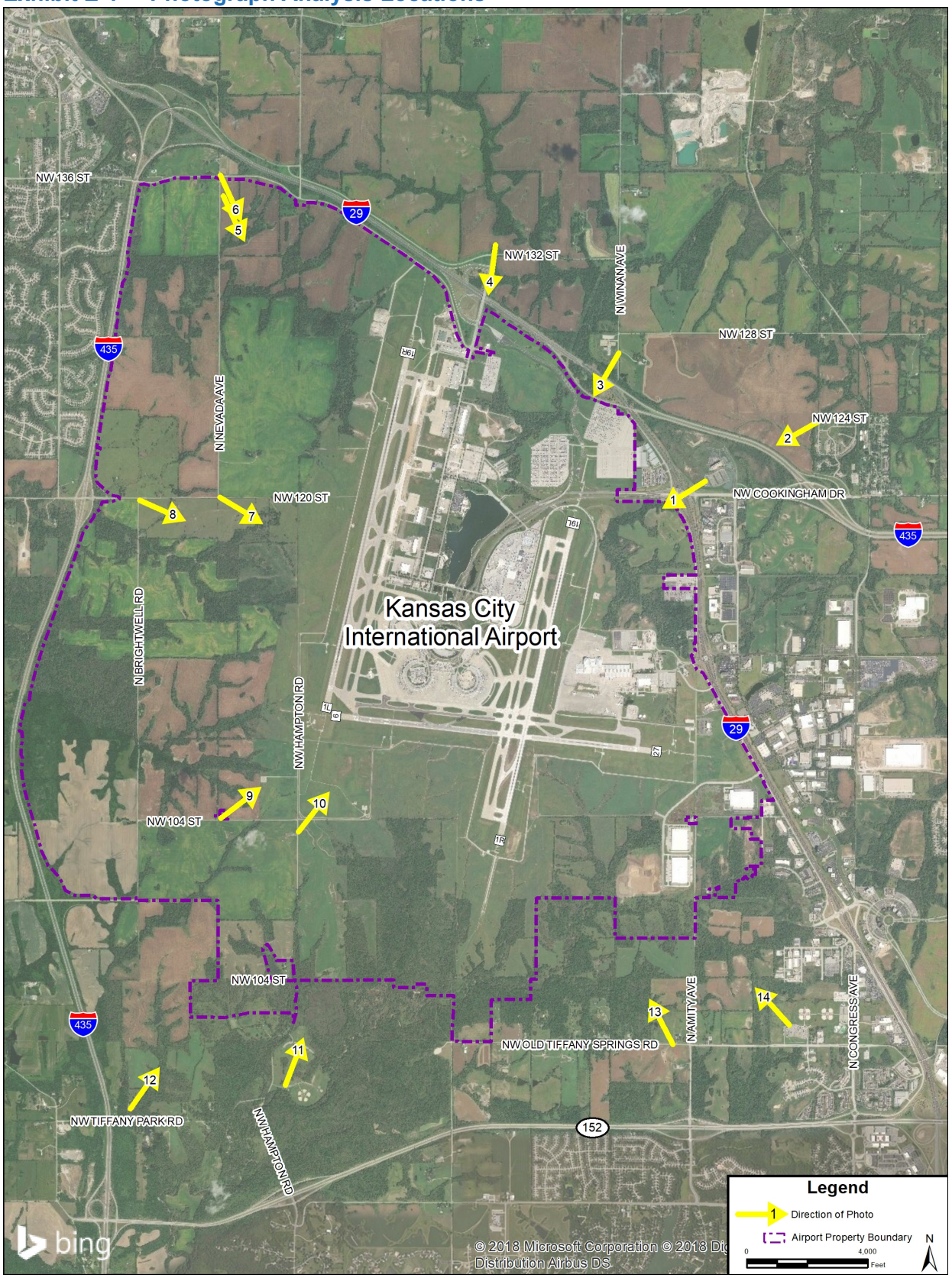


Exhibit E-2 Existing Visual Character









Exhibit E-2 Existing Visual Character (Continued)









Exhibit E-2 Existing Visual Character (Continued)



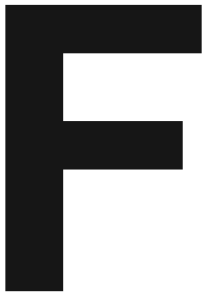
Exhibit E-2 Existing Visual Character (Continued)





Kansas City International Airport
Environmental Assessment, Section 106 Evaluation, and
Section 4(f) Statement

Appendix F



Appendix F Supplemental Information

This appendix contains the following:

- FAA's 2017 Terminal Area Forecast for Kansas City International Airport
- Future Airport Layout Plan

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APO TERMINAL AREA FORECAST DETAIL REPORT
Forecast Issued January 2018

	AIRCRAFT OPERATIONS														
	Enplanements			Itinerant Operations					Local Operations						
Fiscal Year	**Air Carrier**	**Commuter**	**Total**	**Air Carrier**	**Air Taxi & Commuter**	**GA**	**Military**	**Total**	**Civil**	**Military**	**Total**	**Total Ops**	**Total Tracon Ops**	**Based Aircraft**
REGION:ACE **STATE:**MO **LOCID:**MCI														
CITY:KANSAS CITY **AIRPORT:**KANSAS CITY INTL														
1990	3,390,318	87,078	3,477,396	108,696	33,200	16,676	1,113	159,685	1,160	1,095	2,255	161,940	279,301	0
1991	3,301,311	119,748	3,421,059	111,569	36,641	16,559	1,157	165,926	1,410	857	2,267	168,193	282,728	0
1992	3,500,457	180,563	3,681,020	110,356	49,265	14,783	1,125	175,529	719	506	1,225	176,754	292,793	0
1993	3,668,358	179,540	3,847,898	116,904	49,622	16,194	1,775	184,495	188	165	353	184,848	300,616	0
1994	4,163,761	194,234	4,357,995	127,146	52,107	17,265	1,390	197,908	332	34	366	198,274	313,458	0
1995	4,486,010	206,483	4,692,493	130,728	59,589	15,749	1,101	207,167	327	24	351	207,518	323,674	0
1996	4,763,072	203,938	4,967,010	125,388	55,691	14,001	978	196,058	326	21	347	196,405	313,079	0
1997	5,062,953	222,553	5,285,506	137,903	56,857	14,022	684	209,466	209	54	263	209,729	329,639	0
1998	5,235,043	218,902	5,453,945	134,671	62,607	11,407	547	209,232	121	8	129	209,361	330,016	0
1999	5,528,137	199,341	5,727,478	152,578	53,932	12,370	494	219,374	174	471	645	220,019	343,301	0
2000	5,669,593	184,384	5,853,977	162,224	44,307	11,930	623	219,084	269	35	304	219,388	334,373	0
2001	5,704,794	177,498	5,882,292	167,470	37,981	9,293	894	215,638	148	47	195	215,833	323,568	0
2002	5,124,081	163,771	5,287,852	149,983	35,965	8,027	934	194,909	145	56	201	195,110	326,401	0
2003	4,556,824	294,250	4,851,074	127,880	36,990	7,680	800	173,350	115	39	154	173,504	274,099	0
2004	4,569,964	435,512	5,005,476	129,578	31,900	8,640	658	170,776	0	0	0	170,776	290,460	0
2005	4,407,709	644,183	5,051,892	127,113	32,329	10,800	710	170,952	208	25	233	171,185	286,132	0
2006	4,537,427	797,553	5,334,980	125,280	35,787	15,370	832	177,269	121	147	268	177,537	285,341	0
2007	4,849,081	925,717	5,774,798	132,236	46,691	8,460	867	188,254	12	0	12	188,266	305,857	0
2008	4,532,981	1,053,188	5,586,169	125,567	55,781	6,981	649	188,978	14	0	14	188,992	299,430	0
2009	3,798,697	1,086,090	4,884,787	106,745	37,800	6,274	629	151,448	20	12	32	151,480	252,786	0
2010	3,673,933	1,256,656	4,930,589	106,106	33,220	5,416	821	145,563	8	2	10	145,573	243,416	0
2011	3,579,888	1,409,948	4,989,836	106,627	31,406	4,693	1,080	143,806	34	8	42	143,848	234,876	0
2012	3,612,945	1,328,416	4,941,361	100,028	31,084	4,032	797	135,941	2	0	2	135,943	227,196	0
2013	3,711,062	1,089,431	4,800,493	98,287	26,584	3,659	704	129,234	4	0	4	129,238	215,933	0
2014	3,873,073	1,051,929	4,925,002	101,194	21,501	3,726	872	127,293	0	10	10	127,303	215,608	3
2015	4,164,141	939,832	5,103,973	102,022	14,684	3,527	703	120,936	6	0	6	120,942	209,103	2
2016	4,499,944	830,979	5,330,923	107,820	9,533	3,286	687	121,326	60	8	68	121,394	211,004	2
2017*	4,768,524	815,087	5,583,611	114,619	5,081	3,422	571	123,693	104	103	207	123,900	214,297	2
2018*	4,885,113	831,776	5,716,889	116,139	5,090	3,225	571	125,025	104	103	207	125,232	215,857	2
2019*	4,994,768	849,723	5,844,491	119,057	4,702	3,225	571	127,555	104	103	207	127,762	218,792	2
2020*	5,092,656	865,603	5,958,259	121,758	4,239	3,225	571	129,793	104	103	207	130,000	221,396	2
2021*	5,184,954	880,503	6,065,457	124,470	3,589	3,225	571	131,855	104	103	207	132,062	223,766	2
2022*	5,276,846	895,332	6,172,178	127,201	2,906	3,225	571	133,903	104	103	207	134,110	226,116	2
2023*	5,366,751	909,878	6,276,629	129,611	2,596	3,225	571	136,003	104	103	207	136,210	228,614	2
2024*	5,456,459	924,430	6,380,889	131,798	2,579	3,225	571	138,173	104	103	207	138,380	231,269	2
2025*	5,546,091	938,937	6,485,028	133,951	2,604	3,225	571	140,351	104	103	207	140,558	233,950	2
2026*	5,638,765	953,873	6,592,638	136,172	2,629	3,225	571	142,597	104	103	207	142,804	236,704	2
2027*	5,736,525	969,376	6,705,901	138,488	2,654	3,225	571	144,938	104	103	207	145,145	239,561	2
2028*	5,838,292	985,521	6,823,813	140,896	2,680	3,225	571	147,372	104	103	207	147,579	242,517	2
2029*	5,941,703	1,001,983	6,943,686	143,345	2,706	3,225	571	149,847	104	103	207	150,054	245,524	2
2030*	6,045,727	1,018,557	7,064,284	145,810	2,732	3,225	571	152,338	104	103	207	152,545	248,549	2
2031*	6,148,974	1,034,972	7,183,946	148,258	2,758	3,225	571	154,812	104	103	207	155,019	251,559	2
2032*	6,251,929	1,051,205	7,303,134	150,693	2,785	3,225	571	157,274	104	103	207	157,481	254,559	2
2033*	6,352,938	1,067,107	7,420,045	153,085	2,812	3,225	571	159,693	104	103	207	159,900	257,515	2
2034*	6,458,027	1,083,646	7,541,673	155,571	2,839	3,225	571	162,206	104	103	207	162,413	260,575	2
2035*	6,566,879	1,100,823	7,667,702	158,146	2,867	3,225	571	164,809	104	103	207	165,016	263,731	2
2036*	6,677,489	1,118,262	7,795,751	160,761	2,895	3,225	571	167,452	104	103	207	167,659	266,934	2
2037*	6,786,551	1,135,400	7,921,951	163,340	2,923	3,225	571	170,059	104	103	207	170,266	270,101	2
2038*	6,896,784	1,152,726	8,049,510	165,948	2,951	3,225	571	172,695	104	103	207	172,902	273,303	2
2039*	7,010,272	1,170,536	8,180,808	168,630	2,980	3,225	571	175,406	104	103	207	175,613	276,586	2
2040*	7,125,625	1,188,567	8,314,192	171,353	3,009	3,225	571	178,158	104	103	207	178,365	279,914	2
2041*	7,243,180	1,206,966	8,450,146	174,129	3,038	3,225	571	180,963	104	103	207	181,170	283,301	2
2042*	7,361,681	1,225,417	8,587,098	176,925	3,068	3,225	571	183,789	104	103	207	183,996	286,713	2
2043*	7,482,918	1,244,216	8,727,134	179,781	3,098	3,225	571	186,675	104	103	207	186,882	290,190	2
2044*	7,607,333	1,263,393	8,870,726	182,698	3,128	3,225	571	189,622	104	103	207	189,829	293,736	2
2045*	7,734,568	1,282,929	9,017,497	185,676	3,158	3,225	571	192,630	104	103	207	192,837	297,348	2

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EXISTING FACILITIES LEGEND

NO.	FACILITY DESCRIPTION	TOP ELEV. (MSL)
101	Aero KC Cargo	995'
102	Joint Use Cargo	1,001'
103	KCI Air Cargo	994'
104	United States Postal Service	1,014'
106	FedEx Cargo	997'
107	Cross-Dock Cargo	990'
201	Commercial Aviation Fuel Tanks	994'
202	Allied Aviation Fueler Dispatch Facility	968'
203	Fuel Station	976'
301	General Aviation Fuel Farm	994'
302	General Aviation Terminal & Hangar	997'
303	Incinerator	992'
401	Terminal Building A - Closed	1,042'
402	Terminal Building B	1,046'
403	Terminal Building C	1,045'
501A	Snow Removal Equipment / ARFF Truck Maintenance	1,022'
501B	Vehicle Wash Facility	1,022'
501C	Vehicle Fuel Facility	1,022'
501D	Airfield Snow Removal Equipment Building	1,000'
502	Aviation Facilities Maintenance	992'
503	Field Maintenance	1,001'
504	Field Maintenance	1,001'
505	Salt Barn	1,011'
506	Cargo Apron Storm Runoff Tank	1,022'
507	Sand & Deicer Storage Facility	1,011'
508	Magazine Bunker (To Be Removed)	983'
605	Economy Lot Ticket Plaza	1,008'
606	Economy Lot Ticket Plaza	1,008'
607	Consolidated Rental Car Service Center Building	990'
608	Consolidated Rental Car Service Center Building	990'
609	Consolidated Rental Car Service Center Building	990'
610	Consolidated Rental Car Service Center Building	990'
611	Consolidated Rental Car Service Center Building	990'
612	Consolidated Rental Car Service Center Building	990'
613	Consolidated Rental Car Service Center Building	990'
614	Consolidated Rental Car Service Center Building	990'
615	Consolidated Rental Car Facility	990'
616	Consolidated Rental Car Facility (Customer Service Building)	990'
617	Rental Car / Bus Maintenance	992'
618	Rental Car / Bus Wash Facility	994'
619	Rental Car / Bus Fuel Depot	994'
620	Auto Service Station	990'
701	Pump Station No. 2	988'
702	Airport Police and Central Chilling Plant	1,017'
703	Parking Lot Maintenance Building	1,008'
704	Airline Commissary	1,000'
705	Airport Aviation Department Central Warehouse & Purchasing	1,008'
715	KCPL Substation	974'
716	Aircraft Rescue and Fire Fighting Station	1,040'
717A	Triturator	987'
718A	Parking and Bus Administration	990'
719B	Bus Shelter	990'
719C	Bus Shelter	990'
719	Airport Management Building	994'
720	Taxi Staging Area	1,017'
721	Pump Station No. 1	975'
722*	Park Air Express	1,026'
801	Maintenance Facility Superhanger	1,111'
802	Maintenance Facility Building #1	1,077'
803	Maintenance Facility Building #2	1,060'
804	KCPL Substation	1,010'
805	Central Utility Plant	1,032'
806	Water Tower	1,018'
807	Waste Treatment Plant	1,030'
808	Fuel Component Facility	1,038'
809	Jet Fuel Storage	1,047'
810	Storage Buildings	1,043'
811	Water Tanks	1,058'
812	Storage Building	1,008'
901	Coventry	1,052'
902	Marriott Hotel	1,053'
1001	Air Traffic Control Tower (Cab Floor 1,210')	1,240'
1002	Blount Building	1,038'
1004	Fire Station No. 16	1,017'
1005	Ambassador Building	1,372'
1006	Airfield Regulator Vault	1,007'
1007*	Logistics Centre II	1,098'

* Structure not included in AC 150/5300-18 AGIS survey database, 2012.

FUTURE PROJECTS LEGEND

(ID)	PROJECT DESCRIPTION	EST. MAX ELEVATION (EME)
A	Future Terminal Area	1,040'
B	Future Parking Garage Area	1,040'
C	Relocated Airfield Service Road	-
D	Proposed Manufacturing Facility	1,070'
E	Delivery Vehicle Staging	-
F	Airline Commissary Expansion	993'
G	Employee Parking Lot	-
H	Taxi/Limo Staging Area	-
I	Future Consolidated Airline Deicing Equipment Storage Area	997'
J	Future Consolidated Airline Deicing Fluid Tanks	995'
K	Aviation Facilities Maintenance Expansion	990'
L	Fuel Tank Expansion	985'
M	General Aviation Terminal Expansion	997'
N	General Aviation Auto-Parking Expansion	-
O	Commercial Development	1,098'
P	Terminal B Removed	-
Q	Future Magazine Building for MCI OSO	1,010'
R	Future Maintenance Building and Salt Dome	995'
S	Future Police Station	1,040'
T	Future ARFF Pavement Expansion	-
U	Future Post 1 Relocation	998'
V	Future ASSC Remote Unit Sites (Antennas)	varies
W	Future Post 28 Location and Guard Building	952'
X	Future Airport Police Building	905'
Y	Future Facilities Building and Salt Barn	970'

DRAWING LEGEND

EXISTING	DESCRIPTION	FUTURE
	Airport Property Line	
	Property to be Acquired	
	On-Airport Building	
	Terminal/Concourse/Garage	
	Runway Pavement	
	Taxiway Pavement	
	Airfield Apron Pavement	
	Airfield Pavement to Be Removed	
	Development Area	
	On-Airport Major Road/Pavement	
	Parking Lot / Large Paved Area	
	Off-Airport Road	
	Airport Reference Point (ARP)	
	Fence	
	Stream/Creek	
	High Power Electric Lines	
	On-Airport Property Water Retention/Detention	
	Potential Creek Swelling Area	
	Off-Airport Property leased	
	Rotating Beacon	
	Cemetery	
	Building Number	
	Primary/Secondary Airport Control Station	

CONDITIONAL APPROVAL

The approval indicated by my signature is given subject to the condition that the items identified in our approval letter dated April 21, 2015 may not be undertaken without prior written environmental approval by the Federal Aviation Administration. This approval action does not imply any commitment for Federal funding, or approval of future structures requiring notice under FAR Part 77.

Airports Planning Engineer — Date
FAA Central Region

RUNWAY END DATA TABLE

Runway End	Latitude	Longitude	Elevation (MSL)	Northing	Easting
1R	39°19'53.23"	94°42'32.39"	1017.2'	2729549.12	1134232.89
19L	39°18'24.73"	94°42'05.32"	979.5'	2731698.27	1143495.62
1L	39°17'36.00"	94°43'45.54"	1014.4'	2723808.46	1138573.83
19R	39°19'20.04"	94°43'14.78"	978.6'	2728252.33	1149093.49
Ultm South End	39°17'46.13"	94°44'38.59"	980.0'	2719640.95	1139615.08
Ultm North End	39°19'27.34"	94°44'09.60"	966.8'	2722017.05	1148842.89
9	39°17'27.08"	94°43'35.73"	1015.3'	2724577.12	1137871.06
27	39°17'17.07"	94°41'35.59"	1026.9'	2734020.01	1139834.65

NORTH IS NOT UP

1" = 1,000'
500' 0 1,000'
Graphic Scale in Feet

LEGEND OF TERMINOLOGY

ALS	Approach Lighting System	CAT	Category of Instrument Approach
ALSF-II	Approach Light System With Sequenced Flashing Lights (for ILS CAT II and CAT III Precision Approaches)	CL	Centerline
ARFF	Airport Rescue and Fire Fighting	DVOR/DME	Doppler Very High Frequency Omnirange with Distance Measuring Equipment
ARP	Airport Reference Point	GS	Glide Slope
ASDE	Airport Surface Detection Equipment	HIRL	High Intensity Runway Lights
ASR	Airport Surveillance Radar	ILS	Instrument Landing System
ASOS	Automated Surface Observation System	IM	Inner Marker
ATCT	Air Traffic Control Tower	LLWAS	Low Level Wind Shear Alert System
AWOS	Automated Weather Observing System	LOC	Localizer
BRL	Building Restriction Line - Based on 35' Ht	LOM	Compass Locator with Outer Marker
CA	Critical Area	MALSR	Medium Intensity Approach Light System including Runway Alignment Indicator Lights
MIRL	Medium Intensity Runway Lights	RAIL	Runway Alignment Indicator Lights
MM	Middle Marker	REIL	Runway End Identifier Lights
NPI	Non-Precision Instrumentation	RPU	Remote Power Unit
NPI-C	Non-Precision Instrumentation with Visibility Minimums Greater than 3/4 Mile	RPZ	Runway Protection Zone
OFA	Object Free Area	RSA	Runway Safety Area
OFA-E	Object Free Area - Extended	RTR	Remote Transmitter Receiver
OL	Obstruction Light	RVR	Runway Visual Range
OC	Obstruction Chart	RW	Runway
OM	Outer Marker	TDZ	Touchdown Zone
PAPI	Precision Approach Path Indicator	TOFA	Taxiway Object Free Area
PIR	Precision Instrument Approach	TW A-1	Taxiway Designation
POFZ	Precision Obstacle Free Zone	VASI	Visual Approach Slope Indicator
		VOR	Very High Frequency Omnirange
		WDI	Wind Direction Indicator
		WSK	Windsock

NOTES:
1. Unless otherwise noted all runway hold position marking are at 300 ft from the runway centerline.
2. Horizontal Datum is North American Datum 83 (NAD83) Missouri State Plane,West Zone, US Foot. Vertical Datum is North American Vertical Datum 88 (NAVD88).
3. Runway length derived from NGS Inverse3D as defined in AC 150/5300-18.
4. Modifications to Standards - None Required.
5. All RPZ's are owned in Fee Simple.
6. All elevations are in Mean Sea Level (MSL) unless otherwise noted.
7. The PACS/SACS locations depicted on the ALP are in the process of being approved by the National Oceanic and Atmospheric Administration's (NOAA's) National Geodetic Survey (NGS). The locations indicated are approximate and should not to be used until final approval by NOAA's NGS.

SOURCES:
1. Topography is based on aerial mapping provided by Quantum Spatial, Inc. 2012 (previously AeroMetric Inc.)
2. Obstacle Data is based upon AC 150/5300-18 survey provided by Quantum Spatial, Inc. 2012 (previously AeroMetric Inc.)

Revision Description	Date	By

KANSAS CITY AVIATION DEPARTMENT

KANSAS CITY INTERNATIONAL AIRPORT

JOB DESCRIPTION: AIRPORT LAYOUT PLAN

SHEET TITLE: FUTURE AIRPORT LAYOUT PLAN (1000 SCALE)

DESIGNED	DRAWN	CHECKED	APPROVED
	MJH	MSG	

SCALE: 1" = 1,000' — CONTR. NO.
DATE: April, 2015 — SHEET: 3 of 28

L&B

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Kansas City International Airport
Environmental Assessment, Section 106 Evaluation, and
Section 4(f) Statement

Appendix G



Appendix G Section 4(f) Statement

DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
FINAL SECTION 4(f) STATEMENT
KANSAS CITY INTERNATIONAL AIRPORT
KANSAS CITY, MISSOURI
FEBRUARY 2019

Changes between this document and the draft Section 4(f) Statement include: (1) consolidation of the Section 4(f) statement and Section 106 Evaluation/EA into one document, (2) minor editorial changes, changes for clarity, or provision of additional explanation, (3) updates to reflect consultation under Section 106 that has occurred since publication of the Draft Section 4(f) Statement, primarily, the FAA determination that the Kansas City International Airport is eligible for inclusion in the National Register of Historic Places (NRHP) and therefore would be considered a Section 4(f) resource. The boundaries of a potential KCI Historic District would encompass the airfield, the terminals, the Airport Police Station and Central Chilling Plant located in the center of the terminal complex, along with the associated access and circulation roadways, the earthen dam, and drainage control reservoir.

Contents

Appendix G Section 4(F) Statement G-3

G.1 Introduction G-3
G.2 Description of the Proposed Action G-3
G.3 Purpose of and Need for the Proposed Action G-5
G.4 Description of the Section 4(f) Resource G-6
G.5 Alternatives Analysis G-16
G.6 Least Overall Harm Analysis G-18
G.7 Least Overall Harm Summary G-25
G.8 Mitigation G-27
G.9 Coordination with the Public and with Agencies with Jurisdiction over the Section 4(f) Resource G-28
G.10 Availability of the Draft Section 4(f) Statement G-29
G.11 Section 4(f) Statement Conclusion G-30

List of Tables

TABLE G-1 LEAST OVERALL HARM ANALYSIS SUMMARY G-26
TABLE G-2 LOCATIONS FOR REVIEW OF THE DRAFT SECTION 4(F) STATEMENT G-29

List of Exhibits

EXHIBIT G-1 PROPOSED ACTION G-4

G.1 Introduction

Section 4(f) of the Department of Transportation (DOT) Act of 1966 prevents the transportation use of land, including significant publically owned parks, recreation areas, or wildlife and waterfowl refuges. It also prevents the transportation use of an historic site of national, state, or local significance, The Secretary of Transportation may approve a transportation project requiring the use of such land if, after a full evaluation, it is evident that there is no feasible and prudent alternative to using that land and the project includes all possible planning to minimize harm resulting from the use. Section 4(f) of the Department of Transportation Act of 1966 is currently codified as 49 U.S.C. Section 303. This Statement will refer to 49 U.S.C. Section 303 as Section 4(f).

This Section 4(f) Statement addresses the proposed Replacement Terminal Project and other associated projects (the Proposed Action) at the Kansas City International Airport (KCI or Airport) in Platte County, Kansas City, Missouri. The City of Kansas City, Missouri, (City), is the owner of KCI and the City of Kansas City, Missouri, Aviation Department (KCAD) is responsible for the operations of KCI. The implementation of the Proposed Action would result in the physical use of a Section 4(f) resource.

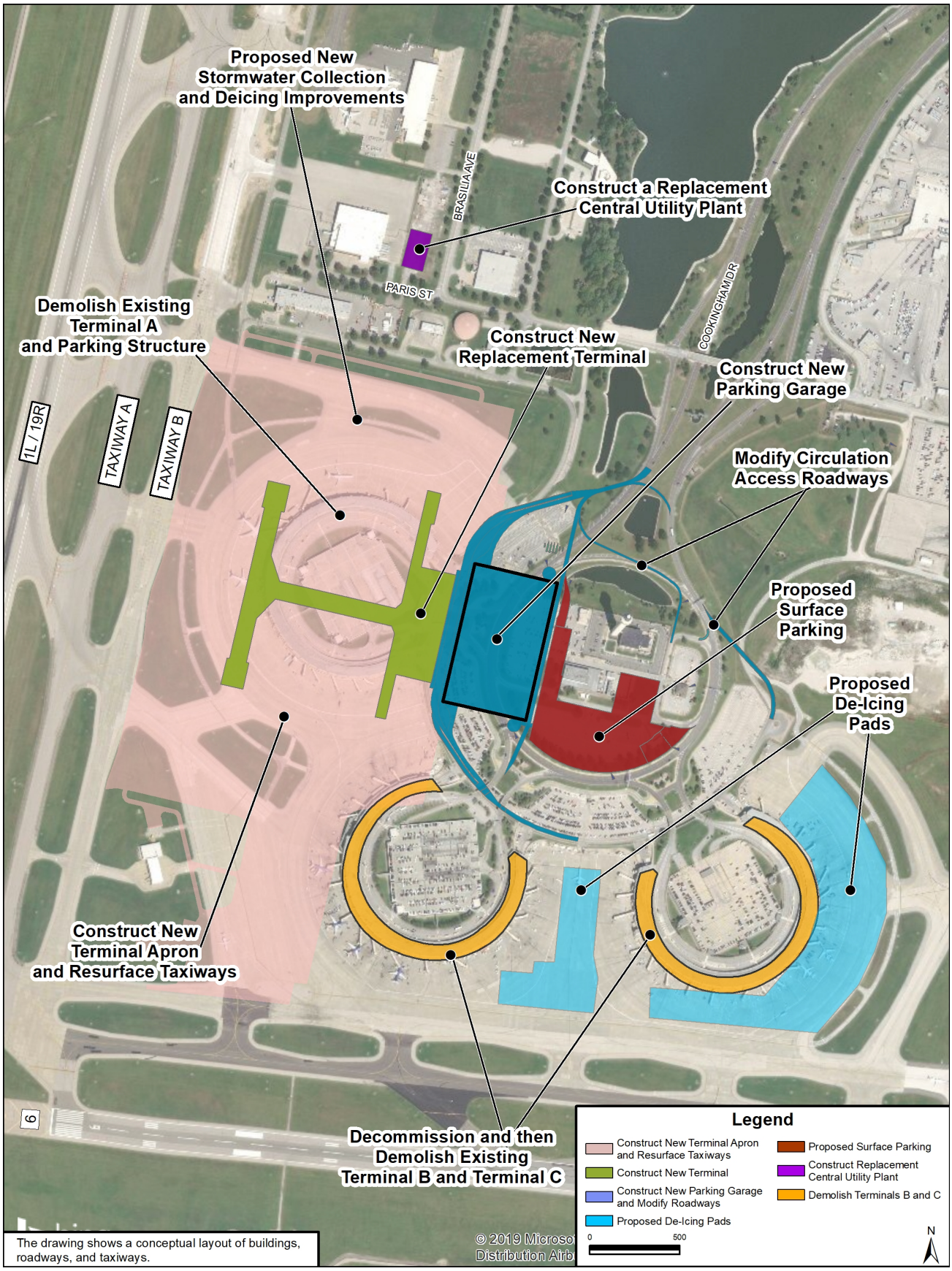
This Section 4(f) Statement provides the required documentation to demonstrate that there is no prudent and feasible alternative to using Section 4(f) resources in the form of historic properties. This evaluation also outlines the coordination that has occurred and the measures proposed to mitigate the physical use of the Section 4(f) resources.

G.2 Description of the Proposed Action

The Proposed Action as shown on **Exhibit G-1** consists of the development and operation of a replacement terminal at KCI. The Proposed Action includes the following major elements:

- Demolish existing Terminal A, including the Terminal A parking garage and aircraft apron;
- Construct new replacement terminal (initial build to 39 gates, future 42 gates) and provide updated utilities including water lines;
- Construct new parking garage and surface parking lot;
- Construct new terminal apron area around replacement terminal including new fuel hydrants;
- Modify existing roadways and construct new roadways in the terminal area;
- Construct various storm water collection system improvements including improved glycol recovery system (deicing) and facilities;
- Construct replacement Central Utility Plant (CUP) and provide redundant electrical underground electrical power utility feed;
- Resurface and rehabilitate the taxiways in the vicinity of the replacement terminal; and,
- Decommission and demolish existing Terminal B and Terminal C and consolidate airline operations at the new replacement terminal (Terminal B and C would remain open during construction of the new terminal).

Exhibit G-1 Proposed Action



The Proposed Action is anticipated to provide 39 gates upon opening with potential future expansion to 42 gates. Therefore, the Proposed Action would have less gates than that of the existing Terminals A, B, and C. The Proposed Action would occur completely on Airport-owned property and would not include any highway or rail improvements. The Terminal B and C demolition sites would remain vacant with appropriate ground cover. The Terminal B and C parking lots would remain operational for employee parking and/or customer parking. A new security fence would be constructed to divide the parking area from the airport operations area.

G.3 Purpose of and Need for the Proposed Action

The purpose of the Proposed Action is to provide a better customer experience for passengers. In addition, the purpose of the Proposed Action is to ensure continued safe, secure, and efficient airport operations by providing space for current and potential future demand while avoiding duplication of services and systems.

The following statements present the problems or needs being addressed.

Improve Passenger Experience

The 2008 Master Plan Update for KCI identified the need for an updated passenger terminal complex to provide a passenger processing facility that would meet and exceed customer service expectations. Terminal A has 21 gates available and totals 353,300 square feet. Terminal B has 19 gates and totals 389,000 square feet. Terminal C has 22 gates and totals 362,800 square feet. Therefore, KCI currently has the potential for 62 gates. Currently, passengers circulate through each terminal by means of a pedestrian corridor situated outside of security screening that varies in width from 15 feet to 25 feet and runs the entire length of each terminal building. Once inside, most passenger services, such as concessions, hotel and shuttle kiosks, guest seating and restrooms, can be found on the side of the corridor closest to the curbfront. Airline services, such as ticketing, baggage handling, and hold rooms and security, are typically located on the side of the corridor closest to the aircraft apron, with a few minor exceptions. In each terminal, the circulation corridor is outside of the security checkpoints and there is no similar corridor on the hold room side beyond the security screening. Consequently, passengers are essentially “locked” once they enter into an airline’s seating areas and cannot pass through to other parts of the terminal. Furthermore, there is no means to transfer between terminals without exiting security and re-screening at the other terminal. The existing terminals have a lack of adequate restrooms, restaurants, shopping, and lounges.

All three terminals received interior renovations in 2004. However, the existing terminals would require extensive and expensive work to improve public accessibility, passenger processing, and update utility infrastructure.[2]

[2] None of the utility infrastructure under and entering into the existing terminals were replaced in 2004. The underground utility feeds were 36 years old at the time of the 2008 Master Plan Update and would be nearing 50 years in 2020

Increase efficiency and reduce costs of operations

Currently, Terminals A, B, and C are configured internally to operate in a separate but identical manner. Security-related updates have been occurring at KCI since the opening of the terminals due to several airline hijackings occurring in the aviation industry in the 1970's. These included the screening of passengers with metal detectors and physical separation of ticketed passengers from non-ticketed passengers in the terminals. Additional security requirements implemented after the terrorist attacks on September 11, 2001 have required further modifications.

These security updates were difficult to achieve in the KCI terminals due to the space available and the limitation of the design of the terminals. As a result, interior modifications were implemented to provide separate security screening locations for small groups of gates. In addition, glass walls were constructed to keep screened passengers from being able to receive items from non-screened passengers. The shallow depth of the terminal concourse from the gate to the front door of the terminal is a significant challenge in the effort to ensure safety and security of the passengers and the aircraft.

Currently KCAD must incur operating and maintenance costs for three separate but identical Terminals. Terminal A is not being used for aircraft or passenger operations and is effectively mothballed, however KCAD continues to incur costs to maintain and secure these facilities. All three terminals are individually heated and cooled.

G.4 Description of the Section 4(f) Resource

The FAA has determined and the State of Missouri Department of Natural Resources State Historic Preservation Office (SHPO) has concurred that the Kansas City International Airport is eligible for inclusion in the National Register of Historic Places (NRHP) as a district significant under Criteria A and C and therefore would be considered a Department of Transportation Section 4(f) resource. Criteria A in the area of Transportation refers to the Airport's significance for its association with the Jet Age and with Kansas City's efforts to retain TWA as a major employer in the region. Criteria C refers to the Airport's significance for architecture as a work of the prominent Kansas City architectural firm of Kivett and Myers embodying distinctive characteristics of the Brutalist architectural style and for its innovative "Drive-to-the-Gate" configuration.

Original Plan

The original plan for the Airport's terminals consisted of four buildings (three were ultimately built), each serving 15 aircraft positions, arranged contiguous to a circular looped entrance roadway. The airport entrance road entered the complex and fed onto the one-way circular loop road passing each of the terminals. Each building is in the form of a circular concourse structure. Fifteen aircraft positions were provided around the outside of the circular building, which in turn, surrounded a great percentage of the required parking area for the terminal.

The original plan showed the unit terminal buildings connected by an enclosed concourse to be constructed at some future date to provide sheltered walkways between the terminals and/or the parking areas. It was thought that these walkways could someday be replaced by an automated shuttle device. These walkways were never built and passenger flow between buildings was accomplished by shuttle buses utilizing the road system.

The terminals were developed to produce the “drive-to-the-gate” capability for a great percentage of the passengers. The plan permits the passenger, if driven to the airport, to arrive virtually at the door of the aircraft. The enplaning and deplaning curb is directly across a narrow concourse from the aircraft position. The passenger driving his own car is able to park nearby and with a relatively short walk be at the aircraft position. Ticketing and baggage facilities are located at short intervals along the building to minimize lateral movement. The plan was designed to achieve passenger convenience, in terms of walking distance, to a far greater degree than any comparable terminal facility at that time that did not utilize a form of passenger transfer device.

Site

KCI, originally known as Mid-Continent International Airport (MCI), represents the transition from the early days of commercial aviation, when airports were often sited close to downtown commercial districts, to the Jet Age, when the need for longer runways and distance from residential areas prompted consideration of locations in undeveloped areas farther from urban centers. The land now occupied by KCI was annexed into the Kansas City limits in 1953 prior to development of the airfield. This site was chosen in part because the surrounding area was largely undeveloped and the open space provided a buffer to jet aircraft noise.

Construction of two runways, an air traffic control tower and a new maintenance facility for Trans World Airways (TWA), then headquartered in Kansas City, began in 1954, and MCI and the TWA Overhaul Base both opened in 1957. However, the new MCI airport did not serve commercial passenger airlines until 1972. In the interim, Kansas City’s Municipal Airport served as the passenger airport for the area. When it was completed in 1972, KCI was one of the country’s largest airports and the showplace for TWA.

In 1966, after the FAA determined that Municipal Airport was unsafe for large jet aircraft, Kansas City’s main airport was moved to MCI. The City hired Kivett & Myers, architects, and the engineering firm Burns & McDonnell to prepare concepts for a new terminal complex at MCI. The final design, selected with the support of TWA, aimed to streamline the passenger experience by minimizing the distance from curbside to aircraft boarding gate. Construction began in 1968, and MCI officially opened for passenger service on November 11, 1972. The new terminals were sited within the existing airfield and oriented around the original air traffic control tower.

Although the original design contemplated four separate terminals, only three – Terminals A, B and C – were constructed. The terminals were constructed as nodes around International Circle, in the center of which was located a combined Airport Police Station and Central Chilling Plant, designed by Burns & McDonnell with Sharpe and Kidde in the Brutalist style (this area was also the location of the original air traffic control tower). Three one-way loop roads providing access to the terminal buildings: Amsterdam Circle to Terminal A, Rome Circle to Terminal B, and Beirut Circle to Terminal C. Surface parking was located within the loop road of each terminal, and a system of access roads, named for other foreign destinations, echoed the international theme.

Also dating to 1972 are a Burns & McDonnell-designed drainage control reservoir and earthen dam; a USPS facility in a modern commercial style, attributed to Kivett & Myers; an Airport Aviation Department Central Warehouse and Purchasing facility in a modern industrial style and the Aero KC Cargo facility

Only a small portion of the total airport property has been developed for the airport facilities over the past sixty-five years, and the surrounding acreage remains primarily open land.

Architecture

Three identical horseshoe-shaped buildings form the airport terminal complex. The current air traffic control tower replaced the original tower in 1994. Each terminal measures 2,300 feet long and 65 feet tall, enclosing roughly 80 percent of a circle that measures 1,000 feet in diameter. The original depth of each terminal was 75 feet, but was expanded to varying depths with the maximum being 90 feet. The primary passenger level is accessible from the landside access road. This level houses passenger gates, baggage claim, and concessions. Construction began in 1968 and was complete at the end of 1972.

The geometric forms of the terminals and the textured concrete surfaces express the Brutalist architectural style. Drawing on the modernist architectural movement, the Brutalist architectural style flourished from the 1950s to the mid-1970s. Physical characteristics of Brutalist architecture include very linear, fortress like and blockish structures, often with a predominance of concrete construction.

The original vision of air travel for the Airport did not take into account new FAA security procedures necessitated by a spate of commercial aircraft hijackings in the late 1960s and ’70s, which changed the airline passenger experience forever. Following the imposition of mandatory screening in February 1972 and the Anti-Hijacking Act of 1974, passengers were barred from the aircraft unless they consented to a search and metal detectors or pat downs became a standard part of air travel. Security upgrades were made to the initial terminals beginning within months after the airport opened. As early as 1974, eight-foot tall glass partitions were installed to enclose gate lounges. More comprehensive airport upgrades at the turn of the twenty-first century replaced the original air traffic control tower and updated interior terminal finishes and glazing. The changes also addressed post-9/11 security requirements by bundling gates to reduce the number of security check points. While passengers now walk more than 100 feet between curb and plane, that distance remains significantly shorter than in most airports.

The KCI terminals originally opened with surface parking lots inside the three circles. Today, tiered parking structures (Terminal A - 1988, Terminal B – 1991, Terminal C - 1997) surrounded by a grassy moat are located at the center of each terminal loop. The top level of each parking structure is at-grade with the road and terminal. Walkways across the gap lead pedestrians from parking garage to terminal.

Aside from the existing original exposed concrete structure, most interior finishes reflect the Terminal Improvement Program, a $258 million airport upgrade of all three terminals completed in 2004. This work included:

- Replaced lighting and building mechanical, electrical and plumbing systems.
- New terrazzo floors
- All exterior glazing was replaced as a result, no original glass or glazing elements remain
- Added limited restrooms and concessions inside the passenger holding areas
- Blast resistant glazing was installed on the landside, security screening walls, and airsides of the terminals
- Increased the size of each vestibules
- Additional space for concessions on the landside with some minor concession locations on the airside
- More public seating on the landside
- New and more functional directional wayfinding signage
- Relocated mechanical ductwork
- New finishes throughout
- New inbound baggage handling system and claim devices and updated arrivals/departure screens
- New Airline ticketing counters of a common design with task lighting in lowered eyebrows above the ticket counters in the two story spaces
- Removed the landside entry soffit and continuous back lit sign band and added more windows for increased interior daylighting
- Departure Lounge security walls were raised from 8 feet high to 12 feet high
- A common design for ticket counters that includes sunshade devices

The 2004 improvements also addressed post-9/11 changes to airport security. To reduce the number of security checkpoints, multiple gates were bundled into larger waiting lounges on the airside of the terminal but still 14 separate security screening checkpoints are required to process passengers. Twelve-foot tall partitions enclose the waiting lounges. The partitions are constructed of storefront framing filled with solid panels and upper glazing. Within the partitions, each gate area is a large open space filled with rows of conjoined seating. More recently concession stands and restrooms have been added at the ends of most gate areas.

Architect

The local architectural firm of Kivett & Myers, specifically Clarence Kivett, was the architect of record for the KCI passenger terminals. Kivett & Meyers was prolific in Kansas City during the second half of the twentieth century. Established in 1940 by Clarence Kivett and Ralph Myers, the firm thrived for thirty years. Its ability to embrace opportunities provided by external circumstance was paired with innate skill and a highly-cultivated philosophy that combined creativity and flexibility to achieve good design and please clients. Kansas City's leading architectural design firm after World War II, Kivett & Myers produced a broad spectrum of projects, including some of Kansas City's most notable structures. Growing from less than ten employees to almost one hundred employees at its peak, the firm's popularity grew with the acceptance of Modern Movement architecture. Throughout the firm's history Kivett & Myers maintained a philosophy based on purity of form, structural expression and technological innovation that resulted in a high degree of stylistic consistency.

Comparable Airport Terminals

The opening of the terminals at KCI were immediately followed by hijacking events that greatly altered planners thinking about security, which in turn resulted in the need for centralized security serving larger concourses with the ability to provide adequately sized passenger holdrooms, choices of food and beverage and retail concessions, and other services beyond security checkpoints. Additionally, the recession of the 1970's combined with escalating fuel costs forced the airlines to reevaluate their business operating model which ushered in the "hub and spoke" era which required that a "hub" airport terminal to efficiently move large volumes of connecting passengers between arriving and departing flights. As major airlines, like Trans World Airline transitioned to the "hubbing" operating principle in the late 70's, the "drive-to-gate" concept became obsolete for TWA's vision of a major airport in their route system since the three separate unit terminals were never designed to efficiently move connecting passengers and baggage.

The poured in-place concrete terminals at KCI with their two and four gate modules and narrow depth of only 75 feet were designed and constructed in such a manner that upgrades to efficiently deal with the airlines' operational changes and new security requirements were difficult. The result is that new passenger terminals built after the early 1970's moved away from the planning and design principles that were specifically incorporated into the KCI terminals because they were no longer compatible with current day thinking regarding passenger processing and security. However, there is one comparable passenger terminal in the US at Dallas/Fort Worth International Airport that was being designed and constructed at the same time as KCI's terminals and reflects similar design concepts in terms of passenger processing.

Evaluation of Historic District

Although the terminal buildings are individually eligible for listing in the NRHP, the interrelationship of the terminals with the airside facilities (runways, taxiways and aprons), groundside circulation features, and airport support facilities is best understood within the framework of a historic district.

The boundaries of a potential KCI Historic District would encompass the airfield, the terminals, the Airport Police Station and Central Chilling Plant located in the center of the terminal complex, along with the associated access and circulation roadways, the earthen dam, and drainage control reservoir. These buildings and structures form a significant and cohesive linkage that collectively convey the historic and architectural significance of KCI.

Of the buildings within this potential district, the three terminals and the Airport Police Station/Central Chilling Plant contribute to both its architectural and historic significance. Of the other buildings constructed in 1972, the Airport Aviation Department Central Warehouse and Purchasing facility may contribute; the Aero KC Cargo facility was significantly modified in 1987 and no longer contributes to an eligible district due to loss of integrity. The USPS building, located on the periphery of the terminal complex, also would be within these boundaries and likely would be considered a contributing building but may be best evaluated in the national context of postal facilities constructed in the 1970s.

The earthen dam and reservoir and roadway system dating to 1972 would be contributing structures, as would those portions of the airfield constructed prior to 1972 that retain integrity. The original terminal parking lots were altered when underground parking garages were constructed at Terminal A (1989), Terminal B (1991), and Terminal C (1999) and do not contribute to the historic district. Throughout the years, the circulation access roads have been enlarged, redirected and repaved to accommodate

increase in vehicular traffic but still display the pattern of interlocking rings characteristic of the original layout and thus would likely be considered as contributing elements but not individually eligible for the NRHP. Other landscape features may be part of the setting.

The original airfield layout is an integral part of this district, although modifications and repairs over time have affected its integrity. The west parallel runway (Runway 1L-19R) was constructed between 1954 and 1955 to a length of 6,000 feet, extended to 9,000 feet in 1958, and extended to 10,800 feet in 1970. The crosswind runway (Runway 9-27) was constructed between 1968 and 1972. The east parallel runway (Runway 1R-19L) would be a non-contributing element as it was constructed between 1993 and 1994.

The period of significance for this district would begin in 1957, with the opening of MCI, and extend through the opening of the terminal complex in 1972.

G.4.1 Name of Owner and Type of Section 4(f) Property

The City of Kansas City, Missouri (City) is the owner and the City of Kansas City, Missouri, Aviation Department (KCAD) is responsible for the operations of KCI including Terminals A, B, and C. Currently only Terminals B and C are used for aircraft and passenger operations.

G.4.2 Size

The terminal facilities consist of three semicircular (C-shaped) passenger terminal buildings. The terminal buildings are lightweight concrete structures, each approximately 2,300 feet long by 85 feet wide. Typically, they have three levels: apron, passenger service, and mezzanine. Nearly all passenger functions (ticketing, concessions, hold rooms, baggage, etc.) are located on the passenger service level. Mezzanines are located only in certain sections of the terminal building and thus account for the least amount of square footage among the three levels. The terminal curbfront connects to the building at the passenger service level on all three terminals. Terminal A totals 353,300 square feet, Terminal B totals 389,000 square feet, and Terminal C totals 362,800 square feet. All three terminals were designed to work as a system but each has independent utility allowing for the deactivation/removal of any one of the terminals. For example, the Airport is able to continue aircraft and passenger operations even with the current de-activation of Terminal A.

G.4.3 Visual Information

The geometric forms of the terminals and the textured concrete surfaces express the Brutalist architectural style. Physical characteristics of Brutalist architecture include linear, fortress like and blockish structures, often with a predominance of concrete construction. Initially the style came about for government buildings, low-rent housing, and shopping centers to create functional structures at a low cost, but eventually designers adopted the look for other uses such as college buildings and other commercial facilities. For the KCI terminals, the architects combined the light-colored concrete with ample glazing, high ceiling, and wood elements to help soften the interior of the cold look and feel of the exposed concrete structure. Even today, the exposed ceiling inside the terminals reveal a honeycomb grid. All three terminals received interior renovations in 2004.

G.4.4 Access and Uses

LP Cookingham Drive provides direct access to the Airport's central terminal core and all three terminals. Terminals A, B, and C are configured internally to operate in an identical manner. Currently, passengers circulate through each terminal by means of a pedestrian corridor situated outside of security screening that varies in width from 15 feet to 25 feet and runs the entire length of each terminal building. Once inside, most passenger services, such as concessions, hotel and shuttle kiosks, guest seating and restrooms, can be found on the side of the corridor closest to the curbfront.

Airline services, such as ticketing, baggage handling, and hold rooms and security, are typically located on the side of the corridor closest to the aircraft apron, with a few minor exceptions. In each terminal, the circulation corridor is outside of the security checkpoints and there is no similar corridor on the hold room side beyond the security screening. Consequently, passengers are essentially "locked" once they enter into an airline's seating areas and cannot pass through to other parts of the terminal. Furthermore, there is no means to transfer between terminals without exiting security and re-screening at the other terminal. The existing terminals have a lack of adequate restrooms, restaurants, shopping, and lounges.

The new security requirements were difficult to achieve in the KCI terminals due to the limitation of the design of the terminals. As a result, interior modifications were implemented to provide separate security screening locations for small groups of gates. In addition, glass walls were constructed to keep screened passengers from being able to receive items from non-screened passengers. The shallow depth of the terminal concourse from the gate to the front door of the terminal is a significant challenge in the effort to ensure safety and security of the passengers and the aircraft.

G.4.5 Associated Areas

In the center of each semi-circle terminal is a tri-level parking garage that connects to the terminal via an underground pedestrian tunnel. The upper level of each parking garage is also connected to the main terminal at limited locations by way of pedestrian bridges and walkways that cross the access roadways.









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G.5 Alternatives Analysis

G.5.1 Feasible and Prudent Analysis

This section provides the analysis to determine if there are any feasible and prudent alternatives that would completely avoid the use of the Section 4(f) resource. According to the FHWA/FTA regulation at 23 CFR § 774.17:

(1) A feasible and prudent alternative is one that avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweighs the importance of protecting the Section 4(f) property. In assessing the importance of protecting the Section 4(f) property, it is appropriate to consider the relative value of the resource to the preservation of purpose of the statue.

(2) An alternative is not feasible if it cannot be built as a matter of sound engineering judgment.

(3) An alternative is not prudent if:

(i) It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;

(ii) It results in unacceptable safety or operational problems;

(iii) After reasonable mitigation, it still causes:

(A) Severe social, economic, or environmental impacts;

(B) Severe disruption to established communities;

(C) Severe disproportionate impacts to minority or low income populations; or

(D) Severe impacts to environmental resources protected under other Federal statutes;

(iv) It results in additional construction, maintenance, or operational costs of an extraordinary magnitude;

(v) It causes other unique problems or unusual factors; or

(vi) It involves multiple factors in paragraphs (3)(i) through (3)(v), that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.

A preliminary review of various avoidance alternatives was conducted. The review included identifying alternatives that would use other airports for terminal operations and the no action alternative. The use of other airports in the region was examined to determine if the relocation of passenger operations to another airport would satisfy the purpose and need. However, due to lack of proper passenger terminal facilities (terminal buildings, baggage services, fueling facilities, utility infrastructure, and parking) to support passenger service in nearby airports such as the Charles B. Wheeler Downtown Airport (old Municipal Airport), significant investment would be needed to improve both terminal and runway facilities to support the number and type of operations being conducted at KCI. This would result in additional construction, maintenance, or operational costs of an extraordinary magnitude since not only terminal facilities would need to be upgraded but also airfield and all supporting systems would need to be improved. In addition, use of other airports would not meet the stated purpose and need to improve

the passenger experience and to ensure continued safe, secure, and efficient airport operations by providing space for current and potential future demand while avoiding duplication of services and systems. For these reasons, the use of other airports was not considered a viable avoidance alternative.

Other alternatives at KCI were developed that did meet the purpose and need. However, all of these alternatives would involve a use of a 4(f) resource because each alternative would involve demolishing at least one of the terminals except for the No Action Alternative. All of the alternatives that would involve a use of a 4(f) resource are described in more detail in the Least Overall Harm Analysis. Therefore, only the No Action Alternative was evaluated in detail for the feasible and prudent analysis.

Alternative 1: No Action Alternative

Description: With the No Action Alternative, no changes would be made from the existing conditions and the terminals would remain as they are today. Terminal A would remain de-activated and aircraft and passenger operations would continue at Terminal B and C.

Feasible and Prudent Evaluation:

- The No Action Alternative would continue operations as they are today, therefore this alternative would be feasible.
- The No Action Alternative would avoid a physical use of the Section 4(f) resource, as no changes to the existing terminals would be made.
- The No Action Alternative however, would not meet the purpose of the project to provide a better customer experience for passengers and to ensure continued safe, secure, and efficient airport operations by providing space for current and potential future demand while avoiding duplication of services and systems.
- The No Action Alternative would result in unacceptable safety and operational problems. KCAD would continue to incur operating and maintenance costs for three separate but identical Terminals. Terminal A is not being used for aircraft or passenger operations and is effectively mothballed, however KCAD would have to continue to incur costs to maintain and secure these facilities under this alternative. All three terminals are individually heated and cooled. In addition, the No Action Alternative provides a significant challenge in the effort to ensure safety and security of the passengers and the aircraft due to the shallow depth of the terminal concourse from the gate to the front door of the terminal.

Summary: The No Action Alternative is feasible, but is not prudent per 23 CFR § 774.17. There are no feasible and prudent alternatives that completely avoid the Section 4(f) resource.

G.6 Least Overall Harm Analysis

When there are no feasible and prudent alternatives that avoids the Section 4(f) resource, the FAA must select an alternative from among those that use a Section 4(f) resource. However, the FAA must select the alternative that "causes the least overall harm in light of the statute's preservationist purpose."[3] This section provides the analysis to determine which alternative would cause the "least overall harm". The least overall harm is determined by balancing the following factors:

(i) The ability to mitigate adverse impacts to each Section 4(f) property (including any measures that result in benefits to the property);

(ii) The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection;

(iii) The relative significance of each Section 4(f) property;

(iv) The views of the official(s) with jurisdiction over each Section 4(f) property;

(v) The degree to which each alternative meets the purpose and need for the project;

(vi) After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f); and

(vii) Substantial differences in costs among the alternatives.

Alternative 2: Renovate the Existing Terminals with Two New Central Processors for Terminals A and B

Description: Alternative 2 would reuse two of the existing terminals, Terminals A and B. Terminal A and B would be renovated to include two new separate central processors, one for each terminal. The two new separate central processors would allow adequate space for security screening. This alternative would reuse some of the existing terminal approach and recirculation roadways, and the aircraft aprons. The renovation to Terminal A would be initiated first. Operations from Terminal B would then be transferred to the renovated Terminal A while Terminal B was renovated. Finally, operations from Terminal C would be transferred to the renovated Terminal B. This alternative would result in the de-activation and ultimate demolition of Terminal C and the reactivation of a renovated Terminal A and B.

Least Overall Harm Evaluation:

- Alternative 2 would not meet the need of the project because it would not reduce operational costs by avoiding duplication of terminal systems.
- Alternative 2 would result in major renovations to both Terminal A and B. As mentioned above under Section 4, the Airport is considered eligible for listing on the NRHP as a potential historic district under Criteria A Transportation for the Airport's significance for its innovative "Drive-to-Gate" concept and Criteria C for the Airport's significance for its architecture. This renovation would negate the "Drive to Gate" concept. The original terminal plan permitted the passenger to arrive virtually at the door of the aircraft. The enplaning and deplaning curb was

[3] 23 CFR § 774.3(c)(1); see also FAA 1050.1F Desk Reference, Paragraph 5.3.4.

directly across a narrow concourse from the aircraft position. However, with the major renovation all passengers would be processed at two new central locations and then would have to walk to their gate, dramatically increasing the distance a passenger would have to walk. In addition, due to the major renovation of the terminals, KCI's significance for its architecture and architect would be negated. Major renovations to accommodate the two new central processors would impact and change large portions of the original exposed concrete structures including the honeycomb grid ceiling. The Kivett and Myers design based on purity of form and stylistic consistency would be compromised, as new architects would be required to infuse the old structure with the new major renovations. This major change would likely constitute an adverse impact under Section 106 and a physical use to a Section 4(f) resource the same as if it were demolished.

- Alternative 2 would result in a physical use of a Section 4(f) resource with the eventual demolition of Terminal C. Terminal C would eventually have to be demolished because it could not be reused for other airport services or repurposed for other non-aeronautical uses. A continual mothballing of the terminal that would not be used for aeronautical purposes and generating revenue would not be economically feasible for KCAD. The terminal is located on the apron which has significant federal investment, and in an area designated for aeronautical land use with excellent access to the airfield. However, there is no entity such as a fixed based operator, cargo operator, or general aviation company that could use the terminal for any other aeronautical use as it stands today, without extensive renovation. This renovation likely would constitute an adverse impact under Section 106 and a physical use to a Section 4(f) resource the same as if it were demolished. Due to the location of the terminal next to an active airfield, the terminal could not be repurposed for non-aeronautical use due to safety, security, and other non-compatible land use concerns. Re-use of the terminal building for a non-aeronautical purpose would require FAA approval. Because of the location and access to the airfield for possible future aeronautical uses and prior federal investment, it is not likely that the FAA would provide the necessary approval.

- Other than the renovations to Terminals A and B and the demolition of Terminal C, there would be no other impacts to resources contributing to the historic district.

- There are no mitigation measures under this alternative that would avoid the physical use of a Section 4(f) resource.

- Alternative 2 would result in substantial differences in costs as compared to the single replacement terminal alternatives. As described in the 2017 Exhibit K Overview the renovation of the existing terminals with two new central processors for Terminals A and B would cost approximately $1.191 billion dollars as compared to approximately $964 million dollars for the Proposed Action.[4] The renovated terminal complex would still not provide the same passenger level of service as a new terminal.

[4] See discussion of Major Renovation Alternative A (MR A) and Exhibit 16 Conceptual Cost Estimates for Major Facility Components available online at http://www.flykci.com/newsroom/terminal-master-plan/

Alternative 3: Renovate the Existing Terminals with One New Central Processor for Terminals A and B

Description: Alternative 3 would reuse two of the existing terminals, Terminals A and B. Terminal A and B would be renovated with a new central processor for both of the terminals. The new central processor would allow adequate space for security screening. This alternative would reuse some of the terminal approach and recirculation roadways, and the aircraft aprons. The renovation to Terminal A would be initiated first. However, both Terminal A and B would be closed for major renovations for a period of time leaving only Terminal C in operation. After the renovations were complete, this alternative would result in the de-activation and ultimate demolition of Terminal C and the reactivation of a renovated Terminal A and B.

Least Overall Harm Evaluation:

- Alternative 3 would not meet the need of the project because it would not reduce operational costs by avoiding duplication of terminal systems.
- Alternative 3 would result in major renovations to both Terminal A and B. As mentioned above under Section 4, the Airport is considered eligible for listing on the NRHP as a potential historic district under Criteria A Transportation for the Airport's significance for its innovative "Drive-to-Gate" concept and Criteria C for the Airport's significance for its architecture. This renovation would negate the "Drive to Gate" concept. The original terminal plan permitted the passenger to arrive virtually at the door of the aircraft. The enplaning and deplaning curb was directly across a narrow concourse from the aircraft position. However, with the major renovation all passengers would be processed at one new central location and then would have to walk to their gate, dramatically increasing the distance a passenger would have to walk. In addition, due to the major renovation of the terminals, KCI's significance for its architecture and architect would be negated. Major renovations to accommodate the one new central processor would impact and change large portions of the original exposed concrete structures including the honeycomb grid ceiling. The Kivett and Myers design based on purity of form and stylistic consistency would be compromised, as new architects would be required to infuse the old structure with the new major renovations. This major change would likely constitute an adverse impact under Section 106 and a physical use to a Section 4(f) resource the same as if it were demolished.
- Alternative 3 would result in a physical use of a Section 4(f) resource with the eventual demolition of Terminal C. Terminal C would eventually have to be demolished because it could not be reused for other airport services or repurposed for other non-aeronautical uses. A continual mothballing of the terminal that would not be used for aeronautical purposes and generating revenue would not be economically feasible for KCAD. The terminal is located on the apron which as significant federal investment, and in an area designated for aeronautical land use with excellent access to the airfield. However, there is no entity such as a fixed based operator, cargo operator, or general aviation company that could use the terminal for any other aeronautical use as it stands today, without extensive renovation. This renovation likely would constitute an adverse impact under Section 106 and a physical use to a Section 4(f) resource the same as if it were demolished. Due to the location of the terminal next to an active airfield, the terminal could not be repurposed for non-aeronautical use due to safety, security, and other non-compatible land use concerns. Re-use of the terminal building for a non-aeronautical purpose would require FAA approval.

Because of the location and access to the airfield for possible future aeronautical uses and prior federal investment, it is not likely that the FAA would provide the necessary approval.

- Other than the renovations to Terminals A and B and the demolition of Terminal C, there would be no other impacts to resources contributing to the historic district.
- There are no mitigation measures under this alternative that would avoid the physical use of a Section 4(f) resource.
- Alternative 3 would result in substantial differences in costs as compared to the single replacement terminal alternatives. As described in the 2017 Exhibit K Overview the renovation of the existing terminals with one new central processor for Terminals A and B would cost approximately $1.046 billion dollars as compared to approximately $964 million dollars for the Proposed Action.[5] The renovated terminal complex would still not provide the same passenger level of service as a new terminal.

Alternative 4: New Replacement Terminal at Site A (Proposed Action)

Description: Alternative 4 provides for the replacement of the three existing terminals into one new replacement terminal at Site A. This site is located in the central terminal area at the location of the existing Terminal A site. Currently Terminal A is not being used for aircraft operations or for passenger operations. This alternative would include the demolition of Terminal A. This alternative allows for the continuation of airport operations at Terminals B and C while the replacement terminal is being built. Terminals B and C would be demolished after operations were transferred to the replacement terminal. Additionally, the three secondary circulation access roads, providing access to the three terminals, would be demolished. This change would result in the circulation access roads no longer displaying the pattern of interlocking rings characteristic of the original layout and thus would potentially no longer function as a contributing resource to the Historic District. The circulation access roads are a contributing resource to the Historic District but not individually eligible for listing on the NRHP.

Least Overall Harm Evaluation:

- Alternative 4 best meets the need of the project by providing an increase in the passenger level of service while maintaining airside and landside operations. In addition, Alternative 4 would provide for security requirements and reduce operational costs by avoiding duplication of terminal systems.
- Alternative 4 would result in a physical use of a Section 4(f) resource with the eventual demolition of all three existing terminals. After operations are transferred to the new replacement terminal, Terminal B and C would eventually have to be demolished. Terminal B must be demolished because it would conflict with the new terminal footprint and the apron space needed for operations of the new replacement terminal. Terminal C would have to be demolished because it could not be reused for other airport services or repurposed for other non-aeronautical uses. A continual mothballing of the terminal that would not be used for aeronautical purposes and generating revenue would not be economically feasible for KCAD. The terminal is located on the apron which as significant federal investment, and in an area designated for aeronautical land

[5] See discussion of Major Renovation Alternative B (MR B) and Exhibit 16 Conceptual Cost Estimates for Major Facility Components available online at http://www.flykci.com/newsroom/terminal-master-plan/

use with excellent access to the airfield. However, there is no entity such as a fixed based operator, cargo operator, or general aviation company that could use the terminal for any other aeronautical use as it stands today, without extensive renovation. This renovation likely would constitute an adverse impact under Section 106 and a physical use to a Section 4(f) resource the same as if it were demolished. Due to the location of the terminal next to an active airfield, the terminal could not be repurposed for non-aeronautical use due to safety, security, and other non-compatible land use concerns. Re-use of the terminal building for a non-aeronautical purpose would require FAA approval. Because of the location and access to the airfield for possible future aeronautical uses and prior federal investment, it is not likely that the FAA would provide the necessary approval.

- Other than the demolition of Terminals A, B, and C, and alterations to the circulation access roads there would be no other impacts to resources contributing to the historic district.
- There are no mitigation measures under this alternative that would avoid the physical use of a Section 4(f) resource.
- Based on KCAD's specific goals, airline recommendations, FAA operational requirements, and criteria including affordability, airside, terminal, and landside characteristics, ability to meet security needs, support facilities, availability of utilities, environmental impacts, implementation, and other strategic considerations, KCAD has selected Alternative 4 as the alternative that best meets the purpose and need as compared to all other alternatives.

Alternative 5: New Replacement Terminal at Site C/D

Description: Alternative 5 provides for the replacement of the three existing terminals into one new replacement terminal at Site C/D. This site is located in the central terminal area at the location of the existing Terminal C site and the undeveloped Terminal D location. This alternative would include the demolition of Terminal C. This alternative allows for the continuation of airport operations at Terminals A and B while the replacement terminal is being built. Terminals A and B would be demolished after operations were transferred to the replacement terminal. Additionally, the three secondary circulation access roads, providing access to the three terminals, would be demolished. This change would result in the circulation access roads no longer displaying the pattern of interlocking rings characteristic of the original layout and thus would potentially no longer function as a contributing resource to the Historic District. The circulation access roads are a contributing resource to the Historic District but not individually eligible for listing on the NRHP.

Least Overall Harm Evaluation:

- Alternative 5 would meet the need of the project by providing an increase in the passenger level of service while maintaining airside and landside operations. In addition, Alternative 5 would provide for security requirements and reduce operational costs by avoiding duplication of terminal systems.

- Alternative 5 would result in a physical use of a Section 4(f) resource with the eventual demolition of all three existing terminals. After operations are transferred to the new replacement terminal, Terminal A and B would eventually have to be demolished. Terminal B must be demolished because it would conflict with the new terminal footprint and the apron space needed for operations of the new replacement terminal. Terminal A would have to be demolished because it could not be reused for other airport services or repurposed for other non-aeronautical uses. A continual mothballing of the terminal that would not be used for aeronautical purposes and generating revenue would not be economically feasible for KCAD. The terminal is located on the apron which as significant federal investment, and in an area designated for aeronautical land use with excellent access to the airfield. However, there is no entity such as a fixed based operator, cargo operator, or general aviation company that could use the terminal for any other aeronautical use as it stands today, without extensive renovation. This renovation likely would constitute an adverse impact under Section 106 and a physical use to a Section 4(f) resource the same as if it were demolished. Due to the location of the terminal next to an active airfield, the terminal could not be repurposed for non-aeronautical use due to safety, security, and other non-compatible land use concerns. Re-use of the terminal building for a non-aeronautical purpose would require FAA approval. Because of the location and access to the airfield for possible future aeronautical uses and prior federal investment, it is not likely that the FAA would provide the necessary approval.

- Other than the demolition of Terminals A, B, and C, and alterations to the circulation access roads there would be no other impacts to resources contributing to the historic district.

- There are no mitigation measures under this alternative that would avoid the physical use of a Section 4(f) resource.

- No specific cost estimate was prepared for Alternative 5. It can be assumed that the cost to construct the replacement terminal structure would be similar to Alternative 4 since the structure would be the same for both alternatives. However, Alternative 5 would result in substantial differences in costs as compared to Alternative 4 because development at Site C/D would require the construction of temporary Federal Inspection Services in either Terminal A or Terminal B adding additional expense and operational inefficiencies. All operations would have to be transferred to Terminal A during construction and then transferred back resulting in additional costs as compared to Alternative 4. Due to the topography at Site C/D, extensive fill would be needed for this alternative in order to maintain appropriate grades at the apron and terminal. This would result in additional construction costs as compared to Alternative 4. In addition, Alternative 5 would result in additional costs as compared to Alternative 4 because of the potential increase in operational and fuel costs resulting from aircraft having to taxi a farther distance to the longest and most heavily used runway, 1L/19R, and to the Airport's supporting facilities. Alternative 5 could limit any potential future expansion of the current Consolidated Rental Car facilities which may impact future economic opportunities.

- For these reasons, there would be substantial differences in costs among these alternatives. Alternative 5 would result in substantially greater costs than Alternative 4.

Alternative 6: New Replacement Terminal at South Site

Description: Alternative 6 provides for the replacement of the three existing terminals into one new replacement terminal at a greenfield site located south of the existing terminal complex. This alternative allows for the continuation of airport operations at Terminals B and C while the replacement terminal is being built. Terminals A, B, and C would be demolished after operations were transferred to the replacement terminal. The function of the primary circulation access road would be altered so that it's only purpose will be to serve the Control Tower and associated facilities. It will no longer contribute to providing access to the terminals as it was originally designed to do. Additionally, the three secondary circulation access roads, providing access to the three terminals, would be demolished. This change would result in the circulation access roads no longer displaying the pattern of interlocking rings characteristic of the original layout and thus would potentially no longer function as a contributing resource to the Historic District. The circulation access roads are a contributing resource to the Historic District but not individually eligible for listing on the NRHP.

Least Overall Harm Evaluation:

- Alternative 6 would meet the need of the project by providing an increase in the passenger level of service while maintaining airside and landside operations. In addition, Alternative 6 would provide for security requirements and reduce operational costs by avoiding duplication of terminal systems.

- Alternative 6 would result in a physical use of a Section 4(f) resource with the eventual demolition of all three existing terminals. After operations are transferred to the new replacement terminal, Terminal A, B, and C would eventually have to be demolished. All three terminals would have to be demolished because they could not be reused for other airport services or repurposed for other non-aeronautical uses. A continual mothballing of all the terminals that would not be used for aeronautical purposes and generating revenue would not be economically feasible for KCAD. The terminals are located on the apron which as significant federal investment, and in areas designated for aeronautical land use with excellent access to the airfield. However, there is no entity such as a fixed based operator, cargo operator, or general aviation company that could use the terminal for any other aeronautical use as it stands today, without extensive renovation. This renovation likely would constitute an adverse impact under Section 106 and a physical use to a Section 4(f) resource the same as if it were demolished. Due to the location of the terminal next to an active airfield, the terminal could not be repurposed for non-aeronautical use due to safety, security, and other non-compatible land use concerns. Re-use of the terminal building for a non-aeronautical purpose would require FAA approval. Because of the location and access to the airfield for possible future aeronautical uses and prior federal investment, it is not likely that the FAA would provide the necessary approval.

- Other than the demolition of Terminals A, B, and C, alteration of the function of the primary circulation access road and demolition of the secondary circulation access roads, there would be no other impacts to resources contributing to the historic district.

- There are no mitigation measures under this alternative that would avoid the physical use of a Section 4(f) resource.

- Alternative 6 would result in substantial differences in costs as compared to Alternative 4 and Alternative 5. As a greenfield terminal building location, the South Site alternative would require significant improvements, including: new utility feeds; additional infrastructure like water, natural gas, and sewer lines; and airside expansion including new parallel taxiways to Runway 9/27. In addition, there would be destruction of natural resources including wetlands, streams, and potential wildlife habitat. This alternative could also lead to possible adverse effects to other historic sites and cemeteries, which in turn could require a physical and/or constructive use of other Section 4(f) resources. Building on a greenfield site would also result in increased costs due to potential environmental mitigation requirements and potential reconstruction/modifications to I-29 Interchange, I-435 Interchange, and upgrades to State Route 152. These infrastructure improvements would add significantly to the capital cost of this alternative as compared to Alternative 4 or Alternative 5. The Terminal Area Master Plan provided initial estimates of $1.71 billion dollars with of $500 million of that total for roadway improvements.[6]

G.7 Least Overall Harm Summary

As shown in **Table G-1,** Alternative 4: New Replacement Terminal at Site A (Proposed Action) has been identified as the alternative that best meets the purpose and need for the project, results in the best alternative from a constructability and economic standpoint, and that causes the least overall harm.

[6] Terminal Area Master Plan Advanced Terminal Planning Study, page 5-316, April 2015.

Table G-1 Least Overall Harm Analysis Summary

Criteria	Alternative				
	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Alternative 6
Meets the purpose and need for the project	No	No	Yes	Yes	Yes
Ability to mitigate adverse impacts to each Section 4(f) property	No	No	No	No	No
Relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection	Demolition of one terminal and extensive renovations to other two terminals likely resulting in physical use	Demolition of one terminal and extensive renovations to other two terminals likely resulting in physical use	Demolition of all three terminals and the circulation access roads	Demolition of all three terminals and the circulation access roads	Demolition of all three terminals, alteration of the function of the primary circulation road and demolition of the secondary circulation roads
Relative significance of each Section 4(f) property	Equal	Equal	Equal	Equal	Equal
Views of the official(s) with jurisdiction over each Section 4(f) property	Equal	Equal	Equal	Equal	Equal
After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f);	No adverse impact if mitigation implemented	No adverse impact if mitigation implemented	No adverse impact if mitigation implemented	No adverse impact if mitigation implemented	No adverse impact if mitigation implemented, would require more mitigation measures than the other alternatives
Substantial differences in costs among the alternatives.	$1.191 Billion	$1.046 Billion	$964 million	$964 million plus additional construction and operational costs	$1.71 Billion
Alternative with the least overall harm	No	No	Yes	No	No

G.8 Mitigation

After thorough review of the identified alternatives, it was determined that there would be no feasible and prudent alternative that would meet the purpose and need of the project and avoid the use and impact of the terminals and the potential KCI historic district, a Section 4(f) resource. If the Section 4(f) evaluation concludes there are no feasible and prudent alternatives to the use of Section 4(f) resource, it must also document that the project includes all possible planning to minimize harm or mitigate the Section 4(f) resource. As defined in 23 CFR § 774.17, all possible planning means that all reasonable measures to minimize harm or mitigate adverse impacts must be included in the project.

The FAA consulted with KCAD, the SHPO, the Kaw Nation, the Osage Nation, the Pawnee Nation, and the Ponca Tribe of Oklahoma to develop a Programmatic Agreement under Section 106 of the National Historic Preservation Act (Section 106). The Programmatic Agreement outlines the measures needed to mitigate the adverse effect to the historic district due to the Proposed Action. The mitigation measures (stipulations) of the Programmatic Agreement are a requirement of the Proposed Action.

The mitigation measures (stipulations) in the Programmatic Agreement include:

1. Construction Monitoring: KCAD will have a professional archaeologist who meets the Secretary of Interior's Professional Qualification Standards present to conduct construction monitoring during certain ground disturbing activities associated with the Proposed Action. Monitoring is defined as active observation of earth-moving or other work that could adversely affect unknown cultural resources within the Direct APE.

2. Unanticipated Discoveries of Cultural Resources and Artifacts: In the event that previously unreported and unanticipated cultural resource sites or artifacts are encountered during construction of the Proposed Action, KCAD will ensure that the Proposed Action is in compliance with all applicable Federal and state laws and regulations, including Section 106 of the NHPA.

3. Inadvertent Discoveries of Human Remains, Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony: In the event of an inadvertent discovery of human remains during construction of the Proposed Action, KCAD will ensure that the Proposed Action is in compliance with all applicable Federal and state laws and in consultation with Native American tribes.

4. Photographic Record of Terminal A: Prior to the demolition of Terminal A, KCAD will create a photographic record of Terminal A in accordance with the National Register Photo Policy Standards. The views of the photographs would include general environment, front facade, front and rear perspective views, typical windows, and exterior and interior views. The photographs would provide a permanent record of Terminal A.

5. Additional Mitigation Measures: In recognition of the loss of integrity that would render the historic district ineligible for the NRHP as a consequence of the demolition of the terminal complex, additional mitigation measures will be developed to fully resolve the adverse effects of the Proposed Action. Once selected, the mitigation measures must be complete before the City may implement the remainder of the Proposed Action, specifically the demolition of Terminal B and Terminal C (anticipated by 2022).

G.9 Coordination with the Public and with Agencies with Jurisdiction over the Section 4(f) Resource

As a part of the Section 4(f) requirements, the FAA is responsible for soliciting and considering the comments of the Department of Interior and, where appropriate, U.S. Department of Agriculture (USDA), or Housing and Urban Development (HUD), as well as the appropriate official(s) with jurisdiction over the Section 4(f) property. The Proposed Action does not include the use of a national forest or land holding under the jurisdiction of the U.S. Forest Service of the USDA, therefore, the USDA does not have jurisdiction of the identified Section 4(f) resource. In addition, because the Section 4(f) resource are Terminals owned and operated by the City, HUD should have no interest in this Section 4(f) resource.

Because the properties that would be used under Section 4(f) are historic properties, the FAA conducted consultation in accordance with Section 106 of the National Historic Preservation Action (NHPA) with the SHPO, ACHP, the Kaw Nation, the Osage Nation, the Pawnee Nation, and the Ponca Tribe of Oklahoma regarding this project. Appendix C of the EA provides a summary of the coordination.

In addition, KCAD and the FAA completed several governmental agency and public scoping activities. Key governmental agencies were invited to attend an Agency Scoping Meeting in Kansas City and to provide any information they wished to be considered in the EA, Section 106 evaluation, and 4(f) evaluation. KCAD conducted the Agency Scoping Meeting at 2:00 p.m. on March 15, 2018, at the Ambassador building 12200 N Ambassador Drive, Kansas City, Missouri. At this meeting, KCAD made a presentation about the Proposed Action and the preliminary scope of environmental analysis to be included in the analysis. Members of the KCAD, FAA, and the EA consultant team were available to respond to questions and discuss issues.

In addition to the Agency Scoping Meeting, a Public Scoping Meeting was held at 6:00 p.m. on March 15, 2018, at the Ambassador building 12200 N. Ambassador Drive, Kansas City, Missouri. The public scoping meeting was conducted in an open house format designed to inform the public about the Proposed Action and NEPA process, and allow the public to speak with KCAD and FAA representatives. The public was notified of the public scoping meeting at least 30 days before the scheduled public meeting date in the February 14, 2018 edition of the Kansas City Star newspaper. Both a legal ad and display ad were published. In addition, the public was also notified of the public scoping meeting online at http://www.kci-edgemoor.com. Anyone who had signed up to receive notification through this website was also sent an email notification.

The following are provided at the end of this appendix

- Letter to Director, Office of Environmental Policy and Compliance U.S. Department of the Interior from FAA, September 7, 2018
- Notice of Availability of Draft Section 4(f) Statement
- Missouri Federal Assistance Clearinghouse letter dated September 25, 2018
- U.S. Department of the Interior letter dated October 15, 2018

G.10 Availability of the Draft Section 4(f) Statement

A Notice of Availability (NOA) announcing the availability of the Draft Section 4(f) Statement was published on September 10, 2018 in the Kansas City Star. The legal affidavit is provided at the end of this appendix and in Appendix A. The Draft Section 4(f) Statement was available to the public online at http://FLYKCI.com and at http://www.kci-edgemoor.com. In addition, a paper copy of the Draft Section 4(f) Statement was available for public review at the same locations as the Draft EA during normal business hours. The locations are identified in **Table G-2**.

Table G-2 Locations for Review of the Draft Section 4(f) Statement

Draft EA Libraries	
Mid-Continent Library Boardwalk Branch 8656 N. Ambassador Drive Kansas City, MO 64154	Mid-Continent Library Parkville Branch 8815 Tom Watson Parkway Parkville, MO 64152
Mid-Continent Library Platte City Branch 2702 Prairie View Road Platte City, MO 64079	City of Kansas City, Aviation Department 601 Brasilia Ave. Kansas City, MO 64153
Federal Aviation Administration Central Region Airports Division 901 Locust St., Room 364 Kansas City, MO 64106-2325	

The comment period for the Draft Section 4(f) Statement was open from September 10, 2018 to October 10, 2018. Two letters were received concerning the Draft Section 4(f) Statement. The first letter from the Missouri Federal Assistance Clearinghouse dated September 25, 2018 stated none of the agencies involved in the review had comments or recommendations. The second letter from the U.S. Department of Interior dated October 15, 2018 concurred with FAA determination. Both of these letters are found at the end of this appendix. No public comments were received regarding the Draft Section 4(f) Statement.

G.11 Section 4(f) Statement Conclusion

There are no alternatives that address the purpose and need of the project and are both prudent and feasible. The FAA has consulted with KCAD, the SHPO, the Kaw Nation, the Osage Nation, the Pawnee Nation, and the Ponca Tribe of Oklahoma under Section 106 to develop a Programmatic Agreement (PA). The PA outlines the mitigation measures needed to resolve adverse effects of the Proposed Action on the National Register-eligible Kansas City International Airport Historic District. The mitigation measures are a requirement of the Proposed Action and would address the Section 4(f) requirement that the project include all possible planning to minimize harm when there is a use of a Section 4(f) resource. The FAA has determined, and the U.S. Department of Interior (DOI) concurs, that there is not a feasible and prudent alternative to this use of 4(f) resource, and the Proposed Action includes all possible planning to minimize harm to the 4(f) resource resulting from the use. The DOI determined that if an agreement under Section 106 with the SHPO and tribes is fully executed, it will have no objection to the 4(f) evaluation and concur with the measures to minimize and mitigate the use of the 4(f) resource.

U.S. Department
of Transportation

**Federal Aviation
Administration**

Central Region
Iowa, Kansas,
Missouri, Nebraska

901 Locust
Kansas City, Missouri 64106
(816) 329-2600

September 7, 2018

CERTIFIED MAIL

Director, Office of Environmental Policy and Compliance
U.S. Department of the Interior
1849 C Street, NW (MS 2462-MIB)
Washington, DC 20240

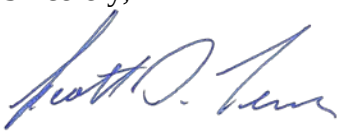
**Notice of Availability for the Draft Section 4(f) Statement for
Proposed Replacement Terminal Project
Kansas City International Airport
Kansas City, Platte County, Missouri**

A Draft Section 4(f) Statement for the Proposed Replacement Terminal Project at the Kansas City International Airport has been prepared. The City of Kansas City, Missouri proposes the development of a replacement passenger terminal and other associated projects. The proposed action includes an adverse effect on the existing terminals which are eligible for listing on the National Register of Historic Properties. This adverse effect results in a physical use under Section 4(f) of the Department of Transportation Act of 1966. The adverse effect is being mitigated through an Agreement per Section 106 of the National Historic Preservation Act (NHPA) between the Federal Aviation Administration (FAA), the Missouri State Historic Preservation Office, and the Kansas City Aviation Department.

The Draft Section 4(f) Statement is available for public review online at **http://FLYKCI.com** and at **http://www.kci-edgemoor.com**. For additional information, the Draft Environmental Assessment is also available on both of these sites.

We request that you provide any comments by October 10, 2018. If you have any questions, please contact me at scott.tener@faa.gov or (816) 329-2639.

Sincerely,



Scott Tener, P.E.
Environmental Specialist

THE KANSAS CITY STAR.
MEDIA COMPANY
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Attention:

LANDRUM & BROWN
11279 CORNELL PARK DRIVE
CINCINNATI, OH 45242

NOTICE OF AVAILABLITY OF DRAFT SECTION 4(f) STATEMENTFOR THE KANSAS CITY INTERNATIONAL AIRPORT TERMINAL REPLACEMENT PROJECT, KANSAS CITY, MISSOURI

The City of Kansas City, Missouri Aviation Department (KCAD) is issuing this notice to announce the availability of the Draft Section 4(f)Statement for the Proposed Replacement Terminal Projectat Kansas City International Airport. The City of Kansas City, Missouriand KCAD propose the development of a replacement terminal and other associated projects. The proposed action includesan adverse effect on the existing terminals, which are eligible for listing on the National Register of Historic Properties. This adverse effect results in a physical use under Section 4(f) of the Department of Transportation Act of 1966.The adverse effect is being mitigated through anAgreement per Section 106 of the National Historic Preservation Act (NHPA).

The draft document is available for public review online athttp://FLYKCI.com and at http://www.kci-edgemoor.com.The draft document is also available at the following locations during normal business hours.

- Mid-Continent Library Boardwalk Branch, 8656 N. Ambassador Drive, Kansas City, MO 64154
- Mid-Continent Library , Platte City Branch, 2702 Prairie View Road, Platte City, MO 64079
- Mid-Continent Library , Parkville Branch, 8815 Tom Watson Parkway, Parkville, MO 64152
- Federal Aviation Administration, Central Region Airports Division, 901 Locust St., Room 364, Kansas City, MO 64106-2325
- City of Kansas City, Aviation Department, 601 Brasilia Ave., Kansas City, MO 64153

The public comment period starts on September 10, 2018 and ends on October10, 2018. All comments must be accepted no later than 5:00 p.m. Central Time, Monday, October 10, 2018. Written comments may be submitted to the following address:

Chris Babb
Landrum & Brown
11279 Cornell Park Drive
Cincinnati, OH 45242
Or by email to KCIEAcomments@landrum-brown.com

For further information, contact: Mr. Scott Tener, P.E., Federal Aviation Administration, Central Region-Airports Division, ACE-600., Room 364, 901 Locust St., Kansas City, Missouri 64106-2325 Telephone: 816-329-2639.

THE STATE OF TEXAS

County of Tarrant

I, Christine Lopez,

make oath and swear that

CYPRESS MEDIA, LLC, publishers of The Kansas City Star, all it's neighborhood sections and suburban newspapers including 816, 913, Johnson County News, Northland and its subsidiaries, The Olathe News, The Cass County Democrat-Missourian and The Lee's Summit Journal, are published in the Kansas City, Missouri, metro (distribution) area including but not exclusively to Johnson and Wyandotte Counties in the state of Kansas, and Cass, Clay, Jackson and Platte Counties in the state of Missouri. Every publication listed is published weekly, twice weekly or daily. We confirm the notice ran the days scheduled in this statement. A true copy of which is hereto attached was duly published in The Kansas City Star.

FOR THE PERIOD OF: **1 day(s)**

COMMENCING: **09/10/2018**

ENDING: **09/10/2018**

EDITION(S):

09/10/2018

DEBORAH JEAN BAYLOR
Notary Public, State of Texas
Comm. Expires 10-29-2019
Notary ID 13042344-2

Subscribed and sworn to before me, this 10th day of September in the year of 2018.

My commission expires

Deborah Baylor

Deborah Baylor - Notary

Michael L. Parson
Governor

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

Sarah Steelman
Commissioner

September 25, 2018

CHRIS BABB
11279 CORNELL PARK DRIVE
CINCINNATI, OH 45242

Subject SAI: 1904005
Legal Name: LANDRUM & BROWN, INC
Project Description: NOTICE OF AVAILABILITY FOR THE DRAFT SECTION 4(F) STATEMENT FOR THE PROPOSED REPLACEMENT TERMINAL PROJECT AT THE KANSAS CITY INTERNATIONAL AIRPORT, KANSAS CITY, MISSOURI

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

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

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

Sincerely,

Sara VanderFeltz

Sara VanderFeltz
Administrative Assistant

cc:

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Denver Federal Center, Building 67, Room 118
Post Office Box 25007 (D-108)
Denver, Colorado 80225-0007

October 15, 2018

ER 18/0429

Mr. Scott Tener, P.E.
Federal Aviation Administration
Central Region Airports Division
901 Locust St., Room 364
Kansas City, MO 64106-2325

Dear Mr. Tener:

The Department of the Interior (Department) has reviewed the Section 4(f) Evaluation for the replacement terminal project at the Kansas City International Airport (KCI) ("project"). The Federal Aviation Administration (FAA) proposes to demolish Terminal A, construct a new replacement terminal on the existing site, update utilities, construct new parking facilities, modify internal roadways, rehabilitate taxiways, and demolish existing Terminals B and C after the new terminal is in operation. The Department offers the following comments and recommendations for your consideration:

Section 4(f) Comments

The document considers effects under Section 4(f) of the Department of Transportation Act of 1966 (codified at 49 U.S.C. 303) associated with the project. The FAA has determined and the State of Missouri Department of Natural Resources State Historic Preservation Office (SHPO) has concurred that Terminals A, B, and C are eligible for inclusion in the National Register of Historic Places (NRHP) and therefore would be considered Section 4(f) resources.

The Proposed Action would result in a 4(f) use of the terminals, demolition (permanent incorporation. The FAA determined that other alternatives that would avoid the physical use of the Section 4(f) resources would not meet the project purpose and need. Other alternatives would not be economically feasible. Therefore, FAA concluded that there are no feasible and prudent alternatives that completely avoid the Section 4(f) resource.

Currently, the FAA is consulting with the City of Kansas City, Missouri, Aviation Department (KCAD), the State Historic Preservation Office (SHPO), the Osage Nation, the Pawnee Nation, the Kaw Nation, and other potential consulting parties to develop an agreement under Section 106 of the National Historic Preservation Act (Section 106), which outlines the methods by which Terminals A, B, and C may be demolished. Proposed mitigation measures in the

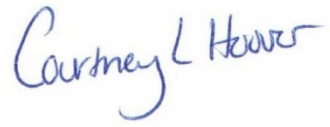
agreement include preparing a photographic record and historical report of the Section 4(f) resource. KCAD will coordinate an unanticipated discovery plan with SHPO, the Osage Nation, the Pawnee Nation, and the Kaw Nation to assist with any inadvertent archeological or cultural resource discovery that may occur during routine subsurface disturbances of the Proposed Action.

The Department's review concurs with the determination that there is not a feasible and prudent alternative to this use of 4(f) resources, and the proposed action includes all possible planning to minimize harm to the archeological resource resulting from the use. The Department determines that if the Memorandum of Agreement with the SHPO and tribes is fully executed, it will have no objection to the 4(f) evaluation and concur with the measures to minimize and mitigate the use of the archeological site.

The Department has a continuing interest in working with the project sponsors to ensure impacts to resources of concern are adequately addressed. For issues concerning Section 4(f) resources, please contact Tokey Boswell, Chief, Planning and Compliance Division, Midwest Regional Office, National Park Service, 601 Riverfront Drive, Omaha, Nebraska 68102, or by telephone at 402-661-1534.

We appreciate the opportunity to provide these comments.

Sincerely,



Courtney Hoover
Regional Environmental Officer
Office of Environmental Policy and Compliance

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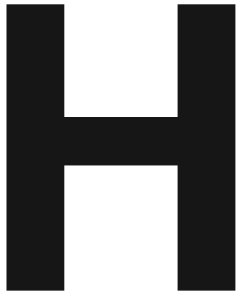
Kansas City International Airport
Environmental Assessment, Section 106 Evaluation, and
Section 4(f) Statement

Appendix H



Appendix H Responses to Comments

This appendix contains the following:

1) **Agency Comments Received**

- Missouri Federal Assistance Clearinghouse letter dated September 11, 2018
- Missouri Federal Assistance Clearinghouse letter dated September 25, 2018
- SHPO letter dated October 1, 2018
- EPA letter dated October 2, 2018
- U.S. Department of the Interior letter dated October 15, 2018

2) **Public Comments Received**

- Cumulative Environmental Effects, Or the Tyranny of Small Decisions/ Watkins Foundation/ August 29, 2018
- Writing African Americans Out of History, Or the Computer Made Us Do It/ Watkins Foundation/ August 29, 2018
- Section 106 Compliance: Disappearing Archaeology and Airport Conflict of Interest/ Watkins Foundation/ September 3, 2018
- Comment letter to Dr. Prawl, Missouri State Historic Preservation Office, December 12, 2016 and Email to Katherine Andrus, FAA, SHPO Correspondence re KCI Section 106, From Mark Raab, September 7, 2018
- Decades of Disappearing Archaeology: KCIA Conflicts of Interests/ Watkins Foundation/ September 8, 2018
- Fix the Problem: KCIA's On-Going Section 106 Compliance Failures/ Watkins Foundation/ September 13, 2018
- Email from Charles Cammack, Subject: Environmental Assessment at KCI for Single Terminal, September 14, 2018
- Email from Mark Raab, September 19, 2018
- Email from Mark Raab, September 19, 2018
- Dismantling the Miller Farm: What About the Descendants?/ Watkins Foundation/ September 21, 2018
- Email from Mark Raab, September 24, 2018
- Email from Charles Cammack, September 25, 2018
- Comment Form from Jon Woodward, September 24, 2018
- Comment Form from Alicia Stephens, September 24, 2018
- KCI Writes African Americans Out of History/ Warren Watkins Jr./ September 24, 2018
- Anticipatory Demolition: Unresolved Section 106 Compliance Problems/ Watkins Foundation/ September 29, 2018
- Letter from Ann Raab, September 27, 2018
- Public Hearing Comment from Transcript/Shirley Kimsey
- Public Hearing Comment from Transcript/Olin Miller
- Public Hearing Comment from Transcript/Cora Douglas Thompson
- Public Hearing Comment from Transcript/Frank Offut
- Public Hearing Comment from Transcript/ Warren Watkins Jr.
- KCI Traditional Cultural Property/ Watkins Foundation/ September 29, 2018

- Environmental Assessment Lacks FAA-Required Historic Preservation Plan/ Watkins Foundation/ October 1, 2018
- Email from Ann Raab, October 1, 2018
- Letter from Thomas Levin, October 1, 2018
- UPS package from Warren Watkins, October 3, 2018
- Email from Lisa Piazza, October 10, 2018

3) Responses to Comments (Provided in Table H-1)

Michael L. Parson
Governor

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

Sarah Steelman
Commissioner

September 11, 2018

CHRISTINA BABB
11279 CORNELL PARK DRIVE
CINCINNATI, OH 45242

Subject SAI: 1902054
Legal Name: LANDRUM & BROWN, INCORPORATED
Project Description: NOTICE OF AVAILABILITY AND NOTICE OF PUBLIC HEARING FOR THE DRAFT ENVIRONMENTAL ASSESSMENT AND SECTION 106 REVIEW FOR THE PROPOSED REPLACEMENT TERMINAL PROJECT AT THE KANSAS CITY INTERNATIONAL AIRPORT, KC MO

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

None of the agencies involved in the review had comments or recommendations to offer at this time. This concludes the Clearinghouse's review.] A01

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

Sincerely,

Sara VanderFeltz
Administrative Assistant

cc:

Michael L. Parson
Governor

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

Sarah Steelman
Commissioner

September 25, 2018

CHRIS BABB
11279 CORNELL PARK DRIVE
CINCINNATI, OH 45242

Subject SAI: 1904005
Legal Name: LANDRUM & BROWN, INC
Project Description: NOTICE OF AVAILABILITY FOR THE DRAFT SECTION 4(F) STATEMENT FOR THE PROPOSED REPLACEMENT TERMINAL PROJECT AT THE KANSAS CITY INTERNATIONAL AIRPORT, KANSAS CITY, MISSOURI

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

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

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

Sincerely,

Sara VanderFeltz

Sara VanderFeltz
Administrative Assistant

cc:

Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Michael L. Parson, Governor
Carol S. Comer, Director

October 1, 2018

Landrum & Brown
Attn: Mr. Chris Babb
11279 Cornell Park Drive
Cincinnati, OH 45242

Re: **SHPO Project Number 007-PL-13** – Environmental Assessment and Section 106 Evaluation for the Replacement Terminal at the Kansas City International Airport, Platte County, MO (FAA)

Dear Mr. Babb:

Thank you for submitting information about the above-referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.L. 89-665, as amended) and the Advisory Council on Historic Preservation's (ACHP) regulation 36 CFR Part 800, which require identification and evaluation of cultural resources.

We have reviewed the report entitled *Environmental Assessment and Section 106 Evaluation for the Replacement Terminal at the Kansas City International Airport*. Based on this evaluation we have the following comments for your consideration as you move forward to finalize the Environmental Assessment (EA):

- The term historic property is a legally defined term that should be defined in the document and used throughout to identify resources as needed. In addition, the terms building, structure, object, site, and district should be used as defined by the National Park Service in relation to eligibility and nomination of properties to the National Register of Historic Places (NRHP). A03
- The document references a Memorandum of Agreement (MOA) that is being developed between consulting parties to resolve adverse effects associated with the demolition of buildings. The report should be updated to include information on the Programmatic Agreement (PA) currently being developed and the suggested mitigation stipulations listed in section 3.10.2.2 should be updated to match those in the PA. In addition, all consulting parties to the development of the agreement document should be listed in the EA. As the type of agreement document required for resolving adverse effects has changed, our office recommends that the FAA reach out to the ACHP to notify them of the change and invite them to participate in the consultation process. A04

Recycled paper

- Section 3.8.1 introduces the airport as a historic property and Section 3.10.1.3 identifies that it is less than fifty years old, but does not go on to discuss how Criterion G is applicable in this case. A05
- Exhibit 3-3 is a map entitled "Structures in the Direct APE" and includes a table with the dates the buildings were constructed, but no rationale for its inclusion was in the text. Please explain its relevance and how it relates to the airport historic district. A06
- Section 3.10.2.2 Direct Impact section states, "There would be no direct impacts to any other structures eligible or potentially eligible to the National Register of Historic Places. The Parking garages would not be considered eligible and contribute nothing to the historic nature of the terminal buildings." This needs to be edited to reflect the fact that the airport is a historic district with applicable areas and periods of significance and contributing and non-contributing resources. A07
- Section 3.10.2.2 for Direct Impact does not reference the continued consultation that will result in monitoring and continued investigation into the possibility of buried resources. A08
- Section 3.10.2.2 for Traditional Cultural Properties (TCP) makes statements that imply that if the airport were determined to be a TCP, the airport would have do research and prepare a nomination for the property to the NRHP; however, this is not the case and the section should be reworded. A09
- Table 3-7 "Past, Present, and Foreseeable Future Actions" lists expansion and renovations to the airport and Appendix F contains a map entitled "Future Airport Layout Plan." In order for our office to assess effects of the foreseeable actions and cumulative effects please provide our office with the scope, plans, and locations of this future development. In addition, Table 3-7 references the Intermodal Business Center Phase II and has notations indicating SHPO consultation was completed in 2008. Should this project move forward in the future, consultation with this office will need to resume due to the length of time between review and action. A10
- Appendix C contains copies of letters from our office; however, not all pages of these communications appear in the document. Please revise the appendix to include all pages of documentation. A11

We look forward to continuing to consult with you on the effects of this project as we move through the Section 106 consultation process.

If you have any questions please write Missouri Department of Natural Resources, State Historic Preservation Office, Attn: Review and Compliance, P.O. Box 176, Jefferson City, Missouri 65102, or call Amanda Burke (573) 522-4641.

Please be sure to include the **SHPO Project Number (007-PL-13)** on all future correspondence relating to this project. If the information is provided via telephone call, please follow up in writing for our files.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Toni M. Prawl

Toni M. Prawl, Ph.D.
Director and Deputy
State Historic Preservation Officer

TMP:ab

c: Ms. Katherine Andrus, FAA
Mr. Scott Tener, FAA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

Landrum & Brown
Attn: Chris Babb
11279 Cornell Park Drive
Cincinnati, OH 45242

Dear Mr. Babb:

We received the September 10, 2018, public Notice of Availability and request for comment for the Draft Environmental Assessment and Section 106 Review for the Proposed Replacement Terminal Project at the Kansas City National Airport. Our review is provided pursuant to the National Environmental Policy Act 42 U.S.C. 4231, Council on Environmental Quality regulations 40 CFR Parts 1500-1508, and Section 309 of the Clean Air Act.

We have reviewed the Draft EA for the project and, provided the required local, state and federal regulations, permit conditions and best management practices discussed within the EA are implemented and followed, EPA believes that NEPA compliance and environmental effects are adequately considered in the document for this project. EPA supports the commitment to recycle and reuse existing materials and implement sustainable construction, building, and operational measures where reasonable and practicable.

A12

We commend your continued coordination efforts with various other local, state and federal agencies and entities throughout the development of the project and we encourage ongoing coordination as design planning and construction activities commence.

We appreciate the opportunity to review the EA and provide comments. If you have any questions on these comments, please contact Amber Tilley, of my staff, at (913) 551-7565 or tilley.amber@epa.gov.

Sincerely,

Joshua Tapp
Deputy Director
Environmental Science & Technology Division

Printed on Recycled Paper

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Denver Federal Center, Building 67, Room 118
Post Office Box 25007 (D-108)
Denver, Colorado 80225-0007

October 15, 2018

ER 18/0429

Mr. Scott Tener, P.E.
Federal Aviation Administration
Central Region Airports Division
901 Locust St., Room 364
Kansas City, MO 64106-2325

Dear Mr. Tener:

The Department of the Interior (Department) has reviewed the Section 4(f) Evaluation for the replacement terminal project at the Kansas City International Airport (KCI) ("project"). The Federal Aviation Administration (FAA) proposes to demolish Terminal A, construct a new replacement terminal on the existing site, update utilities, construct new parking facilities, modify internal roadways, rehabilitate taxiways, and demolish existing Terminals B and C after the new terminal is in operation. The Department offers the following comments and recommendations for your consideration:

Section 4(f) Comments

The document considers effects under Section 4(f) of the Department of Transportation Act of 1966 (codified at 49 U.S.C. 303) associated with the project. The FAA has determined and the State of Missouri Department of Natural Resources State Historic Preservation Office (SHPO) has concurred that Terminals A, B, and C are eligible for inclusion in the National Register of Historic Places (NRHP) and therefore would be considered Section 4(f) resources.

The Proposed Action would result in a 4(f) use of the terminals, demolition (permanent incorporation. The FAA determined that other alternatives that would avoid the physical use of the Section 4(f) resources would not meet the project purpose and need. Other alternatives would not be economically feasible. Therefore, FAA concluded that there are no feasible and prudent alternatives that completely avoid the Section 4(f) resource.

Currently, the FAA is consulting with the City of Kansas City, Missouri, Aviation Department (KCAD), the State Historic Preservation Office (SHPO), the Osage Nation, the Pawnee Nation, the Kaw Nation, and other potential consulting parties to develop an agreement under Section 106 of the National Historic Preservation Act (Section 106), which outlines the methods by which Terminals A, B, and C may be demolished. Proposed mitigation measures in the

agreement include preparing a photographic record and historical report of the Section 4(f) resource. KCAD will coordinate an unanticipated discovery plan with SHPO, the Osage Nation, the Pawnee Nation, and the Kaw Nation to assist with any inadvertent archeological or cultural resource discovery that may occur during routine subsurface disturbances of the Proposed Action.

The Department's review concurs with the determination that there is not a feasible and prudent alternative to this use of 4(f) resources, and the proposed action includes all possible planning to minimize harm to the archeological resource resulting from the use. The Department determines that if the Memorandum of Agreement with the SHPO and tribes is fully executed, it will have no objection to the 4(f) evaluation and concur with the measures to minimize and mitigate the use of the archeological site. A13

The Department has a continuing interest in working with the project sponsors to ensure impacts to resources of concern are adequately addressed. For issues concerning Section 4(f) resources, please contact Tokey Boswell, Chief, Planning and Compliance Division, Midwest Regional Office, National Park Service, 601 Riverfront Drive, Omaha, Nebraska 68102, or by telephone at 402-661-1534.

We appreciate the opportunity to provide these comments.

Sincerely,

Courtney L Hoover

Courtney Hoover
Regional Environmental Officer
Office of Environmental Policy and Compliance

Cumulative Environmental Effects, Or the Tyranny of Small Decisions

Comments on *Environmental Assessment and Section 106 Evaluation, Replacement Terminal, Kansas City International Airport, Draft-August 2018.*

by:
The Watkins Foundation,
Kansas City, Missouri

29 August 2018

Summary of Comments:

Kansas City International Airport (KCIA) has issued a draft Environmental Assessment (EA) which can be seen here: https://www.kci-edgemoor.com/documents/

Comments below address the cumulative effects (CE) analysis of the draft EA referenced above. KCIA is contemplating a major new airport, which would accelerate environmental effects already spanning generations and reaching far beyond the airport terminal itself. The crux of these effects is development of the airport's 11,000+ acres (ca. 53 square-miles). The draft EA raises significant questions about whether the airport is properly complying with FAA and other Federal environmental guidance in how it manages this land development. Our comments are aimed at improving the EA in the ways:] P01

- The draft EA's discussion of cumulative environmental effects (pages 88-89) is a materially inaccurate representation of the airport's Federal environmental protection responsibilities.] P02
- Inaccurate statements in the draft EA pose questions about proper conveyance of airport land to private developers. The EA should not be approved until these questions are resolved.] P03
- The final EA should document cumulative environmental effects of past, present and foreseeable airport land development, effects which are likely to accelerate after new terminal construction.] P04

What Are Cumulative Environmental Effects Under Public Law?

Federally-funded or permitted projects may have adverse effects on the environment, including historical properties. These projects may have cumulatively greater effects than any single action. The National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) require Environmental Assessments, including the current KCIA draft EA, to consider such effects. The intent of these laws is to avoid what the famed ecologist William Odum described as, "The tyranny of small decisions." Odum refers to situations where a single environmental decision—a new airport terminal, for example-- may have a relatively small individual impact but may trigger larger long-term environmental consequences. KCIA claims that the environmental effects of new terminal construction are confined to relatively small areas

(Areas of Potential Effect) and these will have no significant cumulative environmental effects. We show below that this assertion is false, based on past, present and reasonably foreseeable ways that the airport is developing its 53-square-miles of land.

How Are Cumulative Environmental Effects Evaluated?

The National Environmental Policy Act (NEPA) defines cumulative effects as the total environmental impact of a proposed action, when this action is added to past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such other actions (40 CFR ~ 1508.7):

https://ceq.doe.gov/docs/ceq-publications/ccenepa/sec1.pdf

In an aviation-related example, cumulative environmental effects are described this way:

"... the expansion of an airport runway that will increase the number of passengers traveling must address not only the effects of the runway itself, but also the expansion of the terminal and the extension of roadways to provide access to the expanded terminal. If there are similar actions planned in the area that will also add traffic or require roadway extensions (even though they are nonfederal), they must be addressed in the same analysis." (Web source above, page 1.)

Historical resources are also subject to review for cumulative environmental effects. The National Historic Preservation Act (NHPA), through implementation of Section 106 of the Act, addresses cumulative effects in this way:

"Adverse effects include reasonably foreseeable effects by the undertaking that may occur later in time, be farther removed in distance or be cumulative." (36 Code of Federal Regulations Part 800.5(1)).

Inaccurate Statements About Cumulative Environmental Effects?

The airport's draft EA offers this statement on cumulative environmental effects related to airport land use:

"Impacts [synonymously, effects] to historic resources are generally site specific and will not combine with impacts from other projects to cause significant impacts. For present and foreseeable future actions, independent of the Proposed Action, an analysis of historic, architectural and cultural resources would be required if there is an undertaking by a federal agency. For present and foreseeable future actions that do not involve an undertaking by a federal agency such as purely private property off airport property that is not being done under the direct or indirect jurisdiction of a Federal agency or does not require federal financial assistance or a federal permit, or approval, the private developer (not the airport or the FAA) would be responsible to meet local or state requirements. Therefore, implementation of the Proposed Action, when combined with other past, present, or reasonably foreseeable future projects would not result in significant adverse effects to historic, architectural, archaeological and cultural resources." (Pages 88-89, draft EA, August 2018)

This statement's convoluted and ambiguous phrasing is difficult to decipher. However, it seems to assert that development projects on airport property fall into two categories. One

P05

category includes projects subject to Federal environmental laws because they are undertaken by a Federal agency, require a Federal permit or funding or are otherwise under "direct" Federal jurisdiction. The second category includes projects involving "purely private property off airport property," obligated only to local and state environmental regulations. This distinction poses an important question: Is there a category of "purely private" development of airport property exempt from Federal environmental laws in the manner implied in the draft EA? We posed this question to Ms. Katherine Andrus, environmental compliance specialist for the FAA, Washington, District of Columbia. Ms. Andrus provided the following thoughtful response, received July 23, 2018:

P05

"Thank you for your inquiry. Generally speaking, the FAA does not regulate airports other than for safety. However, obligated airports (i.e., those that accept FAA funding) are bound by contract with the FAA to operate their airports according to certain FAA guidelines and grant assurances, including maintaining an FAA-approved Airport Layout Plan (ALP). A change in land use or construction of new buildings or structures on airport property requires FAA approval of an ALP amendment, whether it is done by the airport sponsor or the result of a lease and undertaken by private developers. FAA approval of the amended ALP is a Federal action triggering NEPA. If the lease does not result in a change in land use and there is no new construction, then there is no ALP change, no Federal action and thus no NEPA review. A permanent conveyance or long-term lease (more than 20 years) of land from an obligated airport is considered a "release" from federal obligations and requires a change to the ALP and FAA approval subject to NEPA review, whether or not there is a change in land use or construction. FAA's environmental review under NEPA may take the form of a categorical exclusion (CATEX), Environmental Assessment (EA) or Environmental Impact Statement (EIS). FAA Order 1050.1F (https://www.faa.gov/documentLibrary/media/Order/FAA_Order_1050_1F.pdf) lists actions that are covered by a CATEX and that typically require an EA or EIS."

This part of Ms. Andrus' correspondence seems particularly pertinent to the question of whether there is a category of "purely private" airport development not subject to Federal environmental regulations: **"A permanent conveyance or long-term lease (more than 20 years) of land from an obligated airport is considered a "release" from federal obligations and requires a change to the ALP and FAA approval subject to NEPA review."** This comment raises questions about whether the statements found on pages 88-89 of the draft EA are materially inaccurate and misleading. Based on Ms. Andrus' comments, conveyance of airport land to a private developer is generally a Federal undertaking *per se*, triggering a NEPA/Section 106 environmental study, even if the developer is not otherwise Federally obligated or receiving a Federal permit or funding. The critical environmental issue, it appears, is the act of conveying airport property to private developers, not whether such developers are receiving Federal permits or funding. If so, the notion of "purely private" development characterized in the EA is misleading at best. Ms. Andrus' clear and concise comments would be a welcome substitution for the dubious phraseology of pages 88-89 of the draft EA.

P06

A concrete example of the confusion described above is the land sale advertised here: http://www.loopnet.com/Listing/NW-Of-I-29-Mexico-City-Ave-Kansas-City-MO/8815201/

This real estate listing, active at the time of this writing, shows nearly 1,100 acres for sale in the indirect Area of Potential Effects (APE) of the airport EA. This parcel is clearly included in the KCI Area Plan, which can be seen here:
http://kcmo.gov/wp-content/uploads/sites/9/2016/03/KCIAreaPlan.pdf

Since the parcel is within the EA's indirect APE, we contacted Mr. Scott Tener, Kansas City FAA, to confirm that it is subject to NEPA/Section 106 environmental studies. We received this surprising response from Mr. Tener on July 30, 2018:

"The property in question is private property and not owned by the Kansas City International Airport. Since this property is not owned by the airport, KCAD is not under any obligation to complete NEPA or any Section 106 studies."

If this parcel is private property, why is it within the EA's indirect APE; i.e., subject to NEPA/Section 106 study by definition? When we directed this question to Mr. Tener, he amended his comments as follows (7/131/2018): P07

"You are correct that environmental and historical impacts need to be considered and evaluated for the indirect APE, whether on or off airport property. For the proposed new passenger terminal project, the indirect APE is being evaluated as part of the EA. We ask that during the public review and comment period, that you review the draft EA and provide comments as appropriate. We will respond to your comments as part of the EA public involvement process."

The land parcel in question is listed for sale by a private land broker. Is that an example of the "purely private" category of airport development described in the draft EA; i.e., excluded from compliance with FAA environmental regulations? If so, why is the land subject to NEPA/Section 106 study in the current EA? More unanswered questions: Is the sale parcel included in the Airport Layout Plan (ALP) mentioned above, and is its sale subject to an FAA-approved ALP amendment and a required NEPA/Section 106 study? This is a concrete example of the EA's confusing rationale for when the airport is required to comply with FAA environmental regulations and when it isn't. P08

The reference to "purely private development off airport property" (EA draft, page 88) creates more confusion. How is it determined when "purely private development" of airport land is "off airport property"? Is it when airport property is leased or sold to a private developer or designated for such conveyance? If so, would such a rationale violate the KCIA's contract with the FAA by allowing the land to be developed without following the FAA environmental regulations described by Ms. Andrus? These are more questions must be resolved before accepting the draft EA. P09

The draft EA's assessment of the cumulative effects of on-airport development projects is ambiguous in other ways. The airport addresses past, present and foreseeable development projects in Table 3-7, which can be seen page 87 of the draft EA. Table 3-7 only lists past projects undertaken between 2013 and 2017, of which eight (8) are listed. Four (4) projects are listed for 2018. One (1) project is listed as reasonably foreseeable. In our opinion, these data are far from adequate for assessing cumulative environmental effects. Table 3-7 does not address the number of projects before 2013, private and airport-only, although this number is likely substantial (see below) and would give a better idea of the pace of land development in the past and perhaps to project future developments. Crucially, there is no indication in this P10

discussion whether private developments on airport land, during any period, were carried out with FAA-approved ALP amendments and, following Ms. Andrus' analysis, if these projects were deemed Federal actions requiring NEPA and NHPA compliance. Moreover, for reasons that we discuss below, the claim that a single project is the only foreseeable outcome of new terminal construction over the next two decades is highly dubious. This claim implicitly defines "foreseeable" as a single project already underway at the airport; i.e., the LogisticsCentre IV Intermodal complex noted in Table 3-7. Nor does this analysis factor in minimum to maximum projected effects of the expanded aviation capacity that the new terminal will certainly cause; for example, foreseeable effects of more flights involving intermodal commerce. In our view, this narrow conception of reasonably foreseeable effects is not justified by the scanty data provided in the draft EA.

P10

P11

In summary, the draft EA's confusing and inaccurate statements prompt reasonable questions about the airport's compliance with FAA and Federal environmental regulations. For example, if "purely private" land developments have occurred which were not properly compliant with NEPA and NHPA requirements, the cumulative effects of these developments on cultural and other resources may be considerable. If a pattern of non-compliance or inconsistent compliance has occurred in the past, it's important that the current EA identify these problems and prevent their perpetuation.

We therefore request that the EA should not be accepted until the following are documented in the EA:

- A list of all land conveyances to private land developers at the airport, past or present.
- A list of FAA-approved ALP amendments related to privately-developed airport land.
- A list of private developments at the airport that required NEPA and NHPA review, referenced to resulting compliance reports.

P12

Historical and Foreseeable Patterns of Airport Land Development

We want to be clear in stating that development of airport land is beneficial. The economic benefits of such development to the airport, city and region are numerous. However, these developments must take place in manner that is appropriately responsive to Federal environmental protection regulations. We believe this responsiveness depends on recognition that the proposed airport terminal has a demonstrable potential to increase cumulative environmental effects reaching far beyond terminal construction itself, when viewed in the context of past and present airport development and the airport's announced development plans. For purposes of CE analysis, we believe the proper frame of reference is the airport's approximately 53-square-miles of land. This is shown by the following summary of airport land development, including developments by private businesses.

P13

Past Airport Development

KCIA has an active history of developing, directly or through leases or land sales to private developers, a wide range of public facilities, commercial activities, residential properties and businesses. We do not know precisely how many acres have been developed at KCIA to date, but the following list undoubtedly totals thousands of acres:

- KCPD patrol station complex
- Office buildings

- Hotels/lodgings
- Car-parking businesses
- Aviation support businesses
- Communications businesses
- Agricultural leases
- Intermodal warehouses and related businesses

As discussed earlier, we believe that informed review of the current EA should be based on a list of all airport land developments to date and how these were reviewed for compliance with Federal environmental regulations. Only with an accounting of the cumulative scale of these developments can we reasonably assess past land-use patterns.

Foreseeable Development and Cumulative Effects

The last activity on the above list is one example of how the new airport is likely to accelerate land development on airport property. Located near the epicenter of the United States and positioned to exploit Kansas City's NAFTA port-of-entry status, the airport already has a substantial regional presence in intermodal commerce (moving freight and mail to and from aircraft to surface transportation). The proposed terminal logically increases the airport's capacity for this type of rapidly increasing commercial activity. An example of how KCIA is already taking advantage of this trend can be seen in the LogisticsCentre IV complex listed in Table 3-7 of the draft EA: P14

"LogisticsCentre IV is a class A warehouse/distribution center that was developed on a speculative basis by a joint venture between Trammell Crow Company and Clarion Partners, both of which are based out of Dallas, TX. "We are pleased to welcome BMS as the latest occupant to our 687-acre master planned business park. Having a third-party logistics provider like BMS in the park will help drive other users to the project," said Jim Didion, the business unit leader for Trammell Crow Company in KC." https://www.plattecountyedc.com/2017/08/21/bms-logistics-leases-432000-sf-at-kci-intermodal-businesscentre/

Planning Documents

The proposed action is a major new airport with a current estimated construction cost of approximately 1.4 billion dollars, one of the single largest developments in Kansas City, Missouri history. The new airport is expected to significantly increase passenger and air freight traffic. It is thus reasonably foreseeable that airport expansion will stimulate more airport land development. Here, it is important to note that airport planning documents envision such future development, designating various tracts of airport land for residential, commercial, industrial and other kinds of future development. This plan can be see here: P14

http://kcmo.gov/wp-content/uploads/sites/9/2016/03/KCIAreaPlan.pdf

Cumulative Impact Not Remote, Speculative or Improbable

FAA guidance (Cumulative Impact, FAA Order 1050.1F, July 2015) defines conditions under which it is reasonable to expect a proposed action to have significant cumulative environmental effects (impacts):

"Future actions not grounded in planning documents, projected development trends, or regional or local plans would typically be considered remote and speculative, and thus need not be analyzed. In addition, future actions may be considered improbable or remote even though they have been mentioned in planning documents (e.g., general statements about future growth opportunities and unrefined lists of potential projects). Such actions should be mentioned in the NEPA document with an indication that they are not reasonably foreseeable."

We believe the posed action will have significant cumulative environmental effects, based on:

- Airport planning documents
- Scale of past and present airport land developments
- Reasonably foreseeable future effects of the new airport terminal

Airport land-use history and land-use planning are plainly a record of cumulative environmental effects, not remote, speculative or improbable.

Cumulative Effects on Historical and Archaeological Resources

The draft EA makes this statement about historical and archaeological resources:

"For present and foreseeable future actions, independent of the Proposed Action, an analysis of historic, architectural, archaeological and cultural resources would be required if there is an undertaking by a federal agency." (draft EA, page 88).

What if foreseeable future actions consist of the leases and sales of airport land to private developers discussed above? If these conveyances are Federal actions, as Ms. Andrus' analysis suggests, it seems logical that these actions are subject to compliance with the NEPA and Section 106 of the NHPA. This is an issue that requires clarification before finalizing the current EA. It's also a question that may require guidance from the Advisory Council on Historic Preservation. The Council's regulations, as noted earlier, call for assessment of potential adverse effects on historical resources, including effects that may be cumulative in nature. P15

Revise the EA to Allow Informed and Accountable CE Analysis

The draft EA's assertion that the proposed terminal will have no CE is not warranted. Based on the comments above, we believe the final EA must provide more detailed information with which to analyze cumulative environmental effects than the brief, confusing and inaccurate statements in the current EA draft. Until this document includes detailed information on the extent of private development at the airport, and evidence that this development is compliant with FAA and other Federal environmental regulations, we believe that it's not possible to make truly informed decisions about cumulative environmental effects or identify informed resource planning alternatives. P16

Writing African Americans Out of History, Or the Computer Made Us Do It

Comments on *Environmental Assessment and Section 106 Evaluation, Replacement Terminal, Kansas City International Airport, Draft-August 2018.*

by:
The Watkins Foundation,
Kansas City, Missouri

29 August 2018

Summary of Comments:

Kansas City International Airport (KCIA) has issued a draft Environmental Assessment (EA) which can be seen here: https://www.kci-edgemoor.com/documents/

KCIA is required to consider effects of a proposed new airport terminal on environmental justice (EJ) provisions of the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA), Section 106. We have reviewed the EJ component of draft EA and offer the following comments:

- At a scoping meeting for the airport EA, the Watkins Foundation of Kansas City, Missouri clearly documented the unique importance of recorded airport archaeological sites to African American and U.S. history and requested to be consulted in determining management alternatives for these sites (Appendix 1).

- The airport's response to the Foundation's consultation request was categorical exclusion of African Americans and other minorities from EJ consideration, based on inexplicable use of aviation software designed to model environmental effects of jet noise and other aircraft performance factors. P17

- Past legal action involving airport historical resources poses a significant question about whether the airport has a conflict of interest in assessing EJ issues. P18

- The draft EA should be amended to identify archaeological resource management alternatives, based on consultation with the African American EJ stakeholders. P19

What Is Environmental Justice Under Public Law?

Federally-funded or permitted projects may have disproportionately adverse effects on minority populations. These effects can take many forms, including threats to properties important to the cultural and historical identity of minority communities. Native Americans and other minority groups may seek protection of such properties under the rubric of Environmental Justice (EJ). The National Environmental Policy Act (NEPA) mandates that the airport's Environmental Assessment (EA) must consider the possibility of such adverse effects. The National Historic Preservation Act (NHPA), specifically studies carried out under Section 106 of the Act, works with the NEPA to identify and remedy EJ issues related to archaeological and other historical properties.

How is Environmental Justice Evaluated?

KCIA is an FAA-obligated airport. Accordingly, NEPA standards for evaluating EJ issues are addressed by FAA Order 1050.1F (Chapter 12), which can be seen here: https://www.faa.gov/documentLibrary/media/Order/FAA_Order_1050_1F.pdf .

These standards require that the present EA look at whether construction of the new airport terminal "would have the potential to lead to a disproportionately high and adverse impact" due to effects on the physical or natural environment significant to the minority population." The natural environmental component of these regulations includes archaeological and historical resources.

This NEPA requirement to consider effects on historical properties is satisfied by a Section 106 study, mandated by the National Historic Preservation Act (NHPA). The airport's Section 106 study, included in the draft EA, examines past airport archaeological studies and reports the results of archaeological testing procedures of the area of the proposed new terminal.

The Advisory Council on Historic Preservation (ACHP) is a Federal agency which arbitrates implementation of Federal historic preservation laws, including compliance with Section 106 of the National Historic Preservation Act (NHPA). The Council is clear in noting that EJ issues can be raised in how Section 106 studies contribute to compliance with the National Environmental Policy Act (NEPA):

"Environmental justice issues encompass a broad range of impacts covered by the NEPA, including impacts on the natural or physical environment and interrelated social, cultural, and economic effects. In Section 106 consultations, representatives of affected communities may also raise environmental justice issues. Such issues which can be addressed through historic preservation considerations may contribute to the agency's overall environmental justice compliance." http://ww.achp.gov/docs/NEPA_NHPA_Section_106_Handbook_Mar2013.pdf

Slave History and Environmental Justice

Following the ACHP guidance above, representatives of Kansas City's African American community have clearly, unambiguously identified themselves as EJ stakeholders. They did so at a public scoping meeting for the airport's EA, held March 15, 2018. Following this meeting, the Watkins Foundation of Kansas City, Missouri submitted written comments to KCIA which can be seen below in Appendix 1. These comments can also be seen in the draft EA, pages 182 to 188. These comments describe in detail the significant cultural and historical connections of the African American community to archaeological resources located on airport land.

The Airport's Mid-19th Century Slave-Owning Farms

Previous archaeological studies of KCIA document exceptionally preserved archaeological remains of early and mid-1800s farms (ERCM 2008, 2009). These are noted on page 51 of the EA and discussed in Appendix 1. These include:

- 23PL1507 (Miller Farm, National Register eligible)
- 23PL1504 (potentially Register eligible)
- 23PL1470 (potentially Register eligible)

As discussed In Appendix 1, members of the Kansas City African American community, and elsewhere in the United States, are directly descended from slaves living on these farms. These descendant families helped to build modern Kansas City. Among these descendants was Bruce R. Watkins, first black City Council Member and civil rights leader. His legacy can be seen today in the city's Bruce R. Watkins Cultural Center (Appendix 1).

The airport's archaeological farms are the embodiment of an extraordinary era in African American and United States history. These farms mark the expansion of slavery to the mid-19th century American frontier, and the role that slavery played in the Missouri-Kansas Border War; a war that many historians credit with igniting the American Civil War. As described in Appendix 1, KCIA slave-owning farms are directly linked to other momentous national events. A slave who ran away from farm 23PL1507, George Washington, joined other slaves to form the military unit that first engaged Confederate forces in armed combat during the American Civil War. This was the first time that ex-slaves took up arms to free themselves during the Civil War. This momentous fight for freedom is commemorated at the Island Mound Battlefield State Park in Bates County, Missouri.

In the same way that archaeological resources can embody the cultural history of Native Americans and other communities, the 19th century archaeological farms located at KCIA are true national historic treasures. These unique and nationally important archaeological resources rightly deserve environmental justice consideration under provisions of the NEPA and the NHPA. Integral to determining such protection is consulting descendant communities about appropriate resource protection measures. Until such recognition and consultation with the African community has been undertaken and documented, we believe the draft EA document is not compliant with EJ requirements of the NEPA and of the ACHP.

The Computer Made Us Do It

The draft EA advances an inexplicable argument that no minority communities exist around the airport that require EJ consideration. The claim is found on page 72 of the draft EA, quoted below in its entirety:

"The AEDT Version 2d was used to identify census block groups within the General Study Area. Then, AEDT determined which census block groups are composed of 50% or more minority populations and/or more low income populations. According to the data there were no environmental justice populations identified within the General Study Area. Further, there is nothing to indicate that there is a minority population present that is meaningfully greater than the minority population percentage in the general population of the geographic area under analysis."

Unfortunately, this cryptic statement gives the reader no meaningful understanding of how the airport analyzed its EJ obligations or the unfairly discriminatory results of this analysis. Consider the following points:

- What is AEDT? The acronym AEDT stands for Aviation Environmental Design Tool. This is a computer program that:

"models aircraft performance in space and time to estimate fuel consumption, emissions, noise, and air quality consequences. AEDT is a comprehensive tool that provides information to FAA stakeholders on each of these specific environmental impacts."

Look here for more details about AEDT: https://aedt.faa.gov/productreleases.aspx

Modeling effects of aircraft fuel consumption, emissions, noise and air quality is clearly useful for certain kinds of human environmental analysis. For example, if minority folks living near an airport runway are subjected to high levels of jet noise, this program might suggest that the airport avoid creating a hearing-impaired community. It's far from clear, however, how this program is appropriate for determining if minority communities exist all for purposes of EJ assessment. The draft EA's claim that this program can meaningfully dismiss documented cultural and historical links of a minority community to airport archaeological resources is literally incredible.

•What are the results of using AEDT? While the draft EA prose is nearly impenetrable, it argues that unless some percentage of minority people live in some sort of census blocks somewhere around the airport, there are no EJ concerns the need consideration. While this obscure reasoning will likely surprise African Americans and other minorities, imagine the reaction if this AEDT minority cloaking device were used against Native Americans.

Federal law (Section 106) requires KCIA to consult with Native American tribes about EJ issues, and the draft EA references such consultations. Tribes engaged in these discussions are located hundreds of miles from the airport. These tribes certainly do not live in census blocks around the airport. Cultural and historical links to airport archaeological resources is obviously the basis of such discussions. Not census blocks or a software algorithm mysteriously "determining" whether the airport must take notice of them.

Does this mean, then, that African Americans and other non-Native American minorities are differentially excluded by the AEDT model from EJ considerations? It appears so. This is an interesting distinction under Title VI of the Civil Rights Act of 1964. The Act defines African Americans as a protected category, which Federal agencies (including Federally-obligated airports) must take care not to discriminate against unfairly. This presumably includes using non-sensical applications of aviation software to avoid the formally stated EJ concerns of African Americans with clear historical links to documented KCIA archaeological resources. P20

Conflict of Interest?

Federal civil rights laws are not the only legal precedents that demonstrate the absurdity of excluding the African American community from EJ consultation. As discussed in Appendix 1, KCIA petitioned the Circuit Court of Platte County, Missouri a decade ago for permission to move four 19th century cemeteries located on KCIA property. African American and Euro-American descendants of persons buried in and around these cemeteries opposed this petition. Court granted standing to the descendants to oppose the petition, including a court-appointed *guardian ad litem* for the descendants. The court did this to acknowledge, in part, descendants' claims that slave burials may exist in or in proximity to the four historic cemeteries. These cemeteries were created by slave owners and slaves that occupied three airport archaeological sites included in the draft EA and shown in Appendix 1: 23PL1504, 23PL1507 and 23PL1470. The airport's petition was rejected by both trial and appellate courts (Missouri Court of Appeals, Western District, 2009). It is thus clear that African American descendants have long-standing, P21

court-recognized links to archaeological resources located on airport property. The EA should properly acknowledge these links in evaluating EJ issues. P21

Here, one might also question whether the airport has a conflict of interest that undercuts its objectivity in evaluating EJ compliance. Having failed to prevail in its 2008-09 attempt to move historic cemeteries on airport land, can KCIA be relied upon to acknowledge African Americans' links to airport historical resources, if such acknowledgement may cloud the airport's future attempts to move historic cemeteries? P22

If the airport wishes to justify categorical exclusion of African Americans from EJ consultation, it needs more justification than claiming computer software made us do it. And it needs to so in a manner that avoids any appearance of conflict of interest.

Writing African Americans Into History

The draft EA, as it stands, effectively writes African Americans out of history. The airport's finding on EJ is contradicted by law, facts, logic and a sense of decency. It has the effect of racial and cultural discrimination. In a city that rightly prides itself on building a world-class 21st Century airport, it would be a bitter irony to perpetuate centuries of discrimination by effectively ignoring the extraordinary history revealed by airport archaeological sites and their extraordinary significance to African American and United States history.

We request that the draft EA be amended to write African Americans into history. This should be done by addressing the EJ issues raised by the Watkins Foundation and other representatives of the Kansas City African American community. This consultation should focus on identifying alternatives for managing airport archaeological sites linked to the experiences of enslaved African Americans and communities in which they lived, which offer such rare and illuminating insight into this period of African American and United States history. P23

References Cited

ERCM

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2009 Cultural Resources Investigations, 23PL1470, 23PL1504 & 23PL1507, Kansas City International Airport (FAA). Prepared by Environmental Research Center of Missouri (ERCM), Jefferson City, Missouri. Report on file, Kansas City International Airport.

Missouri Court of Appeals, Western District

2009 IN RE: The Matter of The REMOVAL OF HUMAN REMAINS FROM CEMETERIES IN KANSAS CITY, PLATTE COUNTY, Missouri. City of Kansas City, Missouri, Appellant, v. Unknown and Unrepresented Persons and Olin Miller, Respondents. No. WD 70006. Decided: November 10, 2009

Appendix 1

SECTION 106 AND NEPA SCOPING OF KCI'S NEW TERMINAL: KCI AS A TRADITIONAL CULTURAL PROPERTY (TCP)

DATE: 3/8/18
TO: Mr. Mr. Chris Babb, Consulting Manager, Brown and Landrum Consultants; Dr. Toni Prawl, Missouri State Historic Preservation Office; Mr. Pat Klein, Director of Aviation.
FROM: Dr. L. Mark Raab, on behalf of the Watkins Foundation of Kansas City, Missouri
RE: Scoping of Section 106 and NEPA compliance of new Kansas City International Airport Terminal

PURPOSE OF THESE COMMENTS

These comments convey concerns of the Watkins Foundation of KCMO and descendant communities about appropriate treatment of historical and cultural resources located in Kansas City International Airport (KCI), as KCI prepares Section 106 and NEPA studies for construction of a new airport terminal complex (under provisions of Section 106 of the National Historic Preservation Act (NHPA) of 1966, the National Environmental Policy Act (NEPA) of 1969, and Federal Aviation Administration (FAA) compliance standards).

The heart of our concerns are the varied and detailed findings that demonstrate KCI as a Traditional Cultural Property (TCP), as provided by Section 106 and FAA compliance standards (FAA 1050.1F Desk Reference, Section 8.2.3.2, July 2015):

> "*A TCP is generally defined as a property that is eligible for the NRHP because of its association with cultural practices or beliefs of a living community that are rooted in that community's history and are important to maintaining the continuing cultural identity of the community.*"

Below, we summarize the data that support a finding of the airport as a TCP, and the implications of such a finding for construction of the airport's new terminal. Our comments are divided into the following main headings:

1.0 KCI AS A TRADITIONAL CULTURAL PROPERTY (TCP)
2.0 AREA OF POTENTIAL EFFECT (APE) OF TERMINAL CONSTRUCTION
3.0 APPROPRIATE IMPACT MITIGATION PROCEDURES

1.0 KCI AS A TRADTIONAL CULTUAL PROPERTY (TCP)

KCI's approximately 11,000 acres is a largely intact rural, 19th Century landscape containing documented
archaeological sites linked to known slave-owning farmers and their slaves. Moreover, surviving descendant individuals and communities, Euro-American and African American, trace their direct descent and cultural identity to these sites, as demonstrated by a variety of data. Three lines of evidence-- archaeological data, descendant histories and legal precedents-- make a convincing case for protecting KCI as a traditional cultural property (TCP) under provisions of federal law:

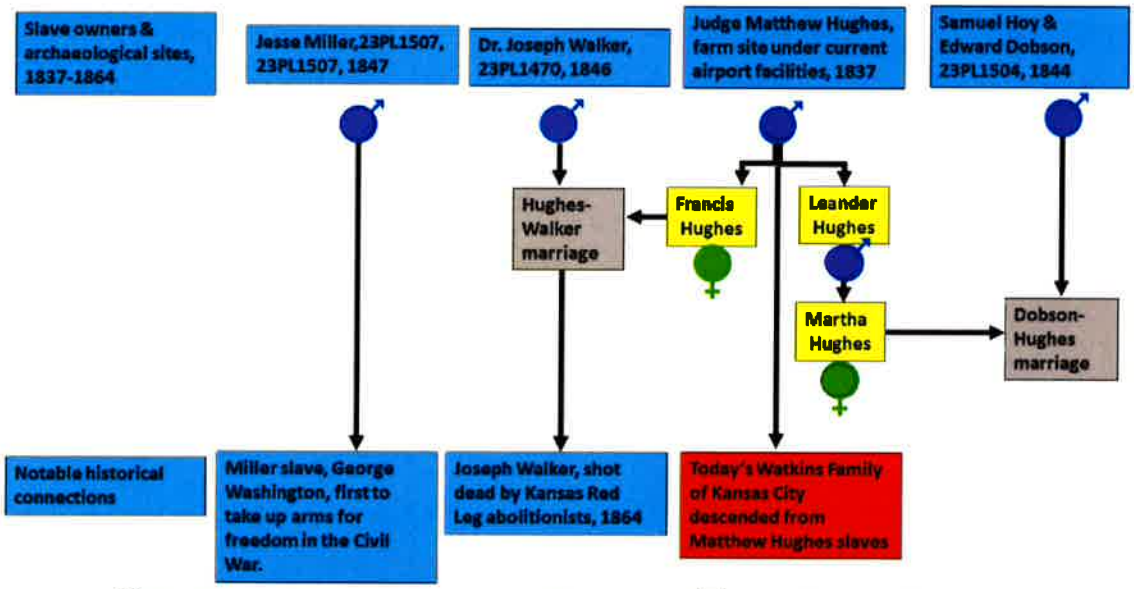
ARCHAEOLOGICAL DATA

In a previous airport Section 106 study, three historical archaeological sites were reported to KCI as potentially eligible for inclusion in the National Register of History Places (Criterion D,

36CFR800 et al.). These three sites, all slave-owning, were subsequently the object of intensive Phase II and III archaeological data recovery investigations, as reported to the airport in Sturdevant-ERC (2009). These investigations included a detailed reconstruction of the historical context of these sites, altogether entailing many thousands of hours of archaeological and historical research. An extraordinarily detailed picture of ante-bellum slave-owing society on the Missouri frontier emerges from this research, including substantial sub-surface architectural remains and a wide range of artifacts associated with life on wealthy, slave-owning hemp plantations of Missouri's Little Dixie. Historical research on these sites shows a high degree of inter-marriage by the farms' slave owners, and likely their slaves. *There is no question that the tightly-knit social networks among slave owners and their slaves formed a cultural landscape, and one of the most documented of its kind in Missouri, and on the larger mid-19th century American frontier.*

Figure 1 below displays some of the 19th Century cultural networks and descendant relationships that are linked the archaeological sites reported in Sturdevant-ERC (2009).

Figure 1: KCI Cultural Landscape and Associated Archaeological Sites



KCI: Four Archaeological Sites and Their Slave Owners

DESCENDANT EVIDENCE

On-going research by Dr. Dawn C. Stricklin of Columbia College, Columbia, Missouri, shows that living individuals and communities can be traced to 19th Century individuals and families, slaves and slave owners, who lived on the archaeological sites described above. Based on continuing, pains-taking research on tax records, military pension records, probate records, slave registers, family oral histories and other sources, Dr. Stricklin's data (Stricklin 2018) documents definitive descent of living persons from the slave owners and slaves outlined in Figure 1. An important example is the African American Watkins family of Kansas City, Missouri. Bruce R. Watkins, Jr. is the son of Bruce R. Watkins, first African American Kansas City Council Member and civil rights pioneer. Bruce R. Watkins, Jr. is curator of the Watkins Culture Center

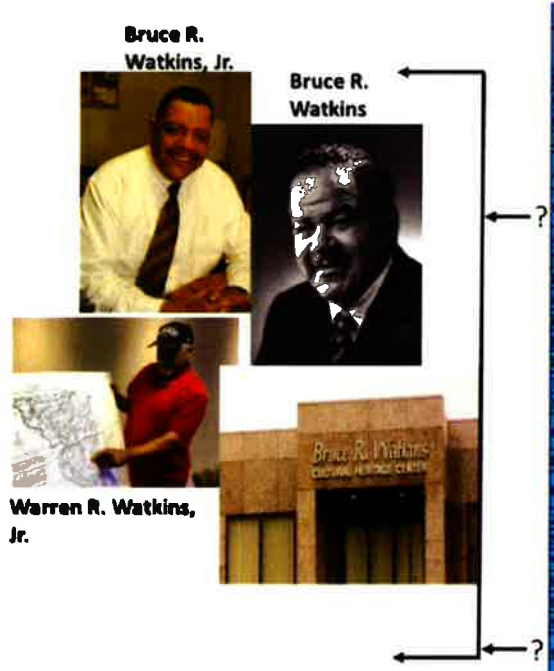
of Kansas City, an influential cultural and civic organization. Another important example is Warren R. Watkins, Jr., president of the Watkins Foundation of Kansas city, Missouri, a community educational resource in African American history and culture, including slave history.

Watkins family oral history has long identified the 19th Century "Hughes Plantation" in today's KCI as the home of the family's slave ancestors. Dr. Stricklin's research has documented this lineage (see Figure 2), showing that the Watkins family is descended from slaves owned by Matthew Hughes in Figure 1, whose slave-holding farm once existed where the current airport was built, and had direct marriage and inheritance ties to two of the other archaeological sites shown in Figure 1.

Yet another example is the late Dr. Jimmy Johnson III, African American archaeologist who originally excavated the Miller Plantation (23PL1507), shown in Figure 1. Dr. Johnson's great-great grandfather, George Washington, escaped to Kansas and joined the Kansas Colored First Infantry Regiment, the first African American unit of the Civil War to take up arms against Confederate forces (Bates County, Missouri at the Battle of Island Mound (today's Island Mound State Park).

The Watkins and Johnson families are only a small subset of the slave descendants that can be connected to KCI cultural resources. Dr. Stricklin's research reveals potentially thousands of descendants of slaves who once occupied KCI.

Figure 2: From Matthew Hughes' Slaves to Kansas City African American Community Leaders



1859-Slaves of Matthew M. Hughes			
1859 INVENTORY & AGE		1859 APPRAISEMENT	
Perry	55	Perry	$600
George	45	George	$550
Coop	35	Coop	$900
Jim	30	Jim	$833
Anderson	20	Anderson	$1,150
Grandison	20	Grandison	$1,075
Alick	18	Alick	$1,000
Ned	18	Ned	$500
Isaac	45	Isaac	$700
Green	14	Green	$825
Fielding	10	Fielding	$625
Pompey	8	Pompey	$425
Doctor	6	Doctor	$400
Tom	9	Tom	$600
Moses	8	Moses	$450
Commodore	8	Commodore	$400
Baby	3	Baby	$300
Charlotte	75	Charlotte	No price
Jenny	100	Jenny	No price
Nancy	60	Nancy	$1,110
Vine	40	Vine	$400
Scindy	55	Scindy	$250
Cloe & baby	25	Cloe & baby	$1,050
Milly	35	Milly	$525
Mira & baby	21	Mira & baby	$950
Daphney	11	Daphney	$500

LEGAL PRECEDENTS

Legal precedents clearly demonstrate that descendants of persons outlined in Figure 1, including Euro-Americans and African Americans, attach important historical and cultural

significance to KCI (Missouri Court of Appeals, Western District, 2009). In 2008, KCI petitioned the Circuit Court of Platte County, Missouri (ibid) to disinter and relocate human remains in four 19th Century cemeteries located on airport land: Brightwell Cemetery, the Miller-Rixey Cemetery, the Samuel Hoy Cemetery, and the Kimsey Cemetery. Two of these cemeteries are associated archaeological sites shown in Figure 1: Jesse Miller Plantation (23PL1507) and the Samuel Hoy farm (23PL1504).

Living Euro-American descendants of persons buried in these cemeteries opposed the airport's petition, and trial and appeals courts sided with the descendants against the airport. However, African American descendants, including Warren R. Watkins, Jr. and Bruce R. Watkins, Jr. shown in Figure 2, opposed removal of these burials on grounds that unmarked burials of their slave ancestors almost certainly exist in vicinity of the historic slave-owning farms and their associated cemeteries shown in Figure 1. These descendants argued that any plans to move the marked cemeteries or build land-disturbing developments around locations that once included slave-owning farms should make a reasonable effort to detect and move unmarked graves (archaeological construction monitoring).

Trial court gave credence to the concerns of African American descendants by appointing them counsel and *guardian ad litem* for unknown and unrepresented respondents who opposed the airport's plans, recognizing that the concerns of parties like the Watkins family should be heard and represented in the case. Commenting on this logic, trial court further commented:

"*Many people believe that there are unmarked slave graves among and around these four cemeteries. Certainly there were many slaves in Platte County before the Civil War, and slaves were known to have been buried in and around family cemeteries like the ones at issue, but preliminary searches of suspected slave burial sites near the family cemeteries have not yielded any signs of human remains.*" (Missouri Court of Appeals, Western District, 2009).

This assessment by the court merely expresses the reality that during the 19th Century, occupants of farms like those in Figure 1, including slaves, were typically buried in or around family cemeteries on farm property, and that the resulting graves may or may not have been permanently marked and therefore detectable today from surface markers. That unmarked slave graves have not been discovered to date does not lessen the virtual certainty of their existence. Nor does it lessen the historical and cultural significance attached by African American descendants to slave-owning farms (archaeological sites) and their associated human burials. *These Legal precedents clearly document that living descendant communities attach important historical and cultural significance to KCI and its archaeological resources.*

For all its remarkable findings, the airport's previous Section 106 investigation (Sturdevant-ERC 2009) was not tasked with the question of whether the sites discussed above and their history have direct ties to living individuals and communities; i.e., whether KCI's 19th Century cultural landscape and its surviving archaeological resources are a Traditional Cultural Property (TCP) for living groups of people. Based on evidence summarized above, but not limited to these data, surviving African American and Euro-American families have active and significant historical and cultural connections to KCI and its archaeological resources. Among these are ancestral graves, marked and unmarked, and the 19th Century cultural landscape that survives in the airport's archaeological record. These communities include surviving African American slave descendants in Kansas City, Missouri and other states. These varied and detailed findings make a strong case for KCI as a TCP, as defined by Section106 and the FAA's compliance standards:

"A TCP is generally defined as a property that is eligible for the NRHP because of its association with cultural practices or beliefs of a living community that are rooted in that community's history and are important to maintaining the continuing cultural identity of the community."

2.0 AREAS OF POTENTIAL EFFECT (APE) OF NEW TERMINAL CONSTRUCTION

Section 106 and NEPA require projects like the new airport to consider Areas of Potential Effect (APE) that are both short- and long-term. Section 106 considers the immediate possible effects of a project on specific historical properties, such as the types of archaeological sites noted Figure 1. NEPA says that *long-term, indirect and cumulative effects* on historical/archaeological resources must also be part of the planning process, if such effects are reasonably foreseeable. It is reasonably foreseeable that more of the airport's 11,000 acres will be developed in response to construction of the new airport. The airport's master plan calls for such long-term development. Accordingly, the new airport's construction should take into account both short-term and long-term, cumulative effects of the project's APE on historical/archaeological resources. Impact mitigation strategies included in of the current Section 106/NEPA plan should address short- and long-term impacts (see Section 3.0 below).

2.1 New terminal construction should consider the project APE to include not only the "footprint' of the new terminal building itself, but also any potentially ground-disturbing activities around it, including things like haul roads; equipment and supplies storage yards; utility pads and trenches and vaults, new roads; runway modifications, etc.

2.2 Given the possibility of buried, unmarked archaeological remains, including human graves, associated with the archaeological resources described above, the APE should consider the possible discovery of such resources during construction excavation.

Ample precedents show that archaeological remains like those described above sometimes survive under existing structures, pavement, roads and other facilities. Historical records show, for example, that the farm of Matthew Hughes, shown in Figure 1, existed under the current airport complex. The possibility that archaeological remains or this or other past settlements and graves exist under present airport constructions should not be dismissed, but rather form part of the planning for the new terminal.

2.3 It should be recognized that loss over time of important archaeological resources like those described in Figure 1 is a significant *cumulative impact* on a protected resource, as defined by NEPA.

The new airport's impact mitigation plan should include explicit provisions for managing the contingencies described above. (See Section 3.0 below).

3.0 APPROPRIATE IMPACT MITIGATION PROCEDURES

We strongly recommend that the airport's new Section 106/NEPA plan include strategies which offer effective ways of mitigating short-term and long-term, cumulative effects on historical/archaeological resources.

3.1 Nominate the airport as a Traditional Cultural Property (TCP) for listing on the National Register of Historic Places (NRHP), based on the following significance criteria (36CRF800), and as amended:

Criterion A, "Event," the property must make a contribution to the major pattern of American history (e.g., expansion of slavery onto the 19th Century American frontier; contributions of KCI settlers to Missouri-Kansas Border War and Civil War; post-Civil War development of Kansas city).

□ **Criterion B**, "Person," is associated with significant people of the American past. (e.g., George Washington, runaway slave; connected to Missouri Island Mound State Park; Joseph Walker, secessionist, killed by Kansas abolitionist forces, Figure 1, and others.)

□ **Criterion D**, "Information potential," is satisfied if the property has yielded or may be likely to yield information important to prehistory or history (e.g., KCI's rural, largely intact 19th Century cultural landscape, including sites in Figure 1., are exceptionally well preserved examples of life on the mid-19th Century American frontier and how that frontier was shaped by the spread of slavery and its related social and economic institutions.)

3.2 Adopt an airport cultural resources management plan that includes appropriate archaeological construction monitoring for detecting and preservation of buried cultural resources, including unmarked human graves.

3.3 Install exhibits in the new airport terminal that interpret to the public the important cultural and historical events associated with the airport, including the airport as a Traditional Cultural Property.

References Cited:

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Stricklin, Dawn C.

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Missouri Court of Appeals, Western District

2009 IN RE: The Matter of The REMOVAL OF HUMAN REMAINS FROM CEMETERIES IN KANSAS CITY, PLATTE COUNTY, Missouri. City of Kansas City, Missouri, Appellant, v. Unknown and Unrepresented Persons and Olin Miller, Respondents. No. WD 70006. Decided: November 10, 2009

Section 106 Compliance:
Disappearing Archaeology and Airport Conflict of Interest

Comments on *Environmental Assessment and Section 106 Evaluation, Replacement Terminal, Kansas City International Airport, Draft-August 2018.*

by:
The Watkins Foundation,
Kansas City, Missouri

3 September 2018

Summary of Comments:

Kansas City International Airport (KCIA) has issued a draft Environmental Assessment (EA) which can be seen here: https://www.kci-edgemoor.com/documents/ . KCIA is required to consider the potential effects of a proposed new airport terminal on cultural, historical and archaeological resources as required by Section 106 of the National Historic Preservation Act (NHPA). We have reviewed the EA's Section 106 report by Golder Associates and offer the following comments:

- "Deep testing" of the new terminal construction area is based on second-hand data of unknown scientific reliability.] P24
- The Section 106 report mysteriously omits previously documented archaeological data of exceptional significance to African American and U.S. history.] P25
- The Section 106 report fails to acknowledge the airport's legal conflict of interest in evaluating airport archaeological sites, undermining its credibility as a fair broker of the current environmental assessment.] P26

What Is Section 106?

Section 106 if the National Historic Preservation Act (NHPA) require KCIA to consider possible adverse effects of the proposed new airport terminal on properties of cultural, historical and archaeological significance. The EA includes a Section 106 report by Golder Associates, a contractor selected by the airport to conduct this study. The project's RFP/Q included review of previous airport historical and archaeological work, subsurface "deep testing" of the area of new terminal construction, and assessment of vibration, notice and view shed effects within an area of 7,000+ acres. The Golder report can be seen on pages 311-448 of the EA.

"Deep Testing" Based on Second-Hand Data

In a letter of 3-12-18 to the FAA regarding the proposed action, Missouri SHPO made this finding:

"We have determined that there is a moderate to high potential of the presence of archaeological sites in areas where cut/grading has not been established within the direct APE. Depending on the placement and disturbance level of new construction for this project, there is

the possibility for buried deposits under fill placed for the current terminals. An archaeological survey, with deep testing as deemed appropriate, should be conducted, dependent upon further review of plans. This survey should be completed prior to the initiation of project-related construction activities."

The Request for Proposal\Qualifications (RFP\Q) issued by the Landrum and Brown consultants for the Section 106 study also refers to "deep testing":

"...a field survey and deep testing will be conducted. The number of sites and specific locations should be recommended by the Proposer...It is anticipated that visual inspection would be combined with various levels of subsurface excavation. Methods utilized may include pedestrian surface survey, shovel testing probes, and and/or auger probes."

The bulk of the Golder report's technical analysis deals with this deep testing. While the project RFP\Q refers to shovel testing and (soil) auger probes, it was left to the contractor, Golder Associates, to determine the specific methods to be employed. These methods fall into two categories. One of these is "shovel test pits" (STPs) and mechanically excavated trenches. The second category is the most technically challenging, involving soil/sediment cores or probes capable of reaching depths between approximately 10 to 20 meters below the surface of the current airport terminal complex. These deep cores are the most problematic part of Golder's findings. The Golder report describes these as follows: P27

"In the first quarter of 2018, TSi Geotechnical Inc. (TSi) completed a subsurface and geotechnical engineering evaluation to assist with the proposed design and construction of the new airport terminal, parking garage and pavements as the KCI airport (TSi 2018). This study, which consisted of numerous borings encountered existing fill extending to depths of approximately 5.4 to 18.7 meters" (EA page 333).

The Golder report notes that resulting sediment/fill cores were saved and later examined by Golder investigators. There are significant problems with using these data for detecting possible buried archaeological deposits:

- The cores in question were obtained for engineering and construction purposes. Were the personnel who conducted this coring trained to recognize archaeological deposits and instructed to look for and record such deposits if encountered? There is no mention in the report of such qualifications.

- Were all core materials saved? It's not unusual for cores to be saved that mark the upper lower depths of fill/sediment facies; i.e., cores that mark a change in material significant to engineering or construction objectives. The Golder report does not say whether the cores examined represent a complete stratigraphic profile.

- Were the TSi cores taken from all areas with a high potential of buried archaeological deposits? The Golder report does not present a rationale or explicit sampling strategy for testing high-potential areas and whether the available geotechnical cores sampled these areas in a reasonably comprehensive manner. The use of such second-hand data poses a large degree of sampling uncertainty. P28

The basic problem is using sub-surface coring samples taken for purposes other than archaeological research. We believe the SHPO's objectives and the project scope of work were based on a reasonable presumption that the study contractor would conduct and directly supervise deep-coring procedures, not rely on second-hand data of questionable scientific reliability. We suggest that the EA should not be accepted until such testing has been accomplished. P28

Mystery of KCI's Missing Archaeology

In many ways, the mid-19th Century Missouri frontier determined America's fate. Farmers, mostly Southerners, brought slaves to Little Dixie, rich agricultural lands along the Missouri River where they could make fortunes growing crops like hemp and tobacco. The result was a border war between slave-holding Missouri and abolitionist Kansas. John Brown and Kansan Jayhawks killed, burned and robbed in Missouri. Pro-Confederate guerilla fighters like William Quantrill brought death and destruction to Kansas. Historians describe this bloody border as the "cauldron where the Civil War boiled." Runway Missouri slaves were the first take up arms against the Confederacy in a life or death fight for their freedom. After the war ended, freed Missouri slaves helped to build Kansas City, producing some of the most important institutions and civic leaders in the city's modern history. In 2009, the U.S. Congress created Freedom's Frontier National Heritage Area, 41 counties straddling the Missouri-Kansas border, to commemorate and interpret to the public this epic time and place in American history: http://freedomsfrontier.org/ . These events, and many of the people who lived them, including enslaved African Americans, are embodied today by exceptionally preserved airport archaeological sites that are nothing less than national historic treasures.

KCIA's Most Important Archaeological Discovery

One of the basic tasks of Section 106 report is to assess previous archaeological studies of airport property. The project RFP/Q states that, "Background research will be conducted by the Proposer to summarize investigation efforts to date and the likelihood of potential resources in the Project Area." Here, it is important to note that the Project Area defined by this study (APE) is not simply the "footprint" of the new terminal but rather a direct and indirect APE totaling about 7,700 acres. Moreover, as we show below and in attached Appendix 1, previous archaeological research demonstrates that highly significant archaeological resources are documented around and within the "footprint" area that makes up the project's direct APE. As we show below, SHPO guidance emphasizes testing for possible buried archaeological resources in terminal area because this was once the site of archaeologically significant 19th Century farms and related cultural features, including possible human graves. Yet, curiously, the Golder report references none of these archaeological resources and how they might condition a search for buried cultural deposits. The Golder report notes at least six (6) previous archaeological investigations occurred throughout the project area (page 327, EA draft). How these data influenced the Golder study is unknown, since these previous investigations are not mapped, evaluated or included in the references cited section of the Golder report. This is a basic deficiency in scientific reporting and best-practices of CRM reports. P29

To Golder report contains significant inaccuracies about previously recorded archaeological resources. Table 2 of the Golder report (EA pages 328-330) lists some of the archaeological sites recorded by previous archaeological studies. This list offers no discussion of the relative importance of any of these sites to the current investigation or references to the sources of these data. Table 2 significantly mispresents three previously discovered archaeological sites of

exceptional historical and archaeological significance. These sites are noted on page 329-330 of the EA and discussed in Appendix 1 below:

- 23PL1507 (Miller Farm, National Register eligible; ERCM 2008, 2009)
- 23PL1504 (potentially Register eligible; ERCM 2008)
- 23PL1470 (potentially Register eligible; ERCM 2008)

These three sites are without question the most significant archaeological discovery at KCIA to date and remarkable by any scientific and historical standards. Even a casual reading of the airport's own excavation report of these sites makes this point inescapable (ERCM 2009). These sites have yielded thousands of artifacts which paint a remarkably detailed picture of life on slave-holding farms and the material culture and social networks of slave owners and slaves. This research by Sturdevant *et al.* (ERCM 2009) unambiguously identifies the importance of these farms to understanding the spread of slavery to the antebellum American frontier, the lives of the people who lived there, and the momentous events in American history summarized earlier. Oddly, the Golder report makes no reference to the report documenting this remarkable discovery.

We should not lose sight of the fact that these discoveries are more than dusty artifacts and impersonal historical events. KCIA's archaeological resources are intimately connected to living communities. As discussed In Appendix 1 below, members of the Kansas City African American community, and elsewhere in the United States, are descended from slaves living on the farms listed above. These descendant families helped to build modern Kansas City. Among these descendants was Bruce R. Watkins, first black City Council Member and civil rights leader. His legacy can be seen today in the city's Bruce R. Watkins Cultural Center (Appendix 1).

The airport's archaeological farms are the embodiment of an extraordinary era in African American and United States history. These farms are the archaeological signatures of the expansion of slavery to the American frontier and the role that slavery played in the Missouri-Kansas Border War and American Civil War. Site PL1507, Miller Planation, launched one of the most heroic personal stories involved in the history of the region and the United States. A slave who ran away from this farm, George Washington, joined other slaves to form the first military unit to engage Confederate forces in armed combat during the whole of the American Civil War. This was the first time that ex-slaves took up arms to free themselves in the bloodiest war in American history. This fight for freedom is commemorated at the Battle of Island Mound State Park in Bates County, Missouri, the state's newest historical park.

Mysterious Disappearing Archaeology

When we examine the Section 106 report prepared by Golder Associates (pages 311-448 of the EA) the history and archaeology described are mysteriously absent. Moreover, the significance of the three archaeological sites tied to this history are materially misrepresented in the Golder report:

- Table 2 of the Golder report misrepresents the Federal preservation status of sites PL1470, PL1504 and PL1507. These are listed as "unevaluated" in terms of eligibility for the National Register of Historic Places. In fact, a 2008 airport archaeological study (ERCM 2008) found PL1470 (Walker farm) and PL1504 (Hoy farm) potentially eligible for listing by the National Register of Historic Places and PL1507 (Miller Plantation) as eligible for listing. Follow-up excavation of these sites is reported in ERCM (2009), which consumed over 3,600 man-hours

P30

of research and resulted in thousands of curated artifacts. Site PL1507, Miller Plantation, remains Register eligible. These are not minor omissions but material biases against complete and informed assessment of the airport's archaeological resources. These omissions also obscure airport Federal accountability. Archaeological sites found potentially or demonstrably Register eligible trigger Federal protection under Section 106 of the NHPA. As previously noted, excavation of these sites, detailed in ERCM (2009) yielded exceptionally well preserved sub-surface structural remains and thousands of historic artifacts, including caches of tools and many kinds of domestic artifacts. These compare favorably with the best preserved historical archaeological deposits found in the United States.

P30

- References to the reports which originally documented these three sites (ERCM 2008 and 2009) are nowhere found in the Golder report. Readers unfamiliar with the history of airport archaeological investigation would have no clue these reports even exist. This effectively shuts out scholars and independent observers. It also puts reviewers of airport historic preservation compliance in the dark about manifestly important scientific and historical findings. This is not a minor oversight. In effect, the Golder report writes these sites out of the exceptionally significant history they clearly embody.

P31

Honest Errors or Conflict of Interest and Discrimination?

While one might argue that the omissions described above are honest errors, the fact that all sources of information relating to some of the airport's most important archaeological sites are systematically and mysteriously missing from the Golder report should raise serious concerns:

- **KCI Legal Conflict of Interest-** As discussed in Appendix 1 below, KCIA petitioned the Circuit Court of Platte County, Missouri a decade ago for permission to move four 19th century cemeteries located on KCIA property. Take note that these cemeteries were created by the occupants of sites PL1470, PL 1504 and PL1507. African American and Euro-American descendants of persons buried in and around these cemeteries opposed this petition. Court granted standing to the descendants to oppose the petition, including a court-appointed *guardian ad litem* for the descendants. The court did this to acknowledge, in part, descendants' claims that slave burials may exist in or in proximity to the four historic cemeteries. The appellate court describes these cemeteries:

"City has acquired, through purchase and through eminent domain,[1] approximately 11,000 acres of land that has been designated as KCI property. On the KCI property, there are four small, private, family cemeteries. These cemeteries are known as the Brightwell Cemetery, the Miller-Rixey Cemetery, the Samuel Hoy Cemetery, and the Kimsey Cemetery."
https://caselaw.findlaw.com/mo-court-of-appeals/1496223.html

The Miller-Rixey cemetery in this citation is the burial place of persons who lived on archaeological site PL1507. The Samuel Hoy cemetery is the burial location of persons living on archaeological site PL1504. Both cemeteries are maintained by living descendants of people who lived on these 19th Century farms and buried their kin in the respective family cemeteries. African American descendants of slaves who lived on these or nearby farms have also declared the importance of the cemeteries to their cultural history because of the likelihood of slave burials in or near these cemeteries (See Appendix 1 below).

The airport's petition was rejected by both trial and appellate courts (Missouri Court of Appeals, Western District, 2009). This is where a significant conflict of interest arises. Suppose the Golder report or other sections of the EA were to fully document the archaeological sites mentioned above, including their connection to airport historic cemeteries and living white and black descendants. There can be little doubt this information would strengthen the legal standing of people who might oppose moving the cemeteries in the future. The airport's path to moving these cemeteries would likely be made easier by writing an EA which conveniently leaves out precisely the history and sources and information we described above. For this reason, we believe that the EA should be prepared with this conflict of interest acknowledged. To act as a fair broker in the preparation of the EA, the airport must provide a full and explicit accounting of the historical, archaeological and legal precedents that are currently omitted from the Golder report and other relevant sections of the EA. P32

Discrimination Against African Americans- As the draft EA stands, including the Golder report, African Americans are effectively written out of their own history. The EA, wittingly or unwittingly, ignores the great significance of the airport's historical archaeological resources to African American, Missouri and American history. It also flouts the declared importance of these resources to the contemporary Kansas City African American community as declared to the SHPO and the airport during the scoping phase of the EA (Appendix 1 below). The effect is racial and cultural discrimination. This raises troubling questions about compliance with anti-discrimination laws and how an enlightened, 21st Century airport and city should be treating minority history and culture. The EA should not perpetuate centuries of discrimination by effectively writing African Americans out the airport's archaeological record.

We therefore request that the draft EA be amended to write African Americans into this history. The EA should not be accepted until this information is appropriately integrated into the Golder report and other relevant sections of the EA. P33

"Thorough and Adequate Monitoring of Cultural Resources"?

The Golder report and regulatory apparatus associated with it is an example of what happens when we lose sight of why we should protect archaeological resources. When we get lost in government acronyms and the technical details of excavation and report-writing, we risk forgetting that archaeological resources can embody the cultural memories and history of living communities. We should think about this and how we allow these communities to access and comment on archaeological preservation. Missouri SHPO's letter endorsing the results of the Golder study is appended to the Golder report (page 379 of the EA). This suggests the letter may have been forthcoming before the Golder report was submitted to the airport. It certainly indicates that the SHPO signaled approval of the Golder report and the EA long before these were available for independent expert evaluation or public review and comment. In our view, this was an unseemly and hasty maneuver with unappealing implications for governmental transparency and accountability. In the light of the problems outlined above, we may also doubt the letter's hasty conclusion that the Golder report is a "thorough and adequate monitoring of...cultural resources." P34

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ERCM
2008 Cultural Resource Investigations, Phase I Survey, Kansas City International Airport, Platte County, Missouri (FAA). Prepared by Environmental Research Center of Missouri (ERCM), Jefferson City, Missouri. Report on file, Kansas City International Airport.

ERCM (Environmental Research Center of Missouri)

2009 Cultural Resources Investigations, 23PL1470, 23PL1504 & 23PL1507, Kansas City International Airport (FAA). Prepared by Environmental Research Center of Missouri (ERCM), Jefferson City, Missouri. Report on file, Kansas City International Airport.

Missouri Court of Appeals, Western District
2009 IN RE: The Matter of The REMOVAL OF HUMAN REMAINS FROM CEMETERIES IN KANSAS CITY, PLATTE COUNTY, Missouri. City of Kansas City, Missouri, Appellant, v. Unknown and Unrepresented Persons and Olin Miller, Respondents. No. WD 70006. Decided: November 10, 2009

Appendix 1

SECTION 106 AND NEPA SCOPING OF KCI'S NEW TERMINAL: KCI AS A TRADITIONAL CULTURAL PROPERTY (TCP)

DATE: 3/8/18
TO: Mr. Mr. Chris Babb, Consulting Manager, Brown and Landrum Consultants; Dr. Toni Prawl, Missouri State Historic Preservation Office; Mr. Pat Klein, Director of Aviation.
FROM: Dr. L. Mark Raab, on behalf of the Watkins Foundation of Kansas City, Missouri
RE: Scoping of Section 106 and NEPA compliance of new Kansas City International Airport Terminal

PURPOSE OF THESE COMMENTS

These comments convey concerns of the Watkins Foundation of KCMO and descendant communities about appropriate treatment of historical and cultural resources located in Kansas City International Airport (KCI), as KCI prepares Section 106 and NEPA studies for construction of a new airport terminal complex (under provisions of Section 106 of the National Historic Preservation Act (NHPA) of 1966, the National Environmental Policy Act (NEPA) of 1969, and Federal Aviation Administration (FAA) compliance standards).

The heart of our concerns are the varied and detailed findings that demonstrate KCI as a Traditional Cultural Property (TCP), as provided by Section 106 and FAA compliance standards (FAA 1050.1F Desk Reference, Section 8.2.3.2, July 2015):

> "*A TCP is generally defined as a property that is eligible for the NRHP because of its association with cultural practices or beliefs of a living community that are rooted in that community's history and are important to maintaining the continuing cultural identity of the community.*"

Below, we summarize the data that support a finding of the airport as a TCP, and the implications of such a finding for construction of the airport's new terminal. Our comments are divided into the following main headings:

1.0 KCI AS A TRADITIONAL CULTURAL PROPERTY (TCP)
2.0 AREA OF POTENTIAL EFFECT (APE) OF TERMINAL CONSTRUCTION
3.0 APPROPRIATE IMPACT MITIGATION PROCEDURES

1.0 KCI AS A TRADTIONAL CULTUAL PROPERTY (TCP)

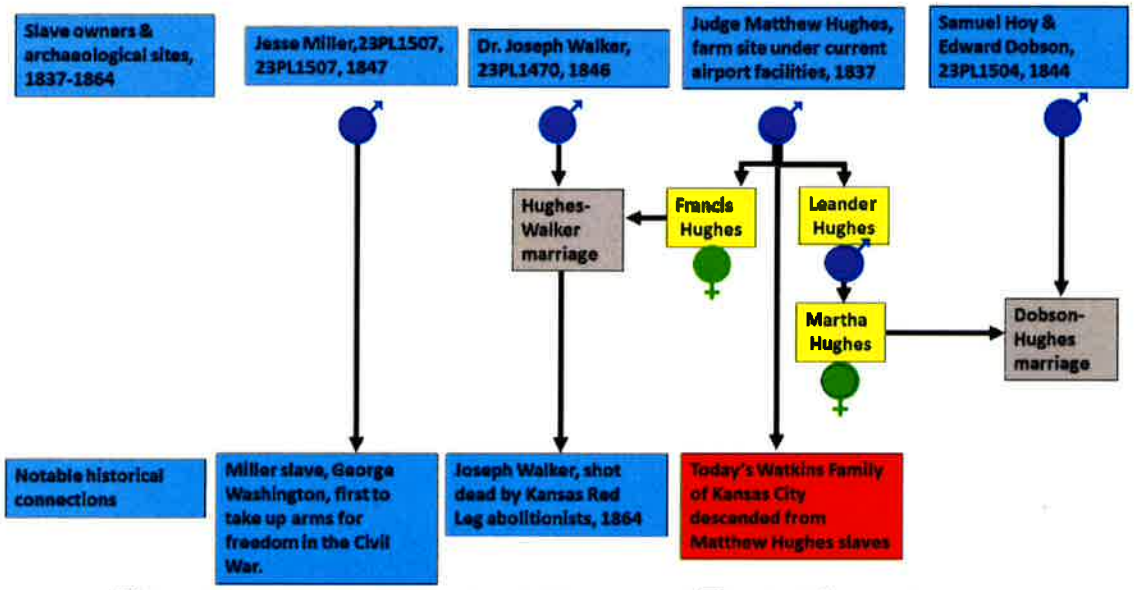
KCI's approximately 11,000 acres is a largely intact rural, 19th Century landscape containing documented
archaeological sites linked to known slave-owning farmers and their slaves. Moreover, surviving descendant individuals and communities, Euro-American and African American, trace their direct descent and cultural identity to these sites, as demonstrated by a variety of data. Three lines of evidence-- archaeological data, descendant histories and legal precedents-- make a convincing case for protecting KCI as a traditional cultural property (TCP) under provisions of federal law:

ARCHAEOLOGICAL DATA

In a previous airport Section 106 study, three historical archaeological sites were reported to KCI as potentially eligible for inclusion in the National Register of History Places (Criterion D, 36CFR800 et al.). These three sites, all slave-owning, were subsequently the object of intensive Phase II and III archaeological data recovery investigations, as reported to the airport in Sturdevant-ERC (2009). These investigations included a detailed reconstruction of the historical context of these sites, altogether entailing many thousands of hours of archaeological and historical research. An extraordinarily detailed picture of ante-bellum slave-owing society on the Missouri frontier emerges from this research, including substantial sub-surface architectural remains and a wide range of artifacts associated with life on wealthy, slave-owning hemp plantations of Missouri's Little Dixie. Historical research on these sites shows a high degree of inter-marriage by the farms' slave owners, and likely their slaves. *There is no question that the tightly-knit social networks among slave owners and their slaves formed a cultural landscape, and one of the most documented of its kind in Missouri, and on the larger mid-19th century American frontier.*

Figure 1 below displays some of the 19th Century cultural networks and descendant relationships that are linked the archaeological sites reported in Sturdevant-ERC (2009).

Figure 1: KCI Cultural Landscape and Associated Archaeological Sites



KCI: Four Archaeological Sites and Their Slave Owners

DESCENDANT EVIDENCE

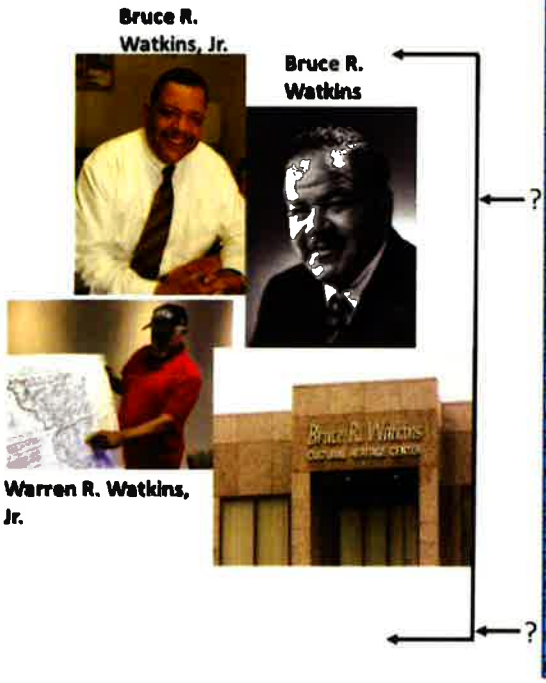
On-going research by Dr. Dawn C. Stricklin of Columbia College, Columbia, Missouri, shows that living individuals and communities can be traced to 19th Century individuals and families, slaves and slave owners, who lived on the archaeological sites described above. Based on continuing, pains-taking research on tax records, military pension records, probate records, slave registers, family oral histories and other sources, Dr. Stricklin's data (Stricklin 2018) documents definitive descent of living persons from the slave owners and slaves outlined in Figure 1. An important example is the African American Watkins family of Kansas City, Missouri. Bruce R. Watkins, Jr. is the son of Bruce R. Watkins, first African American Kansas City Council Member and civil rights pioneer. Bruce R. Watkins, Jr. is curator of the Watkins Culture Center of Kansas City, an influential cultural and civic organization. Another important example is Warren R. Watkins, Jr., president of the Watkins Foundation of Kansas city, Missouri, a community educational resource in African American history and culture, including slave history.

Watkins family oral history has long identified the 19th Century "Hughes Plantation" in today's KCI as the home of the family's slave ancestors. Dr. Stricklin's research has documented this lineage (see Figure 2), showing that the Watkins family is descended from slaves owned by Matthew Hughes in Figure 1, whose slave-holding farm once existed where the current airport was built, and had direct marriage and inheritance ties to two of the other archaeological sites shown in Figure 1.

Yet another example is the late Dr. Jimmy Johnson III, African American archaeologist who originally excavated the Miller Plantation (23PL1507), shown in Figure 1. Dr. Johnson's great-great grandfather, George Washington, escaped to Kansas and joined the Kansas Colored First Infantry Regiment, the first African American unit of the Civil War to take up arms against Confederate forces (Bates County, Missouri at the Battle of Island Mound (today's Island Mound State Park).

The Watkins and Johnson families are only a small subset of the slave descendants that can be connected to KCI cultural resources. Dr. Stricklin's research reveals potentially thousands of descendants of slaves who once occupied KCI.

Figure 2: From Matthew Hughes' Slaves to Kansas City African American Community Leaders



1859-Slaves of Matthew M. Hughes			
1859 INVENTORY & AGE		1859 APPRAISEMENT	
Perry	55	Perry	$600
George	45	George	$550
Coop	35	Coop	$900
Jim	30	Jim	$833
Anderson	20	Anderson	$1,150
Grandison	20	Grandison	$1,075
Alick	18	Alick	$1,000
Ned	18	Ned	$900
Isaac	15	Isaac	$700
Green	14	Green	$825
Fielding	10	Fielding	$625
Pompey	8	Pompey	$425
Doctor	6	Doctor	$400
Tom	9	Tom	$600
Moses	8	Moses	$450
Commodore	6	Commodore	$400
Baby	3	Baby	$300
Charlotte	75	Charlotte	No price
Jenny	100	Jenny	No price
Nancy	60	Nancy	$1,110
Vine	40	Vine	$400
Schidy	55	Schidy	$350
Cloe & baby	25	Cloe & baby	$1,050
Milly	35	Milly	$525
Mira & baby	21	Mira & baby	$950
Daphney	11	Daphney	$500

LEGAL PRECEDENTS

Legal precedents clearly demonstrate that descendants of persons outlined in Figure 1, including Euro-Americans and African Americans, attach important historical and cultural significance to KCI (Missouri Court of Appeals, Western District, 2009). In 2008, KCI petitioned the Circuit Court of Platte County, Missouri (ibid) to disinter and relocate human remains in four 19th Century cemeteries located on airport land: Brightwell Cemetery, the Miller-Rixey Cemetery, the Samuel Hoy Cemetery, and the Kimsey Cemetery. Two of these cemeteries are associated archaeological sites shown in Figure 1: Jesse Miller Plantation (23PL1507) and the Samuel Hoy farm (23PL1504).

Living Euro-American descendants of persons buried in these cemeteries opposed the airport's petition, and trial and appeals courts sided with the descendants against the airport. However, African American descendants, including Warren R. Watkins, Jr. and Bruce R. Watkins, Jr. shown in Figure 2, opposed removal of these burials on grounds that unmarked burials of their slave ancestors almost certainly exist in vicinity of the historic slave-owning farms and their associated cemeteries shown in Figure 1. These descendants argued that any plans to move the marked cemeteries or build land-disturbing developments around locations that once included slave-owning farms should make a reasonable effort to detect and move unmarked graves (archaeological construction monitoring).

Trial court gave credence to the concerns of African American descendants by appointing them counsel and *guardian ad litem* for unknown and unrepresented respondents who opposed the airport's plans, recognizing that the concerns of parties like the Watkins family should be heard and represented in the case. Commenting on this logic, trial court further commented:

"*Many people believe that there are unmarked slave graves among and around these four cemeteries. Certainly there were many slaves in Platte County before the Civil War, and slaves were known to have been buried in and around family cemeteries like the ones at issue, but preliminary searches of suspected slave burial sites near the family cemeteries have not yielded any signs of human remains.*" (Missouri Court of Appeals, Western District, 2009).

This assessment by the court merely expresses the reality that during the 19th Century, occupants of farms like those in Figure 1, including slaves, were typically buried in or around family cemeteries on farm property, and that the resulting graves may or may not have been permanently marked and therefore detectable today from surface markers. That unmarked slave graves have not been discovered to date does not lessen the virtual certainty of their existence. Nor does it lessen the historical and cultural significance attached by African American descendants to slave-owning farms (archaeological sites) and their associated human burials. *These Legal precedents clearly document that living descendant communities attach important historical and cultural significance to KCI and its archaeological resources.*

For all its remarkable findings, the airport's previous Section 106 investigation (Sturdevant-ERC 2009) was not tasked with the question of whether the sites discussed above and their history have direct ties to living individuals and communities; i.e., whether KCI's 19th Century cultural landscape and its surviving archaeological resources are a Traditional Cultural Property (TCP) for living groups of people. Based on evidence summarized above, but not limited to these data, surviving African American and Euro-American families have active and significant historical and cultural connections to KCI and its archaeological resources. Among these are ancestral graves, marked and unmarked, and the 19th Century cultural landscape that survives in the airport's archaeological record. These communities include surviving African American slave descendants in Kansas City, Missouri and other states. These varied and detailed findings make a strong case for KCI as a TCP, as defined by Section106 and the FAA's compliance standards:

> "*A TCP is generally defined as a property that is eligible for the NRHP because of its association with cultural practices or beliefs of a living community that are rooted in that community's history and are important to maintaining the continuing cultural identity of the community.*"

2.0 AREAS OF POTENTIAL EFFECT (APE) OF NEW TERMINAL CONSTRUCTION

Section 106 and NEPA require projects like the new airport to consider Areas of Potential Effect (APE) that are both short- and long-term. Section 106 considers the immediate possible effects of a project on specific historical properties, such as the types of archaeological sites noted Figure 1. NEPA says that *long-term, indirect and cumulative effects* on historical/archaeological resources must also be part of the planning process, if such effects are reasonably foreseeable. It is reasonably foreseeable that more of the airport's 11,000 acres will be developed in response to construction of the new airport. The airport's master plan calls for such long-term development. Accordingly, the new airport's construction should take into account both short-term and long-term, cumulative effects of the project's APE on historical/archaeological

resources. Impact mitigation strategies included in of the current Section 106/NEPA plan should address short- and long-term impacts (see Section 3.0 below).

2.1 New terminal construction should consider the project APE to include not only the "footprint' of the new terminal building itself, but also any potentially ground-disturbing activities around it, including things like haul roads; equipment and supplies storage yards; utility pads and trenches and vaults, new roads; runway modifications, etc.

2.2 Given the possibility of buried, unmarked archaeological remains, including human graves, associated with the archaeological resources described above, the APE should consider the possible discovery of such resources during construction excavation.

Ample precedents show that archaeological remains like those described above sometimes survive under existing structures, pavement, roads and other facilities. Historical records show, for example, that the farm of Matthew Hughes, shown in Figure 1, existed under the current airport complex. The possibility that archaeological remains or this or other past settlements and graves exist under present airport constructions should not be dismissed, but rather form part of the planning for the new terminal.

2.3 It should be recognized that loss over time of important archaeological resources like those described in Figure 1 is a significant *cumulative impact* on a protected resource, as defined by NEPA.

The new airport's impact mitigation plan should include explicit provisions for managing the contingencies described above. (See Section 3.0 below).

3.0 APPROPRIATE IMPACT MITIGATION PROCEDURES

We strongly recommend that the airport's new Section 106/NEPA plan include strategies which offer effective ways of mitigating short-term and long-term, cumulative effects on historical/archaeological resources.

3.1 Nominate the airport as a Traditional Cultural Property (TCP) for listing on the National Register of Historic Places (NRHP), based on the following significance criteria (36CRF800), and as amended:

Criterion A, "Event," the property must make a contribution to the major pattern of American history (e.g., expansion of slavery onto the 19th Century American frontier; contributions of KCI settlers to Missouri-Kansas Border War and Civil War; post-Civil War development of Kansas city).

☐ **Criterion B**, "Person," is associated with significant people of the American past. (e.g., George Washington, runaway slave; connected to Missouri Island Mound State Park; Joseph Walker, secessionist, killed by Kansas abolitionist forces, Figure 1, and others.)

☐ **Criterion D**, "Information potential," is satisfied if the property has yielded or may be likely to yield information important to prehistory or history (e.g., KCI's rural, largely intact 19th Century cultural landscape, including sites in Figure 1., are exceptionally well preserved examples of life on the mid-19th Century American frontier and how that frontier was shaped by the spread of slavery and its related social and economic institutions.)

3.2 Adopt an airport cultural resources management plan that includes appropriate archaeological construction monitoring for detecting and preservation of buried cultural resources, including unmarked human graves.

3.3 Install exhibits in the new airport terminal that interpret to the public the important cultural and historical events associated with the airport, including the airport as a Traditional Cultural Property.

References Cited:

Sturdevant, ERCM

2009 Cultural Resource Investigations 23PL1470, 23PL1504 & 23PL1507 Kansas City International Airport Platte County, Missouri, FAA Project, Prepared for: City of Kansas City, Missouri, prepared By: Environmental Research Center of Missouri, Inc. 1201 Moreau Drive Jefferson City, Missouri.

Stricklin, Dawn C.

2018 KCI Slave Holding Families v. 1-25-18, manuscript in author's possession.

Missouri Court of Appeals, Western District

2009 IN RE: The Matter of The REMOVAL OF HUMAN REMAINS FROM CEMETERIES IN KANSAS CITY, PLATTE COUNTY, Missouri. City of Kansas City, Missouri, Appellant, v. Unknown and Unrepresented Persons and Olin Miller, Respondents. No. WD 70006. Decided: November 10, 2009

Dear Dr. Prawl, Missouri State Historic Preservation Office

RE: KCI Section 106 compliance review

Thank you for your email of 11 December, indicating that your office will review available records regarding Kansas City International Airport's (KCI) compliance with Section 106 of the NHPA. Perhaps we can narrow this task somewhat by summarizing two specific examples of the concerns that we conveyed in our letter of 3 October to the Advisory Council on Historic Preservation. Two cultural resources reports submitted by KCI to your office and the FAA raise troubling questions about the airport's past and future compliance with Section 106. These reports document a disturbing history of undocumented destruction of federally protected historic resources spanning three decades, as well as risk to historic resources in the future. These reports, referenced below, are by Sturdevant 1987 and 2008:

P35

Questions posed by the 1987 Sturdevant report:

Page 36: This report references 11 historic structures on airport land identified by two previous airport cultural resources surveys of 1978 and 1980 (do these still exist in your files; KCI files?). This report notes that two of the structures reported in 1978 and/or 1980 had been destroyed by 1987 under apparently undocumented circumstances. The nine remaining structures were evaluated for National Register eligibility. The unexplained destruction of these two historic properties is only the beginning of a three-decades-long pattern of undocumented destruction of historic resources on airport land. A pattern that remains unexplained to this day.

Pages 19 and 27-33: The 1987 survey found that five (5) of the nine (9) structures noted above were Register eligible as exceptionally well preserved examples of historic rural architecture. These findings were clearly communicated to the airport in the 1987 report, and the airport presumably submitted this report, without comment or revision, to the FAA for certification of compliance with Section 106.

Submission of this report created an affirmative legal obligation on the part of the airport to justify and document any adverse effects on these properties. Contrary to this obligation, all five of these structures have apparently been destroyed under conditions that remain undocumented to this day. This circumstance is acknowledged in the subsequent 2008 Sturdevant report of archaeological survey of KCI:

"An evaluation of historic structures located on airport property was carried out in 1987 (Sturdevant 1987). Five of nine structures included in the evaluation were recommended eligible for NRHP listing. At the time of the present investigation, all of the structures evaluated had been razed. No records have been found regarding Section 106 compliance procedures prior or subsequent to the removal of the structures." (Sturdevant 2008: 22).

Like the two historic structures recorded in the 1978 and 1980 surveys, these five historic sites—officially Register eligible and reported to SHPO and the FAA—disappeared into an undocumented black hole of destruction. In a meeting with airport management this year, we directly asked for an explanation of what happened to the seven structures named in the two Sturdevant reports. The answer: We have no idea. Whatever happened was before our time. There are apparently no records.

Other accounts exist of the destruction of these properties. Three local families have maintained historic cemeteries in the airport for decades. They regularly visit these cemeteries. These families

(Rixey, Knighton, Miller) have lived in the area for 100 years or more. These families have direct knowledge of the historic structures in question going back in time for many decades. Members of these families have reported to us that the structures referred to in the 1987 and 2008 Sturdevant reports were burned to ground by unknown parties sometime after 1987, and the remaining debris scattered over a large area by heavy equipment or carried away. It might be appropriate to interview these witnesses.

We believe the airport remains obligated under Section 106 to account for the record what happened to these structures. Moreover, we suggest that the apparent loss of these structures does not end the airport's obligation to manage these properties as potentially significant historic resources. Given the age and cultural significance of these properties, do significant sub-surface archaeological deposits survive on these properties? Given the unknowns surrounding these properties, unknowns created by a failure of the airport to manage protected historic properties, we suggest that a phase-two archaeological revaluation of the properties seems an appropriate remedial measure.

Questions posed by the 2008 Sturdevant report:

Pages 57-58: One 19th century farm site (23PL1508- Miller farm) located in KCI was found Register eligible; a second farm (23PL1504- Davis farm) was found potentially eligible.

Page 60: Regarding the Miller farm, the 2008 sturdevant report recommends "that an MOA be developed among with an appropriate data recovery plan for implementation of mitigative procedures under Section 106 requirements."

Questions: During a visit to the Miller farm earlier this year with airport management, we were told that stones from a surviving chimney had been removed to a park in Kansas City. We wonder whether this action was justified in an MOA with SHPO's office and/or the FAA, since this action would necessarily alter the site's historical integrity? Has the airport adopted written plans for protecting the integrity or any surviving surficial or sub-surface cultural features?

The Miller farm has demonstrable historical and likely archaeological importance. It was the site of an archaeological investigation by African American archaeologist, Jimmy Johnson, in the 1990s. A report of this investigation is on file with the Missouri SHPO's office. This farm is also linked to an important historic personality, George Washington, an escaped African American slave who ultimately joined a black military unit which was the first to engage Confederate forces in the American Civil War. The history of this engagement is commemorated at the Battle of Island Mound, Bates County, Missouri.

Page 11: In a statement of findings and recommendations, Sturdevant recommends that the airport avoid adverse impact on these sites and, ideally, conduct phase-two archaeological testing of these properties to determine their state of preservation, historical significance and required protective measures.

Questions: Have any of these recommended protective measures been implemented by the airport, including recommended MOA and phase-two evaluations? If not, why not?

We have serious concerns that the Davis and Miller farm properties will meet the same unacceptable fate as the properties found register eligible in the 1987 report. The apparent failure of the airport to

account for the destruction of the properties reported in 1978, 1980 and 1987 (and other cultural resources investigations?) justifies this concern.

Questions: The airport is apparently leasing a significant part of the 12,000 to 14,000 acres under its management for agricultural production. The airport has also announced ambitious plans for developing these lands for various commercial uses. Some of these are currently under construction. Do these leases represent potentially adverse effects on historic properties for which the airport is responsible under Section 106? Have the holders of these leases been instructed to avoid adverse effects in area known to contain significant historical properties?

KCI: Failure to adopt a cultural resources management plan

In our view, the problems noted above all have a root cause: KCI has, to our knowledge, has never adopted a formal cultural resources management plan. The result is the chaotic, undocumented and resource-destructive pattern of behavior we describe above. We believe that protected historic resources will remain in danger until the airport is required to adopt such a plan. We emphasize that we are not raising these issues to impede airport operations or development. Rather, we believe that, like other federally regulated airports, KCI can harmonize resource protection with providing a vital service. It can do this by developing and implementing an adequate CRM plan. There are worthy models of such plans. We suggest, for example, looking at the cultural resources plans of airports like Los Angeles International Airport and other regulated agencies. If KCI wants to become a model air terminal for the 21st century, this would be an excellent beginning.

References Cited:

2008 Craig Sturdevant author, for Environmental Research Center of Missouri, Inc.
Cultural Resource Investigations, Phase I Survey, Kansas City International Airport, Platte County, Missouri. FAA project. Prepared for KCI Airport.

1987 Craig Sturdevant author, for Environmental Research Center of Missouri, Inc.
National Register Evaluation of Selected Structures, Kansas City International Airport, Platte County, Missouri (FAA). Prepared for Kansas City, Missouri.

Chris Babb

From: KCIEA Comments
Subject: FW: Comments on KCI Environmental Assessment
Attachments: Toni Prawl letter - MO SHPO- 12 12 16.pdf

From: Raab, L Mark
Sent: Friday, September 7, 2018 10:37 AM
To: katherine.andrus@faa.gov; Scott Tener
Cc: warren watkins; Bruce Watkins; Ike Francis; annmraab@gmail.com; Burke, Amanda; Prawl, Toni
Subject: SHPO correspondence re KCI Section 106

Dear Ms. Andrus,

Apologies if we seem over-zealous in our comments about the KCI EA. We know you have a heavy workload and we don't mean to impose on your good will. Still, it may be useful to understand some of the 'back story' involved in our correspondence with KCI over the last decade, and how that informs our comments on the EA.

As noted in our comments on the EA's Section 106 report, our involvement with the airport began with a 2008 court case. That case caused us to research the airport's record of Section 106 compliance over the years, and the results were not encouraging. We've had a number of conversations with the airport about this topic since 2008. By 2016, it was apparent that KCI was making a major push to build the new terminal complex. We expressed our concerns about what this might mean for the airport's Section 106 compliance, if the new airport were to be authorized. The attached letter to SHPO from December 2016 is a good summary of our concerns.

We pointed out in the letter that the airport's own archaeological consultant (Craig Sturdevant) confirmed that federally-protected properties identified in 1987 were destroyed under circumstances the airport has never explained. This destruction occurred before the current airport management but as we complained in the 2016 SHPO letter, the airport continued to ignore problems related to historic properties, perpetuating a long-standing problem of dubious airport accountability.

Fast forward to today. Problems we complained about in the 2016 letter continue; namely, a pattern in which the airport inexplicably "loses" or materially misrepresents information about documented airport archaeological resources. An astonishing example is the EA's Section 106 study. Two reports of significant archaeological findings were submitted in 2008 and 2009. References to these reports and their findings appear nowhere in the EA's Section 106 report. These reports were produced by the airport's archaeological consultant, Craig Sturdevant of the Environmental Research Center of Missouri. These documents include some the archaeological properties we expressed concern about in our 2016 letter. This is isn't a minor omission of obscure details. This is exclusion of materially relevant archaeological findings submitted to the airport, SHPO and FAA as part of previous Section 106 studies. P35

We know how it probably looks. We submit three sets of comments on the EA in such numbing detail that even our friends are wondering if we're maniacs. Maybe, but were the maniacs who have been trying for a decade to get the airport to start following the law and stop mysteriously "losing" and misrepresenting archaeological resources.

Mark Raab
For the Watkins Foundation,
Kansas City Missouri

Decades of Disappearing Archaeology:
KCIA Conflicts of Interest

9-8-18

Comments on KCIA Draft Environmental Assessment,
Watkins Foundation of Kansas City, Missouri

Kansas City International Airport (KCIA) has submitted a draft Environmental Assessment (EA) to get permission to build a new terminal: https://www.kci-edgemoor.com/documents/ We submitted earlier comments on the EA, detailing our concerns about environmental justice, cumulative environmental effects and the EA's Section 106 component. Here, we summarize these comments regarding KCIA conflicts of interest in past and present compliance with Federal historic preservation laws.

Decades of Disappearing Archaeology

The EA's Section 106 report is specifically tasked with reviewing previous airport archaeological studies and their significance (EA: 311-448). Amazingly, three previous airport archaeological studies are not referenced or discussed in the EA's current Section 106 report: ERCM 1987, 2008 and 2009 (referenced below). Consider the significance of these disappearing reports:

p36

ERCM 1987: Pages 19 and 27-33: The 1987 survey found that five (5) historic structures eligible for the National Register as exceptionally preserved examples of rural architecture. These findings were clearly communicated to the airport in the 1987 report, and the airport submitted this report, apparently without comment or revision, to the FAA for certification of compliance with Section 106.

ERCM 2008: Pages 57-58: One 19th century farm site (23PL1507-Miller farm) located at KCI was found Register eligible; a second farm (23PL1504- Davis farm) was found potentially Register eligible. Again, all clearly reported to the airport.

ERCM 2009: Intensive archaeological excavation of sites referenced in ERCM 2008 found exceptionally preserved mid-19th century slave-owning farms. African American descendants of slaves connected to these farms live in Kansas City, Missouri and trace their cultural heritage to these farms and related family cemeteries.

The absence of these reports in the EA is inexplicable. Or is it?

Decades of Compliance Problems

The three reports listed above reveal a disturbing compliance history:

ERCM 1987: The five Register-eligible sites found by this survey no longer exist and the airport has no record of how they disappeared. In a meeting with airport management in 2016, we directly asked for an explanation of what happened to these structures. The answer: We have no idea. Whatever happened was before our time. There are apparently no records. Other accounts of their fate do exist. Three local families have maintained historic cemeteries at the airport for decades. They regularly visit these cemeteries. These families (Rixey, Knighton, Miller) have lived in the area for 100 years or more (see comments on 2008 court case below, in which Rixey, Knighton and Miller families opposed the airport). These families have direct knowledge of the historic structures in question going back in time for many decades. Members of these families have reported to us that the structures referred to in the ERCM 1987 were burned to ground by unknown parties sometime after 1987, and the remaining debris scattered over a large area by heavy equipment or carried away. Potentially significant sub-surface archaeological deposits remain a possibility not addressed by any subsequent Section 106 study.

ERCM 2008: The 2008 report says this about the mysteriously missing structures:

"An evaluation of historic structures located on airport property was carried out in 1987 (ERCM 1987). Five of nine structures included in the evaluation were recommended eligible for NRHP listing. At the time of the present investigation, all of the structures evaluated had been razed. No records have been found regarding Section 106 compliance procedures prior or subsequent to the removal of the structures." (ERCM 2008: 22).

ERCM 2009: This report discusses three excavated archaeological sites (PL-1470, PL-1504, PL-1507) reported in ERCM 2008. These were found to have exceptionally preserved sub-subsurface architecture and extensive artifact deposits. Readers of the current Section 106 report would have no way of knowing that historic cemeteries exist at KCI containing the remains of people who lived on these archaeological sites and that that the airport lost a 2008 court case in which it sought permission to remove these graves. The airport was opposed in court by black and white descendants of the farms and cemeteries reported in ERCM 2009. The airport fails to mention that these archaeological sites, and the ERCM 2009 report, are the nexus of past and possible future legal actions.

The EA's Conflict of Interest

Follow this decades-long chain of compliance issues to the current EA. As noted above, the EA does not reference the reports above or their findings. Readers unfamiliar with the history of airport Section 106 compliance would not know about the previous studies or their materially important findings. The airport has a significant conflict of interest in reporting the Section 106 compliance outlined above. Reporting these studies risks the following disclosures:

- ERCM 1987- Undocumented destruction of Federally-protected historic sites.

- ERCM 2008- Documented finding of the airport's failure to report destruction of Federally-protected sites.

- ERCM 2009- Documented archaeological and historic links to African American and Euro-American descendants who have opposed past airport legal action. The descendants successfully opposed the airport's attempt to move historic graves associated with the farms reported in ERCM 2009 (Missouri Court of Appeals, Western District 2009). Reporting of ERCM 2009 could strengthen the position of the descendants in future attempts to move these cemeteries.

- Environmental Assessment (EA) For New Airport Terminal 2018- The pending EA effectively writes the airport's significant archaeological resources, and past compliance problems, out of existence.

For decades, airport Section 106 reports remained in airport filing cabinets, unknown to most. Along with these reports, the decades-long history of airport compliance failures remained largely invisible. As it appeared increasingly likely that KCIA would undertake construction of major new airport, we reported the problems above in a letter to Missouri SHPO in 2016, to no avail. The draft EA continues the problematic historic trend described above. This pattern now creates a significant conflict of interest for the airport. Should the airport fully disclose the history above and risk potentially adverse reactions from regulators and the public? Or would it be better to delete the above history from the EA and hope that nobody notices?

We believe that a full and fair accounting of the airport's management of cultural, historical and archaeological resources is overdue. By law and right, the EA is the proper occasion of such an accounting. We believe that the EA should be accepted until it includes this accounting. We also suggest that oversight of this accounting should not be left to the airport, but rather by independent regulatory authorities such as the Advisory Council on Historic Preservation and the Federal Aviation Administration. P37

References Cited

ERCM (Environmental Research Center of Missouri)
1987 National Register Evaluation of Selected Structures, Kansas City International Airport, Platte County, Missouri (FAA). Prepared for Kansas City, Missouri.

2008 Cultural Resource Investigations, Phase I Survey, Kansas City International Airport, Platte County, Missouri (FAA). Prepared by Environmental Research Center of Missouri (ERCM), Jefferson City, Missouri. Report on file, Kansas City International Airport.

ERCM

2009 Cultural Resources Investigations, 23PL1470, 23PL1504 & 23PL1507, Kansas City International Airport (FAA). Prepared by Environmental Research Center of Missouri (ERCM), Jefferson City, Missouri. Report on file, Kansas City International Airport.

Missouri Court of Appeals, Western District
2009 IN RE: The Matter of The REMOVAL OF HUMAN REMAINS FROM CEMETERIES IN KANSAS CITY, PLATTE COUNTY, Missouri. City of Kansas City, Missouri, Appellant, v. Unknown and Unrepresented Persons and Olin Miller, Respondents. No. WD 70006. Decided: November 10, 2009

Fix the Problem:
KCIA's On-Going Section 106 Compliance Failures

9-13-18
Comments on KCIA Draft Environmental Assessment
Watkins Foundation of Kansas City, Missouri

On-Going Compliance Failures

In earlier comments on KCIA's pending Environmental Assessment (EA), we documented the airport's on-going failures to properly comply with Section 106 of the National Historic Preservation (see Appendix 1 below). Briefly: A previous airport Section 106 study (ERCM 1987), reported five (5) historic archaeological properties potentially eligible for listing on the National Register of Historic Places. Before these sites could be evaluated for Register listing, they were razed under circumstances that remain unexplained. The airport had an affirmative obligation to protect these properties from adverse effects until Register eligibility could be determined and the disposition of these properties was lawfully carried out under terms of Section 106. A second Section 106 study in 2008 (ERCM 2008) reported that the airport had not concluded its Section 106 compliance obligations in relation to these properties. We reported to the airport and to Missouri SHPO in 2016 that Section 106 compliance remained an open issue in the matter of these properties. Below are photographs of the disappeared Register-eligible structures (ERCM 2008). These photos reveal why airport Section 106 compliance remains a problem. These were substantial structures with significant potential for subsurface archaeological remains, including architectural features and artifact deposits:



Photograph 12.
Structure # 17 (Elm Grove Church)



Photograph 10.
Structure # 10 (Frow House)



Photograph 11.
Structure # 11 (Frow House)



Photograph 7.
Structure # 3 (Lewis & Clark House)
Side with arched second floor sleeping porch.



Photograph 14.
Structure # 21 (E. Shepard House)
Side view.

The airport's current EA is the appropriate place to fix these on-going compliance failures for several reasons:

•The EA is specifically tasked with assessing past airport Section 106 efforts and assessing their significance to the current effort. The EA's current Section 106 study should disclose past compliance failures when evidence of such failures is manifest and make recommendations for mitigating these failures. P38

• Although the five above-ground structures noted above have reportedly been destroyed without Section 106 documentation, the possibility that significant archaeological resources survive below ground has not been assessed, as far as we are aware. A third Section 106 study conducted by the airport, excavations reported in 2009 (ERCM 2009), shows that historic structures like those noted in 2008 (ERCM 2008) may be associated with exceptionally preserved and scientifically and cultural significant below ground archaeological deposits. Until such an assessment is carried out, significant archaeological resources may be at risk. On-going airport land use, including alterations to the landscape from agriculture and related activities and aviation related constructions, remain risk factors. P39

•The EA is a reasonable and appropriate context for concluding the airport's Section 106 obligations in the matter of these Register-eligible properties. P40

Fix the Problem

The EA's current Section 106 study should include a Memorandum of Agreement (MOA) between the airport, Missouri SHPO and the FAA to do the following:

• Report, to the extent practical, the conditions under which the five historic archaeological properties were destroyed.

• Obtain SHPO recommendations for sub-surface archaeological testing of the five historic properties shown above and execute an MOA for carrying such testing. P41

We believe the pending Section 106 study should not be accepted until a plan to fix these long-standing compliance failures is in place.

Appendix 1:

Decades of Disappearing Archaeology:
KCIA Conflicts of Interest

9-8-18

Comments on KCIA Draft Environmental Assessment
Watkins Foundation of Kansas City, Missouri

Kansas City International Airport (KCIA) has submitted a draft Environmental Assessment (EA) to get permission to build a new terminal: https://www.kci-edgemoor.com/documents/ . We submitted earlier comments on the EA, detailing our concerns about environmental justice, cumulative environmental effects and the EA's Section 106 component. Here, we summarize these comments regarding KCIA conflicts of interest in past and present compliance with Federal historic preservation laws.

Decades of Disappearing Archaeology

The EA's Section 106 report is specifically tasked with reviewing previous airport archaeological studies and their significance (EA: 311-448). Amazingly, three previous airport archaeological studies are not referenced or discussed in the EA's current Section 106 report: ERCM 1987, 2008 and 2009 (referenced below). Consider the significance of these disappearing reports:

ERCM 1987: Pages 19 and 27-33: The 1987 survey found that five (5) historic structures eligible for the National Register as exceptionally preserved examples of rural architecture. These findings were clearly communicated to the airport in the 1987 report, and the airport submitted this report, apparently without comment or revision, to the FAA for certification of compliance with Section 106.

ERCM 2008: Pages 57-58: One 19th century farm site (23PL1507-Miller farm) located at KCI was found Register eligible; a second farm (23PL1504- Davis farm) was found potentially Register eligible. Again, all clearly reported to the airport.

ERCM 2009: Intensive archaeological excavation of sites referenced in ERCM 2008 found exceptionally preserved mid-19th century slave-owning farms. African American descendants of slaves connected to these farms live in Kansas City, Missouri and trace their cultural heritage to these farms and related family cemeteries.

The absence of these reports in the EA is inexplicable. Or is it?

Decades of Compliance Problems

The three reports listed above reveal a disturbing compliance history:

ERCM 1987: The five Register-eligible sites found by this survey no longer exist and the airport has no record of how they disappeared. In a meeting with airport management in 2016, we directly asked for an explanation of what happened to these structures. The answer: We have no idea. Whatever happened was before our time. There are apparently no records. Other accounts of their fate do exist. Three local families have maintained historic cemeteries at the airport for decades. They regularly visit these cemeteries. These families (Rixey, Knighton, Miller) have lived in the area for 100 years or more (see comments on 2008 court case below, in which Rixey, Knighton and Miller families opposed the airport). These families have direct knowledge of the historic structures in question going back in time for many decades. Members of these families have reported to us that the structures referred to in the ERCM 1987 were burned to ground by unknown parties sometime after 1987, and the remaining debris scattered over a large area by heavy equipment or carried away. Potentially significant subsurface archaeological deposits remain a possibility not addressed by any subsequent Section 106 study.

ERCM 2008: The 2008 report says this about the mysteriously missing structures:

"An evaluation of historic structures located on airport property was carried out in 1987 (ERCM 1987). Five of nine structures included in the evaluation were recommended eligible for NRHP listing. At the time of the present investigation, all of the structures evaluated had been razed. No records have been found regarding Section 106 compliance procedures prior or subsequent to the removal of the structures." (ERCM 2008: 22).

ERCM 2009: This report discusses three excavated archaeological sites (PL-1470, PL1504, PL-1507) reported in ERCM 2008. These were found to have exceptionally preserved sub-subsurface architecture and extensive artifact deposits. Readers of the current Section 106 report would have no way of knowing that historic cemeteries exist at KCI containing the remains of people who lived on these archaeological sites and that that the airport lost a 2008 court case in which it sought permission to remove these graves. The airport was opposed in court by black and white descendants of the farms and cemeteries reported in ERCM 2009. The airport fails to mention that these archaeological sites, and the ERCM 2009 report, are the nexus of past and possible future legal actions.

The EA's Conflict of Interest

Follow this decades-long chain of compliance issues to the current EA. As noted above, the EA does not reference the reports above or their findings. Readers unfamiliar with the history of airport Section 106 compliance would not know about the previous studies or their materially important findings. The airport has a significant conflict of interest in

reporting the Section 106 compliance outlined above. Reporting these studies risks the following disclosures:

• **ERCM 1987**- Undocumented destruction of Federally-protected historic sites.

• **ERCM 2008**- Documented finding of the airport's failure to report destruction of Federally-protected sites.

•**ERCM 2009**- Documented archaeological and historic links to African American and Euro-American descendants who have opposed past airport legal action. The descendants successfully opposed the airport's attempt to move historic graves associated with the farms reported in ERCM 2009 (Missouri Court of Appeals, Western District 2009). Reporting of ERCM 2009 could strengthen the position of the descendants in future attempts to move these cemeteries.

•**Environmental Assessment (EA) For New Airport Terminal 2018**- The pending EA effectively writes the airport's significant archaeological resources, and past compliance problems, out of existence.

For decades, airport Section 106 reports remained in airport filing cabinets, unknown to most. Along with these reports, the decades-long history of airport compliance failures remained largely invisible. As it appeared increasingly likely that KCIA would undertake construction of major new airport, we reported the problems above in a letter to Missouri SHPO in 2016, to no avail. The draft EA continues the problematic historic trend described above. This pattern now creates a significant conflict of interest for the airport. Should the airport fully disclose the history above and risk potentially adverse reactions from regulators and the public? Or would it be better to delete the above history from the EA and hope that nobody notices?

We believe that a full and fair accounting of the airport's management of cultural, historical and archaeological resources is overdue. By law and right, the EA is the proper occasion of such an accounting. We believe that the EA should not be accepted until it includes this accounting. We also suggest that oversight of this accounting should not be left to the airport, but rather by independent regulatory authorities such as the Advisory Council on Historic Preservation and the Federal Aviation Administration. References Cited ERCM (Environmental Research Center of Missouri) 1987 National Register Evaluation of Selected Structures, Kansas City International Airport, Platte County, Missouri (FAA). Prepared for Kansas City, Missouri.

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Chris Babb

Subject: FW: Environmental Assessment at KCI for Single Terminal
Attachments: KCI Route Map.png; KCI RENOVATION PLAN - ALT 30 OCT 2017.pdf

From: Charles Cammack <cammackgeo@gmail.com>
Sent: Friday, September 14, 2018 8:12 AM
To: Madison, Todd (FAA) <todd.madison@faa.gov>; Pat Klein <Pat.Klein@kcmo.org>; cfrg123@gmail.com; Micheal Mahoney <mmahoney@hearst.com>; Dave Helling <dhelling@kcstar.com>; cat.reid@kshb.com; Mayor <mayor@kcmo.org>
Subject: Environmental Assessment at KCI for Single Terminal

Hello Mr. Madison, Mr. Klein, Mayor James, et al,

The draft Environmental Assessment and Section 106 Evaluation has been presented to the public for comment. Here are a few of my comments:

Exhibit 2.3 shows two possible renovation plans for KCI. The upper half of the exhibit shows existing parking garages out of place and incorrectly sized. The plan is unfeasible as the processing building would extend into the existing parking garage.

The plan shown in the lower half of that exhibit is also flawed in that the garages are not shown in the correct form (and possibly position). Parking garages A and B have post-tensioned decks, so it is not possible to adjust the shape of the garages (personal report from the engineer of record). Since the single processor is located between Terminals A and B, huge physical changes result that are detrimental. Walking distances become too great, and moving walkways must be linear. p42

A properly prepared EA would be based upon the best renovation plan, not the worst. Crawford Architects prepared a plan that was presented to the public in 2016. However, Crawford's plan is not feasible either because it called for trimming of the corners of the garages. My ALT 30 plan is feasible and practical. A properly prepared EA would include consideration of the best renovation plan (ALT 30), which is attached. p43

Landrum and Brown, authors of the EA, are probably unaware of the existence of my ALT 30 plan, and they probably based their analysis on the information given to them by KCMO, KCAD, and Edgemoor. Mr. Klein received six renovation plans from 3rd parties (verbal comment), but did not disclose any of them to the public so as to "not confuse the public". My ALT 30 plan was not disclosed to the public.

I served as the geotechnical engineer of record for remediation of KCMO's construction debris landfill located on KCMO's riverfront. The debris included broken, lightly reinforced slabs and heavily reinforced columns and beams. All debris was passed through a crusher to make it useful as structural fill, so air quality was a constant problem. We had the advantage that the structural members that needed to be

reduced in size before being transported to the crusher could be broken down further using the ground as an anvil.

At KCI, the heavily reinforced concrete beams and columns are elevated and do not rest on an anvil. Breaking down intact, heavily reinforced, interconnected structural members will be much more difficult than breaking up lightly reinforced pavement slabs resting on the ground. Air quality concerns at KCI will include the aircraft engines. p44

I believe that the demolition work can be done without causing mishaps involving aircraft, but the work will not be simple or straight forward. Numerous precautions will be required to complete the work satisfactorily and without incident. The greatest concern might be light-weight pieces that might become airborne and strike aircraft or reach the area where aircraft operate. If there were no other way, I would support demolition of Terminal A and its parking garage. But there is another way - ALT 30. There is absolutely no need to demolish these structures or to put passengers at greater risk (please review my previous email messages concerning safety and security).

Edgemoor's plan places a new parking garage over the existing International Circle, the roadway that connects drivers to Terminals A, B and C. Traffic must be re-routed during construction. The plan shown in the latest progress report to City Council appears to show a convoluted route involving two-way traffic and two roundabouts that operate in series (see attached Phase 2 plan). I consider this plan, though brilliant, to be unfeasible because the difficulty of the problem given to the traffic engineers is too great. Traffic congestion, traffic accidents, missed flights, increased passenger waiting time, reduced airport revenue, and road rage incidents will likely occur. if the FAA approves demolition of Terminal A and its parking garage before a sound traffic plan is created, then disaster may result. I believe that it is impossible to build the single terminal at KCI without spending huge sums of money on temporary roadways and without negatively impacting the public's safety and convenience.

Edgemoor's plan and any alternative used in the EA should be confirmed to be feasible by a credible, unbiased source. Due to the traffic problem cited above, I don't consider Edgemoor's plan to be feasible - that is, they can't build it without putting the health and safety of drivers and passengers at risk. If the selected source finds that ALT 30 is feasible, KCMO can solicit other 3rd party renovation plans, then choose the best. With renovation, there will be little impact on airside safety, and the EA, if needed, will not be contentious. p45

Please direct KCMO and Edgemoor to revise their EA for the single terminal by:

- Obtaining critical reviews of the plans, including my ALT 30 plan, from a credible, unbiased source
- Base the EA, in part, on the best renovation plan, ALT 30

p46

Thank you for considering my information.

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KCI RENOVATION PLAN – ALT 30

By Charles Cammack

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(Revised February 27, June 13, 2017, and October 9, 2017)

KCI RENOVATION PLAN – ALT 30

Content

1. INTRODUCTION 1
2. BASIC DESIGN 1
3. MAJOR REVISIONS 2
4. PROCESSING AND HOLDING AREAS 2
5. NEW CIRCULATION TOWERS AND REALIGNED ROADWAY 3
6. TUNNELS 3
7. TERMINAL EXTENSIONS 4
8. TAO COUNTERS 4
9. TSA CHECKPOINTS 5
10. EXIT LANES AND ONE-WAY REVOLVING DOORS 5
11. RESTROOMS 5
12. BAGGAGE HANDLING – ARRIVING PASSENGERS 6
13. BAGGAGE HANDLING – DEPARTING PASSENGERS 6
14. RESTAURANTS 7
15. LINK WALKWAY DIMENSIONS 7
16. GATES 7
17. TERMINAL TO TERMINAL PASSENGER TRANSFER 8
18. AIRSIDE IMPROVEMENTS 9
19. FOURTH LEVEL OF PARKING 9
20. ADA ACCESS FOR EMPLOYEE PARKING 10
21. COSTS 10
22. SUMMARY 13

Table 1. Current and Required Areas for KCI Functions

Drawing 30-1 3D View
Drawing 30-2 Realigned Roadway, Link, Two Terminal Extensions, and Processing Areas
Drawing 30-3 Hatching and Symbol Legend
Drawing 30-4 Realigned Roadway, Link, Two Terminal Extensions, and Processing Areas
Drawing 30-5 Realigned Roadway, Link, Two Terminal Extensions, and Processing Areas
Drawing 30-6 North End to Terminal Center, Holding and Processing Areas
Drawing 30-7 Center of Terminal, Holding and Processing Areas
Drawing 30-8 Center to South End, Holding and Processing Areas
Drawing 30-9 Tunnel 2 / Terminal Connector
Drawing 30-10 Terminal Transfer Tunnels
Drawing 30-11 Taxiway Realignment

Appendix A Parking Garages A and B

KCI RENOVATION PLAN – ALT 30

By Charles Cammack
(Revised October 2017)

1. INTRODUCTION

Kansas City Missouri is considering renovating KCI's terminals and parking garages A and B or replacing them with a new single terminal and parking garage. Kansas City's Aviation Committee considered twenty-seven renovation alternatives in some detail before concluding that replacement rather than renovation was the best way forward. The new, $1B± Single Terminal Plan (STP) currently lacks sufficient voter support for the required bond issue. Charles Cammack previously submitted renovation alternatives 28, 29, and 30 to the Aviation Committee. This submittal includes numerous improvements to ALT 30.

ALT 30 puts passenger processing in the proper order, salvages costly elements of KCI, meets essential design objectives, and maintains high levels of convenience. The objective of this submittal is to demonstrate that ALT 30 is a feasible and practical renovation plan that is worthy of serious consideration by Kansas City's Aviation Committee, its Aviation Department, and the airlines. ALT 30 has merit and should be studied, evaluated, and supported by these parties. A competitive evaluation of appropriately developed ALT 30 and STP plans will lead to selection of the best plan, approval of the required bond issue, and renovation or replacement of KCI.

2. BASIC DESIGN

Renovation of KCI will only be successful if its original functionality is restored. Abandonment of KCI's strict circular roadway alignment permits construction of two terminal extensions and a link structure between them as shown on Drawing 30-1, 3D View. Passenger processing will take place in the proper order within these two terminal extensions and at the ends of Terminal A. ALT 30 permits construction of one large, wide holding area in Terminal A and provides additional passenger processing area in two terminal extensions. TAO counters and baggage carousels located near the center of Terminal A will be relocated to the two non-sterile terminal extensions. Tunnel 2 will be completely replaced and its upper end will be in a terminal extension. Many existing facilities such as restaurants, restrooms, baggage carousels, baggage conveyors and some TAO counters will continue to serve in the renovated KCI at their current locations.

Kansas City's Aviation Department issued a document on 21 July 2015 entitled *KCI Development Program Process Update* to the Mayor and City Council. Page 15 of that document included a table entitled *Existing Space / Terminal Requirements* that listed the space currently allocated to various functions in Terminals B and C as well as the required space in a new or two renovated terminals. That same information is listed in Table 1 along with the space provided to some of those functions in renovated Terminals A and B under ALT 30. Reference is made to those values in this submittal.

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3. MAJOR REVISIONS

The 2016 version of ALT 30 called for the entire existing terminal to be sterile (a holding area) and for construction of two non-sterile terminal extensions (processing area). This 2017 version of ALT 30 divides Terminal A into holding and processing areas and includes a link structure between the two terminal extensions. Ten existing restrooms, six TAO counters, two baggage carousels, and numerous baggage conveyors in Terminal A will continue to serve their original purpose in their current locations although they will probably require maintenance, remodeling, or technical upgrading. Two new pallet loop conveyors will replace the two baggage carousels located near the center of Terminal A. Terminal extensions will include new TAO counters, restrooms, and TSA checkpoints.

4. PROCESSING AND HOLDING AREAS

Drawing 30-2 shows a non-circular roadway alignment, holding and processing areas within Terminal A, two terminal extensions, and the link between the two extensions overlayed on an architectural drawing of Terminal A prepared by HNTB. Holding, processing, link, and terminal extension areas are denoted using various hatching symbols. Drawing 30-3 shows a legend that identifies shading and component symbols used on all drawings.

Drawing 30-4 shows the same shading but without the architectural drawing. Nearly all space within Terminal A between tunnels 1 and 3 will be one large holding area having a width of about 58 feet. No glass partitions will remain between the current façade and the outer wall. Terminal A will be fully open between the façade and the outer wall. Passengers in the holding area can reach two large existing restaurant areas or six existing restrooms without leaving the holding room.

Both ends of Terminal A will remain processing areas and will retain their baggage carousels (not shown on drawings 30-2 and 30-4). Passengers in processing areas at both ends of Terminal A will have quick access to two TAO counters, two TSA checkpoints, four restrooms, two baggage carousels, and curbs. Holding and processing areas in renovated Terminal A will be spacious and comfortable.

Oval rings shown on Drawings 30-2 and 30-4 identify two short transition areas within Terminal A that will contain both holding and processing areas. Gates opposite transition areas will service commuter aircraft. Holding area widths in transition areas will be less compared to those between tunnels 1 and 3, but will be adequate for commuter aircraft operations.

Passengers in terminal extensions will have access to four new restrooms, four TAO counters, two TSA checkpoints, and two pallet loop conveyors. Passengers can also reach processing areas in each end of Terminal A without going outside using the link and passageways in transition areas.

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5. NEW CIRCULATION TOWERS AND REALIGNED ROADWAY

Three square circulation towers at parking garage corners will be demolished. Three appropriately sized hexagonal-shaped circulation towers will be constructed in their place permitting realignment of the roadway and creating space for two terminal extensions joined by a link structure. Plan dimensions of circulation towers can be much larger than shown below the roadway level. Modest increases in plan dimensions can be made above the roadway level without compromising the design.

A 1,300-foot long retaining wall will be constructed between Terminal A and its parking garage that will support earth and the realigned roadway. The leaking storm sewer lines that plague the terminals now will be abandoned and filled with grout. New water service lines and storm sewers composed of high-quality materials will be located below the roadway. Sand will not be used as backfill. Existing storm sewers and water lines will be abandoned in place and filled. Sanitary sewers are located below the apron and should not be affected by the renovation.

Seepage of water into Terminal A should be greatly reduced or eliminated without having to do major repairs except at the ends of Terminal A because terminal extensions and the link will move surface water away from the terminals. It may be necessary to expose the foundation wall of Terminal A between the ends of the terminal and the terminal extensions so that waterproofing can be applied to the exposed walls. In addition, it might be necessary to perform maintenance on existing foundation drainage systems.

The roadway will include six 12-foot wide traffic lanes, a 12-foot wide island, and a 12-foot+ wide sidewalk. Island width opposite the link will be reduced to a minimum of about 7 feet to permit the link to have a minimum width of about 23 feet. Roadway radii will be small opposite the link, so parking adjacent to the link will be prohibited to improve safety.

Circulation towers must include new staircases and elevators because of the new footprint. New elevators may extend to a new, fourth level of parking. Final design of circulation towers must take into account ADA regulations for staircases, doorways, and elevator design. Sufficient space is available to design circulation towers that meet all of those requirements. Bridges between the roadway and circulations towers will not be provided.

6. TUNNELS

Portions of existing tunnels near parking garages are actually located above ground and are not true tunnels. Renovation will require that virtually the entire tunnel structure be below grade, water tight, and capable of supporting earth loads. A portion or all of existing tunnels will be replaced with true tunnels. If all new tunnels are built, then alternative alignments can be considered.

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The top ends of tunnels 1 and 3 will be located within processing areas and should need no structural modification. The lower ends must be replaced with true tunnel sections that join with new circulation towers.

The top end of tunnel 2 must be demolished and a new top end must be constructed in the terminal expansion, a processing area. The lower end must also be rebuilt to form a connection with the new circulation tower. Since both the upper and lower ends of tunnel 2 must be rebuilt, it becomes beneficial to build a totally new tunnel 2 having its upper end in the terminal extension as shown on Drawings 30-5 through 30-9. Tunnel 2 might be lengthened so that it has an upper end in both terminal extensions. The circulation tower would then connect to the middle of tunnel 2. This design component minimizes the impact of tunnel 2 on terminal extensions.

7. TERMINAL EXTENSIONS

Two terminal extensions must be constructed adjacent to Terminal A's façade. Each terminal extension will have a maximum width of about 62 feet, a length of about 560 feet, and an area of about 27,000 sq. ft. A link structure having a minimum width of about 23 feet will form a connecting passageway between the two terminal extensions. The two extensions and link will appear to be one continuous structure from the roadway. The roof might curve upward near the center of each extension and curve downward over the link and the outer ends of the extensions. Modern architecture seems to delight in such approaches. In this case, a less costly and less dramatic approach might be better. For example, the projecting canopy might be removed and the terminal extension roof might join Terminal A below, with, or above the remaining section of canopy. The goal of this approach is to maintain light entry into the holding area through existing sloping windows in the terminals. This approach is shown schematically in Drawing 1, 3D View. Detailed studies must be completed before the best connection can be designed.

Floor slabs in terminal extensions will be supported by existing structural fill. The same foundations used to support the parking garages will probably be used to support terminal extension structural loads. Terminal extensions and the link will extend over the existing mechanical room in Terminal A. If basement space is created below the floors in terminal extensions, then horizontal connections to the mechanical room can be created. Vertical connections to mechanical space can also be created by removing a portion of the ceiling (sidewalk) of Terminal A. This provides opportunities to create simple baggage conveyor alignments and connections.

8. TAO COUNTERS

Terminal A has six TAO counters now, but will have seven TAO counters under ALT 30. Some existing TAO counters do not have convenient access to baggage conveyors, so some passengers must manually transport their bags to a nearby baggage collection point after checking their bags at the TAO counters. New baggage conveyors will be constructed at TAO counters that presently lack that equipment.

Four existing TAO counters are located midway between the façade and outer wall, or about in the middle of the future holding area. Four of these TAO counters will be removed, and new TAO counters will be constructed in line with the façade and over existing Skycap locations. Baggage checked at those TAO counters will travel to the apron on existing baggage conveyors. Existing baggage conveyors will provide service to some new TAO counters.

Two existing TAO counters are located in transition areas and are properly positioned to function under ALT 30. However, new baggage conveyors will be required to provide service. One existing TAO counter is properly positioned and has convenient access to a baggage conveyor.

9. TSA CHECKPOINTS

Four new TSA checkpoints will be constructed that conform to TSA design guidelines at the boundary between holding and processing areas. Two designs may be used:

Type	Name	Length and Width
A	2-to-1 Design with Holding Station	46'-4" by 22'-10"
B	2-to-1 Design with Holding/Wanding Stations	43'-8" by 25'-4"

Each checkpoint will have two baggage x-ray machines and one walk-through metal detector (WTMD). Checkpoints can be oriented perpendicular to or parallel to the façade depending on other space requirements and conditions. Type A checkpoints are most suitable when aligned parallel to the façade. Type B checkpoints are most suitable when aligned perpendicular to the façade. Each checkpoint will have queuing and re-composure areas. Open spaces for these elements are shown in the drawings, but boundary lines are not shown to reduce clutter on the drawings.

10. EXIT LANES AND ONE-WAY REVOLVING DOORS

Four exit lanes will permit arriving passengers to move freely and quickly from the holding area into processing areas where they can pick up their bags from carousels or reach ground transportation. Exit lanes will be manned when open, but will only be open when large numbers of passengers are arriving at nearby gates. Arriving passengers can also exit through one-way revolving doors to reach processing areas at any time. One-way revolving doors will permit arriving passengers to exit the holding area but will prevent anyone from entering the holding area. Including revolving doors in ALT 30 greatly reduces TSA labor requirements.

11. RESTROOMS

KCI presently has ten restrooms located adjacent to the façade. Four of these restrooms will be within processing areas and six will be within the holding area after renovation. These ten restrooms are well positioned to serve the renovated Terminal A. All existing restrooms must be renovated by installing new lighting and restroom fixtures. Restrooms might need to be expanded to provide desired levels of convenience or to meet more stringent ADA requirements. This can

be done during a major renovation of the terminals because passageway widths no longer limit restroom size. If more space is required, the back walls can be moved towards the roadway and the front walls can be moved towards the aprons. However, the need for these changes is not yet known.

Four new restrooms will be constructed within two terminal extensions. Total restroom space will increase by about 40 percent. Table 1 indicates that 11,200 square feet of restroom space will be required in the holding rooms of renovated Terminals A and B. ALT 30 will provide approximately that amount of restroom space (11,072 sq. ft.) in the two holding areas with no increase in individual restroom space. Some new restrooms have been constructed in current holding rooms. If these restrooms can continue to serve, then even more restroom space will be available in the holding area.

Table 1 does not list the amount of restroom space needed in processing areas, but the space provided is about equal to the restroom space provided in the holding areas. Thus, ALT 30 will likely provide sufficient restroom space.

12. BAGGAGE HANDLING – ARRIVING PASSENGERS

Bags from arriving planes can simply be unloaded from aircraft, then placed on conveyors that extend to baggage carousels at the Passenger Service Level (PSL). The two baggage carousels at the ends of Terminal A should require no significant modification other than replacement of worn parts. However, existing equipment should serve very well after maintenance has been performed and high-wear components have been replaced.

The two baggage carousels located near the center of the terminal must be removed because this location will be within the holding area. Two new pallet loop conveyors must be installed at the juncture of the existing terminal and each terminal extension as shown on Drawings 30-5 through 30-9. Each pallet loop conveyor will be constructed around two existing columns or adjacent to two columns. New baggage conveyors must extend from the apron level to the pallet loop conveyor at the PSL. A small amount of space within the existing terminal will be enclosed and removed from the holding areas.

13. BAGGAGE HANDLING – DEPARTING PASSENGERS

Baggage screening is presently performed in two buildings located on the apron and attached to Terminal A. Each building includes two baggage-screening machines. The existing baggage handling and screening system suffers from the fact that many bags must be transferred by cart to the baggage screening buildings. In addition, each building occupies a PBB at Terminal A.

Two baggage carousels located near the center of Terminal A must be relocated to terminal extensions as previously discussed. The move will vacate space at the PSL that will become part of the holding area.

Baggage screening machines will occupy the space at the apron level created by removal of the baggage conveyors. One baggage screening building will be demolished making it possible to add one or more gates to Terminal A.

New conveyors can be installed that extend from TAO counters to baggage screening machines. Existing conveyors that extend from skycap stations can be included in that system. It is important that each TAO counter be connected to baggage conveyors so that passengers can drop their bags at TAO counters rather than having to move them to a separate bag drop-off point.

Departing passengers will check their bags at TAO counters or new skycap stations in terminal extensions. New baggage conveyors must be constructed below terminal extension floors to service new Skycap stations.

14. RESTAURANTS

Two existing two-level restaurant spaces are located in the planned holding area in Terminal A. Patrons in the second level restaurants can look out on the apron and runways through windows in the outer wall of Terminal A. All passengers in the holding area will be able to visit these restaurants. ALT 30 preserves these restaurant spaces greatly reducing the cost of renovation. Certainly new equipment and furnishings will be required, but the cost of renovation will still be small compared to the STP.

15. LINK WALKWAY DIMENSIONS

ALT 30 provides wide-open spaces throughout much of the terminal, but walkway widths become relatively narrow, about 23 feet, in the transition area between the center and ends of the existing terminal. These walkways widths are adequate, however, because passengers will tend to walk only towards the ends of the terminal and the baggage carousels. The TAO counter located east of tunnel 1 will be demolished, and a new TAO counter will be constructed farther east. Departing passengers that need to check bags at the new TAO counter will not need to use the walkway except to reach the nearest restrooms. Few passengers will walk from terminal ends to terminal extensions.

16. GATES

KCMO's Aviation Department has published two maps of Terminal A that show 15 and 21 gates. PBBs bracket the two restaurant spaces, and no PBBs can be added between those bracketing PBBs. The two gates (PBBs) at the north end of Terminal A fall in non-sterile processing space under ALT 30, so they cannot be used. It may be possible to locate the TAO counter a little closer to the end of the terminal and to extend the holding area past one of the PBBs. This would add one more PBB to the count. Not counting this additional PBB, Terminal A has 16 useable PBB locations now. It appears that new gates can be added in two intervals that have no PBBs. Taking this information into account, Terminal A can support 18 gates after renovation.

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Terminal B has 16 PBBs at this time based on the latest Google Earth photo. It appears that Terminal B has bag screening buildings that are wider than those present at Terminal A, but the buildings do not attach to existing gates. Nevertheless, the wide buildings prevent installation of PBBs at those locations. It also appears that no PBBs are located where Terminal B was expanded to enlarge the Southwest Airlines holding area (Gerbil tube). Under ALT 30, holding area will increase and the space adjacent to the Gerbil tube will become holding area. The Gerbil tube need not function as a corridor after ALT 30. If the Gerbil tube area is incorporated into the holding area, two additional gates can be added in that area bringing Terminal B's gate count to 18. Total gate count between Terminal A and B will be 36 whereas Table 1 lists 35 as the required number of gates. ALT 30 has the potential to exceed the gate requirement listed in Table 1 by one gate.

17. TERMINAL TO TERMINAL PASSENGER TRANSFER

ALT 30 calls for transfer of sterile passengers between terminals using special vehicles operating on the aprons that dock with existing passenger boarding bridges (PBBs). In particular, some existing PBBs located near the ends of Terminal A will connect to processing rather than holding areas under ALT 30. Use of these PBBs would not interfere with gates that connect with the holding area. This system will allow sterile passengers to move to other terminals without leaving sterile space, being exposed to the elements, and without changing levels. The required technology is largely available and includes:

- Precise vehicle location, speed, and orientation systems
- Four-wheel steering and four wheel-drive
- Wheel-mounted electric motors
- Collision avoidance systems

We need computer monitoring and control systems that will allow these vehicles to operate safely on the aprons without affecting aircraft or their operations. KCI is not the only airport having multiple terminals that would benefit from such a system.

Farmers operate combines in large fields with location accuracy in the range of a few inches. NASA has demonstrated all-wheel steering and all-wheel drive vehicles having electric motors in their wheels that can move laterally in any direction or simply rotate about a point. Production automobiles detect obstructions and brake automatically to avoid collisions. Surely, the design and construction of such a system is feasible and practical. This system could be used even with the existing KCI and at any airport in the world.

If airside transfer of passengers among terminals is not permitted, then passengers can move between terminals using special vehicles operating on the landside. Drawing 30-10 shows two new tunnels that might extend from the holding area to docking stations located on the second level of the parking garage. Two new elevators will carry sterile passengers down two levels to the parking garage level 1. Tunnels will extend to the parking garage and begin to rise after passing beneath the new storm sewer line. The tunnels will meet the second level of the parking garage and extend out to a docking station located about mid-way between circulation towers.

Special vehicles driven by TSA agents will pick up sterile passengers, then transport them to another docking station in another garage. The agent maintains secure operations just as TSA agents secure exit lanes.

This on-demand transfer system would require construction of two new elevators and two new tunnels in Terminal A, and two docking stations in the parking garage. In addition, special vehicles capable of transporting disabled passengers will be required. Although this system is somewhat cumbersome, it is feasible and is much better than current service.

Alternatively, terminal extensions can be constructed on the airside of the existing terminals that extend secure space to the very ends of the terminals. Special shuttle vehicles will pick up sterile passengers at the terminal ends and transport them to another terminal. Passengers will not change levels while walking or be exposed to the elements, and will always remain within sterile space.

18. AIRSIDE IMPROVEMENTS

Alt 30 calls for realignment of taxiways at KCI so that longer aircraft can dock at PBBs and yet not have their empennages extend into taxiways. ALT 30 abandons circular taxiway alignments and moves the alignments farther from terminals in certain key areas. Not all aircraft will be longer than those operating now from KCI. Drawing 30-11 shows the realigned taxiway near Terminal A.

De-icing fluid collection systems can be installed at the same time that taxiways are realigned. Collection of these liquids with minimal runoff will reduce the total volume of liquid that must be processed. Completing both programs in one construction project will reduce the total cost of the program.

Other improvements to airside components can be completed in conjunction with the taxiway realignment. For example, fuel hydrant systems might need replacement or improvement. This work done concurrently with taxiway realignment will be much less expensive and disruptive compared to work done after renovation is complete.

19. FOURTH LEVEL OF PARKING

It is likely that a fourth level of parking can be added to the parking garages in Terminals A and B as explained in Appendix B. The cost of adding a fourth level of parking is relatively small compared to a new garage because no property must be purchased, there are no site preparation costs, and no foundations must be constructed. It may be necessary to install shear walls inside the parking garage to meet current seismic design standards. Alternatively, viscous dampers might be installed between garage corners and new retaining walls. This approach would not reduce parking efficiency and be less costly than constructing shear walls.

A fourth level of parking will increase revenues that will pay for much of the renovation cost. New elevators are required, but new elevators are an essential part of the ALT 30 renovation of

KCI. This fourth level of parking would not extend above the roof of Terminal A and would therefore not interfere with tower control over aircraft on the apron.

20. ADA ACCESS FOR EMPLOYEE PARKING

Employee parking lots are located at each end of all terminals. Employees can walk from employee parking lots into the terminal apron level, then walk up two flights of stairs to the passenger service level. Some employees may be unable to walk up those stairs.

Alternatively, employees can walk from parking lots up 128± foot long, 15±foot high ramps to reach the passenger service level in each terminal. Ramp length and steepness exceed permitted ADA values. Even if ramps could be lengthened, they would still not be suitable for employees needing to use wheel chairs because employees would be exposed to the elements for too long a time. For the same reason, installation of an elevator and reducing the slope height would not be suitable because distances between parking lots and doorways are too great. A different approach is needed that considers the comfort and safety of employees that park in those lots.

Some parking spaces are marked for people that live and work though stricken with some disability. These spaces should be covered so that the employees can exit their vehicles without getting soaked with rain while transferring from their cars to wheel chairs. These covered parking spots should be located on either side of a shuttle station so that employees do not need to leave shelter to reach a shuttle.

The upper ends of ramps are contiguous with sidewalks in front of the façade. Ramps can be widened to accommodate automobiles or small shuttle vehicles. If a curb cut is made, then these shuttles can drive up the ramp, stop to let employees disembark, then drive out to the roadway.

Shuttle vehicles will be useful to all employees and will operate on an on-demand basis. Employees will summon shuttles using a cell phone app. Shuttles will pick employees up at shuttle stations in the parking lot or at the ends of terminals. One shuttle might serve all employee parking lots.

Unmanned autonomous shuttles constrained to operate between just two points might also serve this need. Magnetic inserts installed in the pavement could make shuttles follow fixed alignments. This system would provide comfort to all employees and allow enlargement of the parking lot to serve more employees.

21. COSTS

ALT 30 adds about 60,000 square feet of additional space to Terminals A and B. The cost of just the terminal expansions and link at Terminals A and B will be about $120M at a unit rate of $1,000 per square foot. Few structural changes inside Terminal A will be required, and many existing facilities including restrooms, restaurants, TAO counters, two baggage carousels, and several baggage conveyors will continue to serve KCI, although technical upgrades, new finishes,

and many new parts must be provided. While many other costs must be included, this first principal cost is only about 6 percent of the estimated cost of the STP.

Renovation of Terminals A and B will include removal of some ticket counters, four baggage carousels, some baggage check equipment, and the partitions that separate sterile and non-sterile areas. Terrazzo floor finishes may be replaced, but will be retained if possible. White sound abatement materials will be installed as part of the lighting system in the ceiling pans. New LED lighting systems will be installed throughout the terminals. The ceiling panels will be adorned with artistic designs somewhat like those on the ceiling of Nashville's Parthenon.

Construction within Terminals A and B will include installation of one-way revolving doors, TAO counters, and TSA checkpoints. Existing restrooms, seating areas, and restaurants will be remodeled. HVAC, electrical, and sound systems will be replaced as needed.

This construction work must be completed outside each terminal:

- Demolish three circulation towers
- Demolish existing pavements
- Abandon storm sewer and water lines
- Construct three new circulation towers
- Construct a new tunnel 2
- Construct three tunnel tower connections
- Construct a 1,300 feet of retaining wall
- Install new storm sewer and water lines
- Construct two terminal extensions
- Construct the link

Airside modifications will include improved collection of de-icing fluids and re-alignment of the principal taxiways that currently run in a circular pathway around the terminals.

22. SUMMARY

ALT 30 meets or exceeds the most important requirements listed in Table 1, at least in rounded values. ALT 30 is feasible, practical, and produces a more spacious airport design. Built from scratch, it would not be as efficient as the STP. However, ALT 30 is not built from scratch. Much is salvaged. While renovation projects often encounter unexpected difficulties, there is a large gap between the expected costs for ALT 30 and the STP.

KCMO's Aviation Department must support development of plans and renderings for both ALT 30 and the STP to put both plans on an even footing if the public is to view the competition as being fair and open. In addition, feasibility assessments and cost estimates must be produced.

ALT 30 produces a more convenient airport for passengers than the STP at much less cost. Airlines will have access to more gates and larger holding areas. Airline operating costs will go down because of increased parking, restaurant, and concession revenues.

KCMO will benefit because its citizens will have more convenience, more direct flights, and lower bond indebtedness. If ALT 30 costs $600M while the STP costs $1,000M, then KCMO must support $400M less in debt. While KCMO will not directly pay for the cost of ALT 30 or the STP, they will pay for the selected plan indirectly through higher user fees. In addition, KCMO will issue the bond, and this bond will appear as increased indebtedness. KCMO may have to pay higher interest rates on new bonds if a more costly plan is selected.

The Aviation Department should confirm the feasibility of adding one parking level to Garages A and B. The added parking spaces will make KCI more convenient and provide important new revenue to support the cost of renovation. Previously considered renovation plans did not take this capability into account. This capability, which needs to be confirmed, greatly enhances the value of renovation plans.

Abandonment of circular roadway and taxiway alignments is the key innovation that makes ALT 30 a successful renovation plan for KCI. ALT 30 restores the original design functionality of KCI and salvages two terminals, two parking garages, four baggage carousels, multiple restaurants, twenty restrooms, and several TAO counters and baggage conveyors while providing convenient, safe operations. The addition of two linked terminal extensions and one-way revolving doors to the existing terminals is a low-cost alternative to the $1B± STP plan. ALT 30 is a renovation plan for KCI that has merit and should be considered along with the STP plan. By mounting a competition between ALT 30, the best renovation plan, and the STP, the airlines, Aviation Department, elected officials, and public can move forward with confidence without delay.

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TABLE 1. CURRENT AND REQUIRED AREAS FOR KCI FUNCTIONS

FUNCTION	CURRENT	REQUIRED	ALT 30
Gates	29	35	36
Ticketing/Check-in	20,879	32,000	54,000
Security Checkpoint	29,951	18,640	22,542
Departure Lounges	100,281	81,600	
Post-Security Departure Corridor	0	95,540	
Post-Security Restrooms	4,949	11,200	11,072
Airline Club	0	2,500	
International Arrivals	21,001	31,460	
Concessions	60,097	70,660	
Pre-Security Circulation, Restrooms, and Seating	156,283	58,200	
Bag Claim	17,745	45,710	
Baggage Makeup	72,761	82,080	
Airline Operations/ATO/BSO	96,591	56,720	
Non Public Spaces	91,955	49,450	
Terminal Functions (HVAC, MEP)	101,357	117,200	

The first three columns of Table 1 were obtained from page 15 of the Aviation Department's update to the Mayor and City Council entitled *KCI Development Program Process Update* and dated 21 July 2015. Information is lacking to allow populating values for all of ALT 30 functions.

APPENDIX A – PARKING GARAGES A AND B

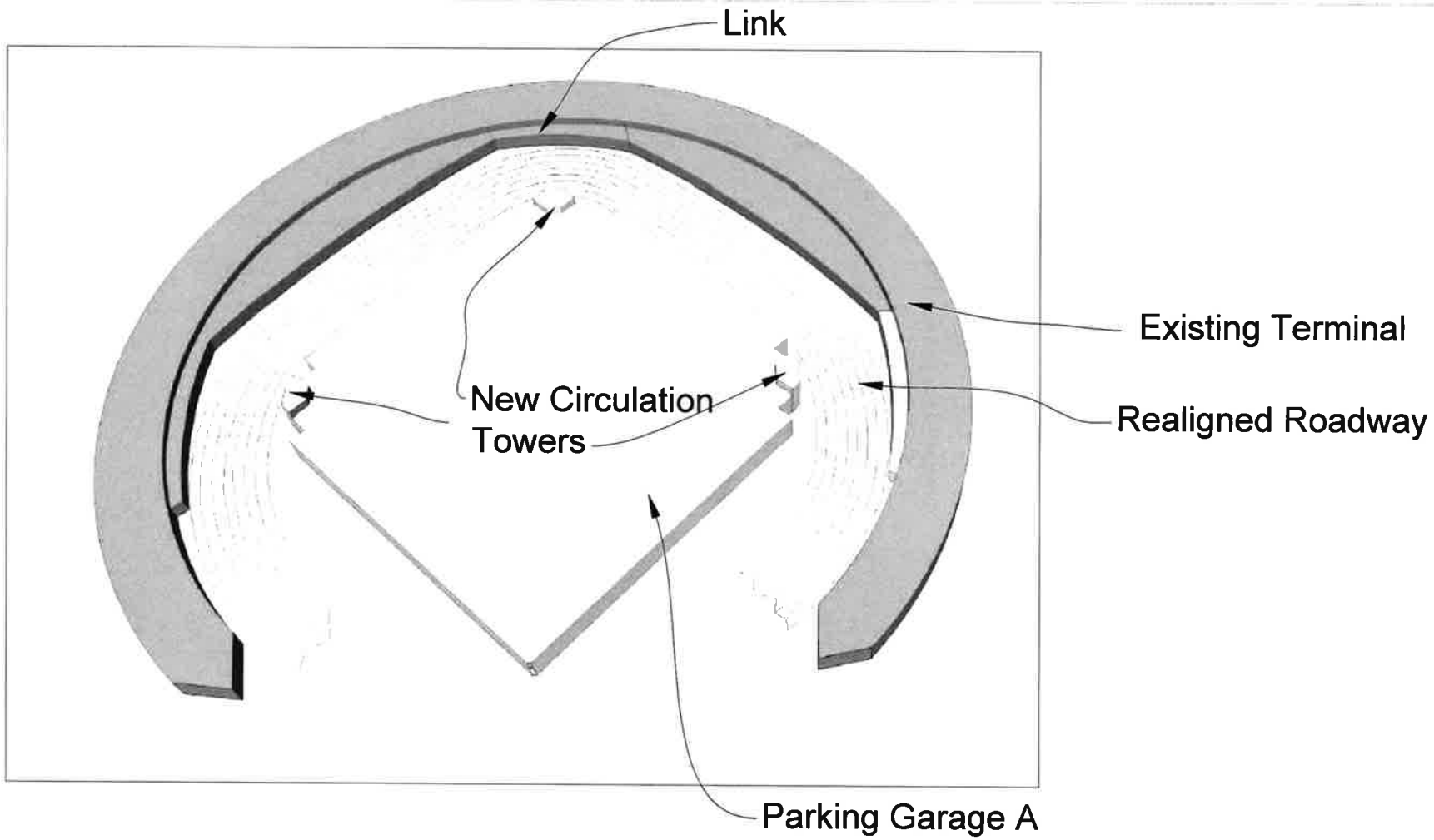
A January 20, 2016 Kansas City Star front-page article showed a renovation plan for KCI prepared by Crawford Architects. Crawford's plan called for partial demolition of Garages A and B (trimming of the corners) and replacement of six circulation towers. Two additional levels of parking would be added on each garage.

It is probably not possible to trim the corners of the parking garages because they have post-tensioned decks. This 2017 version of ALT 30 requires replacement of the circulation towers, but does not require trimming of the corners of the parking garages. The parking garages in Terminals A and B are composed of six large square buildings and three smaller rectangular buildings. Five of the buildings were designed for six levels of supported parking while the remaining four buildings were designed for just two levels of supported parking. Columns supporting buildings designed to support only two levels of parking are only about 20 percent smaller than those that can support six levels. While steel reinforcing content is unknown, it is likely that the buildings designed for just two supported levels can actually support three levels since the columns are relatively large. One garage is supported by piles. A minimum of three piles are required for interior columns and two are required for exterior columns regardless of column load. The piles supporting the six-story columns probably have the same diameter as those that support just two levels. For these reasons, it is likely that the existing pile foundations can support three levels of parking.

The other garage is supported by shallow spread footings that probably bear on dense glacial till. Actual bearing pressures are probably much less than the allowable bearing pressure. For these reasons, it is likely that a third level of parking can be added to Garage A and B providing a large increase in revenue from parking fees. This will also increase the availability of parking at Terminals A and B. The engineer of record for structural design of the garages in Terminals A and B provided technical information about the garages. His firm can evaluate the feasibility of adding one level of parking to each garage.

Since the garages were designed under the Uniform Building Code and KCMO now operates under the International Building Code, seismic design standards may require some improvements. It may be necessary to add shear walls within the garages or viscous dampers between the garages and the new retaining walls that will support the relocated roadway.

If one additional parking level can be added as is expected, parking garage revenues should increase by about 33 percent. The increased revenue from parking comes at little expense because there are no property acquisition, site development, or foundation construction costs. This additional revenue will pay for much of the renovation cost.



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3D VIEW
ALT 30 RENOVATION PLAN

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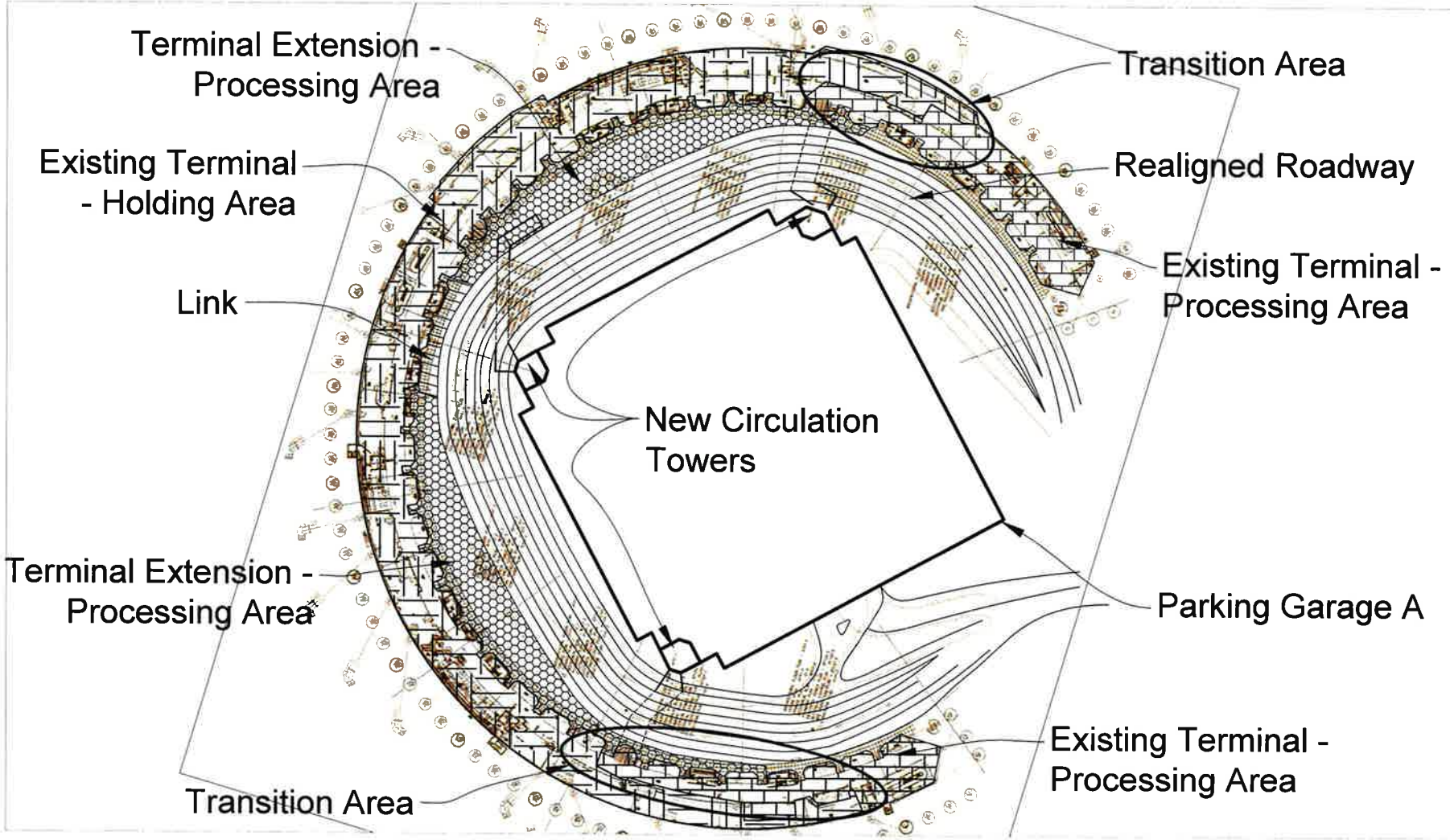
Drawn By:	CHC
Date:	2-27-2017
Drawing:	30-1



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REALIGNED ROAWAY, LINK, TWO TERMINAL EXTENSIONS, HOLDING AND PROESSING AREAS
ALT 30 RENOVATION PLAN

Project No:	N/A
Drawn By:	CHC
Date:	2-27-2017
Drawing:	30-2



HOLDING AREA



PROCESSING AREA



TERMINAL EXTENSION



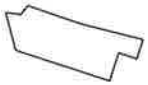
EXISTING RESTROOM



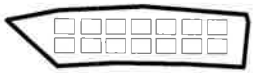
NEW RESTROOM



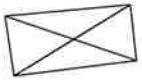
EXIT LANE



EXISTING TAO COUNTER



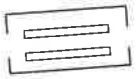
EXISTING RESTAURANTS



NEW TAO COUNTER



PALLET LOOP CONVEYOR



TSA CHECKPOINT



ONE-WAY REVOLVING DOOR

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HATCHING AND SYMBOL LEGEND
ALT 30 RENOVATION PLAN

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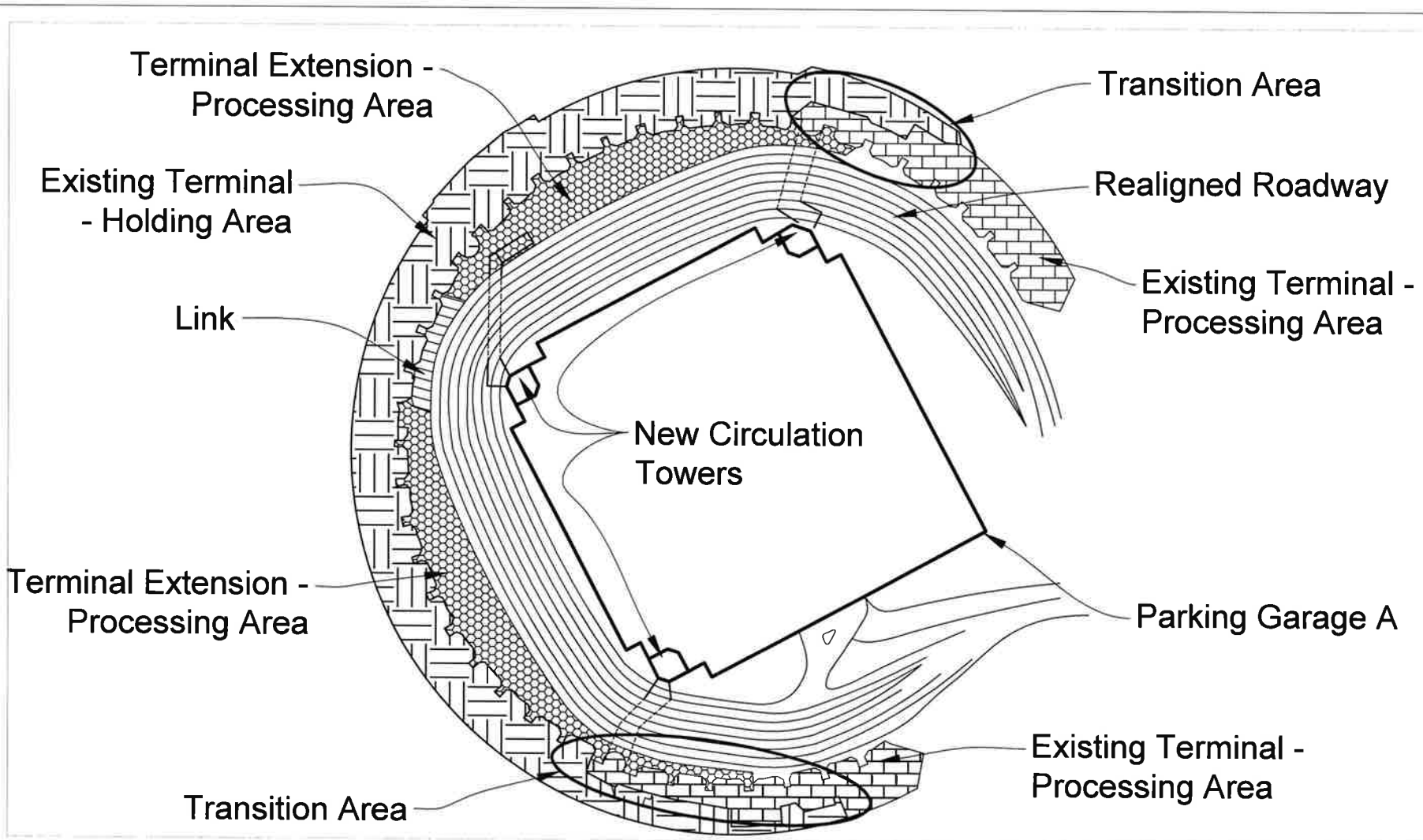
Date:	2/27/2017
Drawing:	30-3



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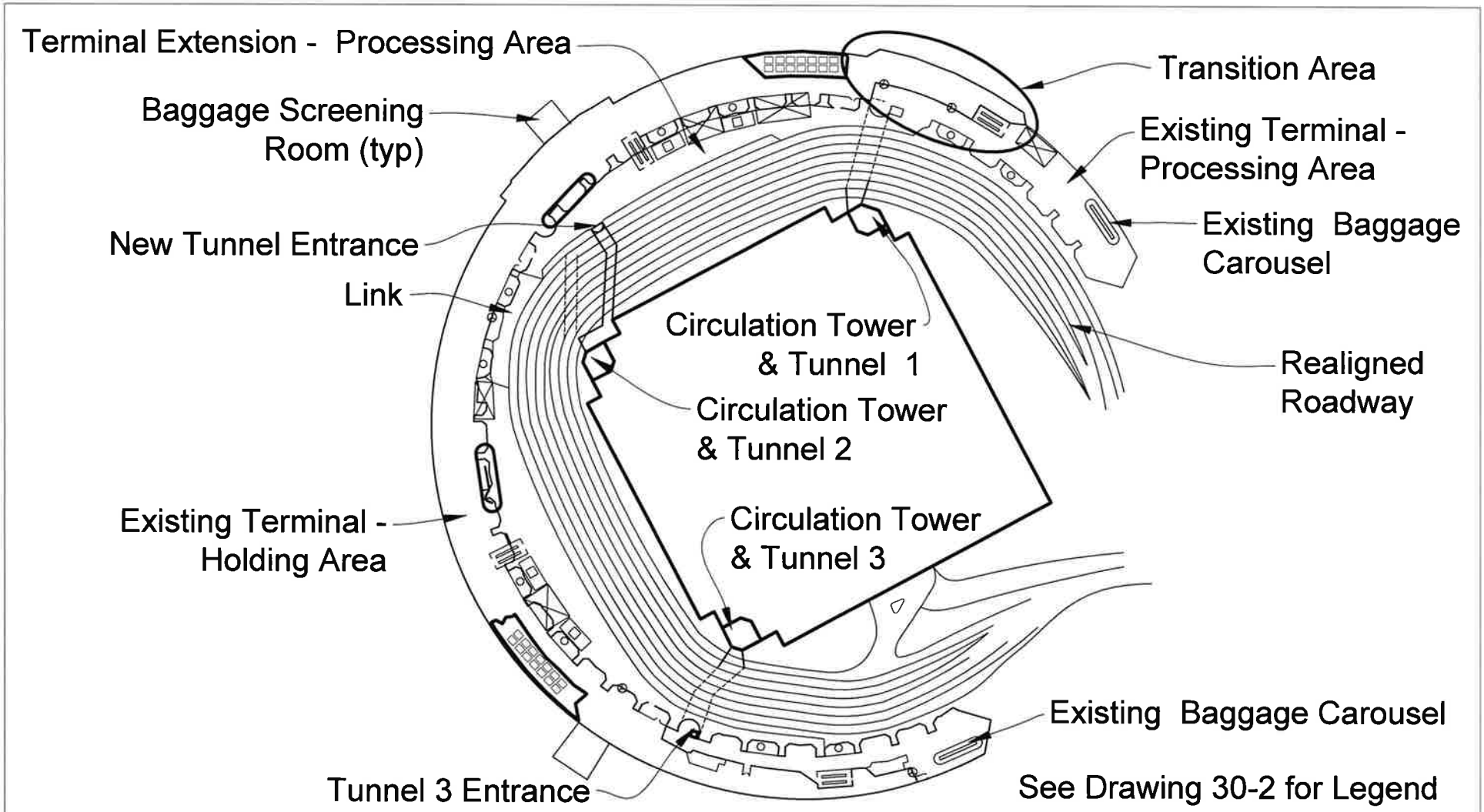
REALIGNED ROAWAY, LINK, TWO TERMINAL EXTENSIONS, HOLDING AND PROESSING AREAS
ALT 30 RENOVATION PLAN

Project No:	N/A
Drawn By:	CHC
Date:	2-27-2017
Drawing:	30-4



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REALIGNED ROADWAY, LINK, TWO TERMINAL EXTENSIONS, HOLDING AND PROESSING AREAS
ALT 30 RENOVATION PLAN

Project No:	N/A
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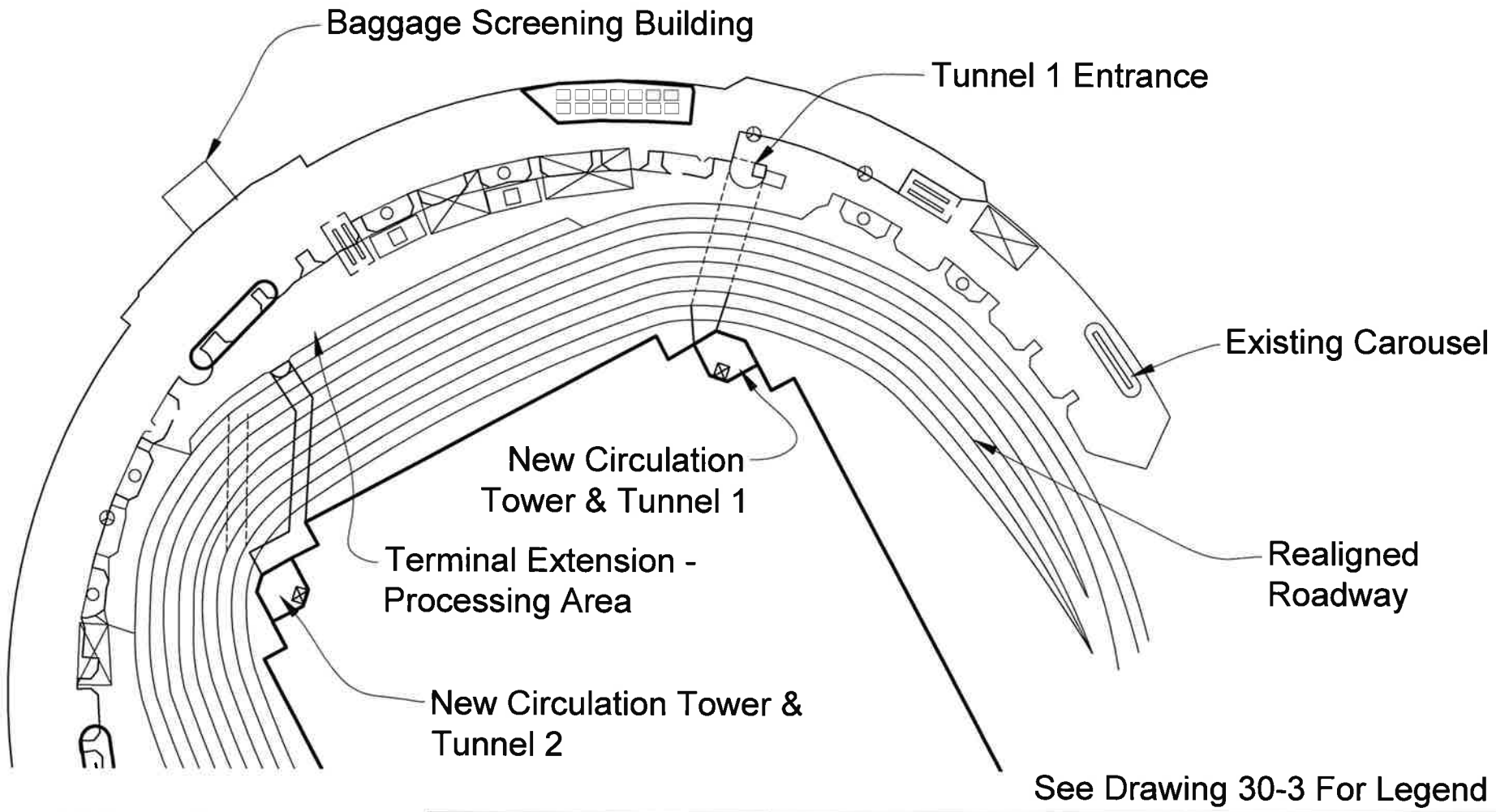
Date:	2/27/2017
Drawing:	30-5



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NORTH END TO TERMINAL CENTER
HOLDING AND PROESSING AREAS
ALT 30 RENOVATION PLAN

Project No:	N/A
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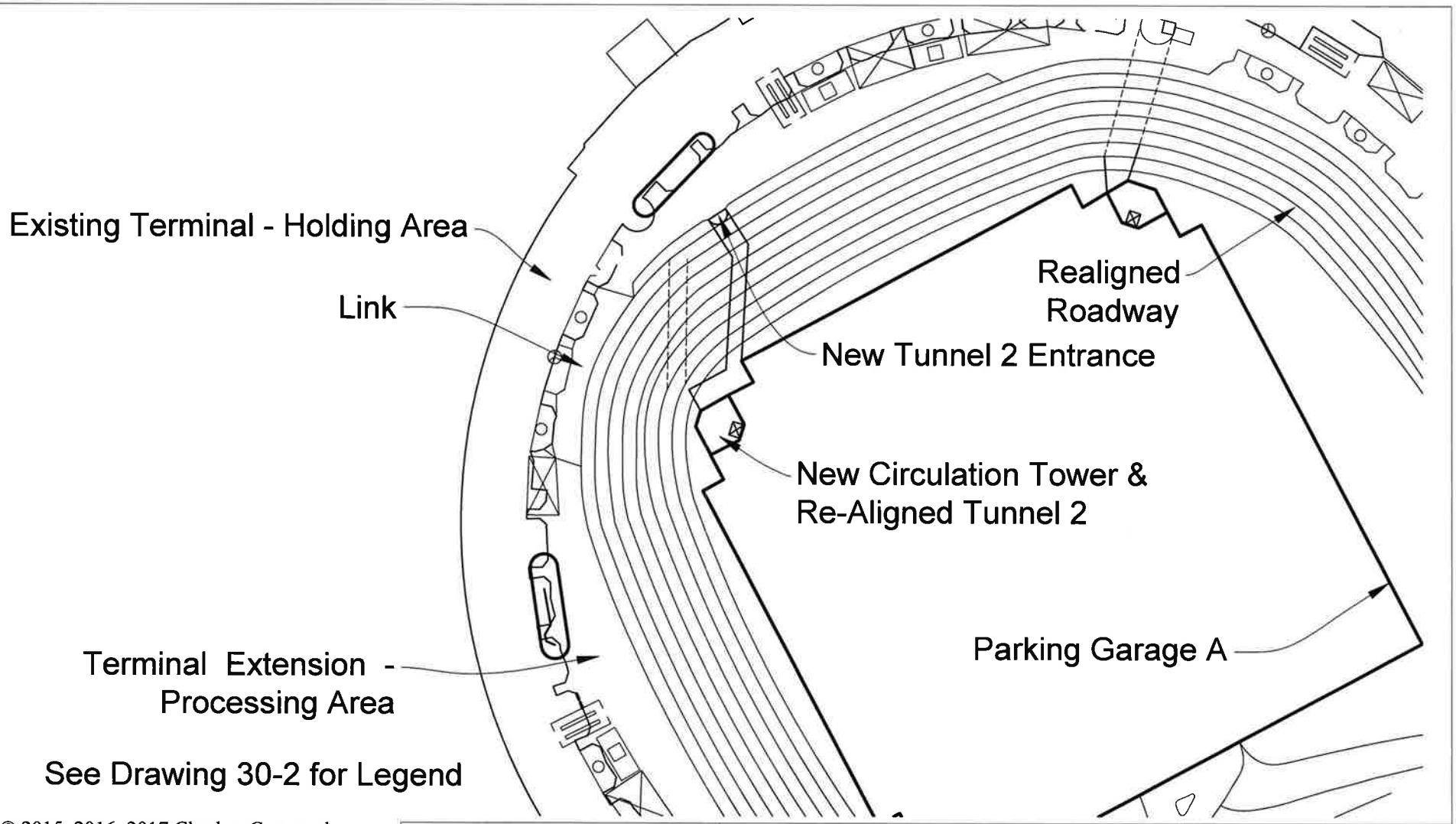
Date:	2/27/2017
Drawing:	30-6



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CENTER OF TERMINAL
HOLDING AND PROESSING AREAS
ALT 30 RENOVATION PLAN

Project No:	N/A
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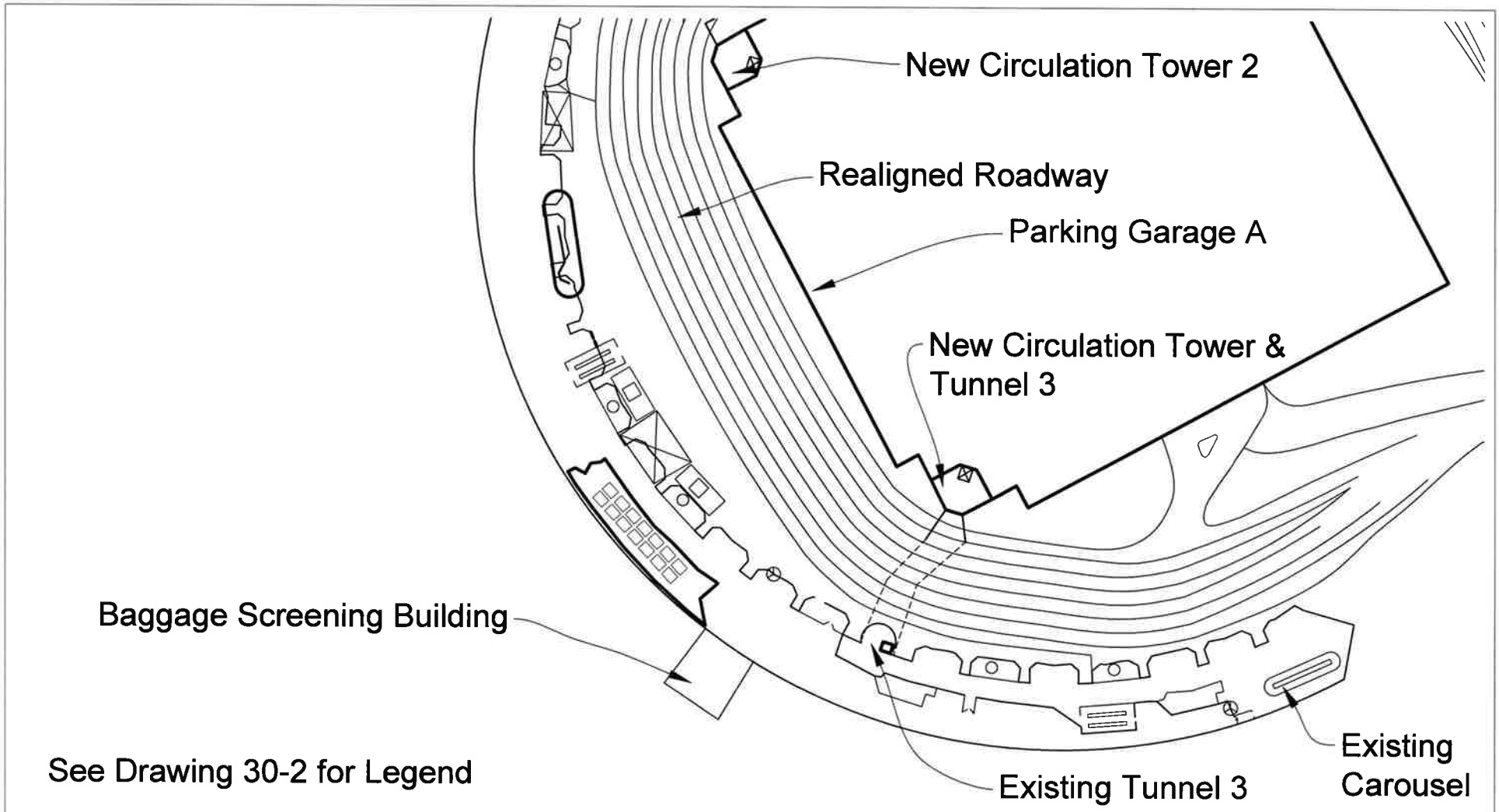
Date:	2/27/2017
Drawing:	30-7



See Drawing 30-2 for Legend

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CENTER TO SOUTH END
HOLDING AND PROESSING AREAS
ALT 30 RENOVATION PLAN

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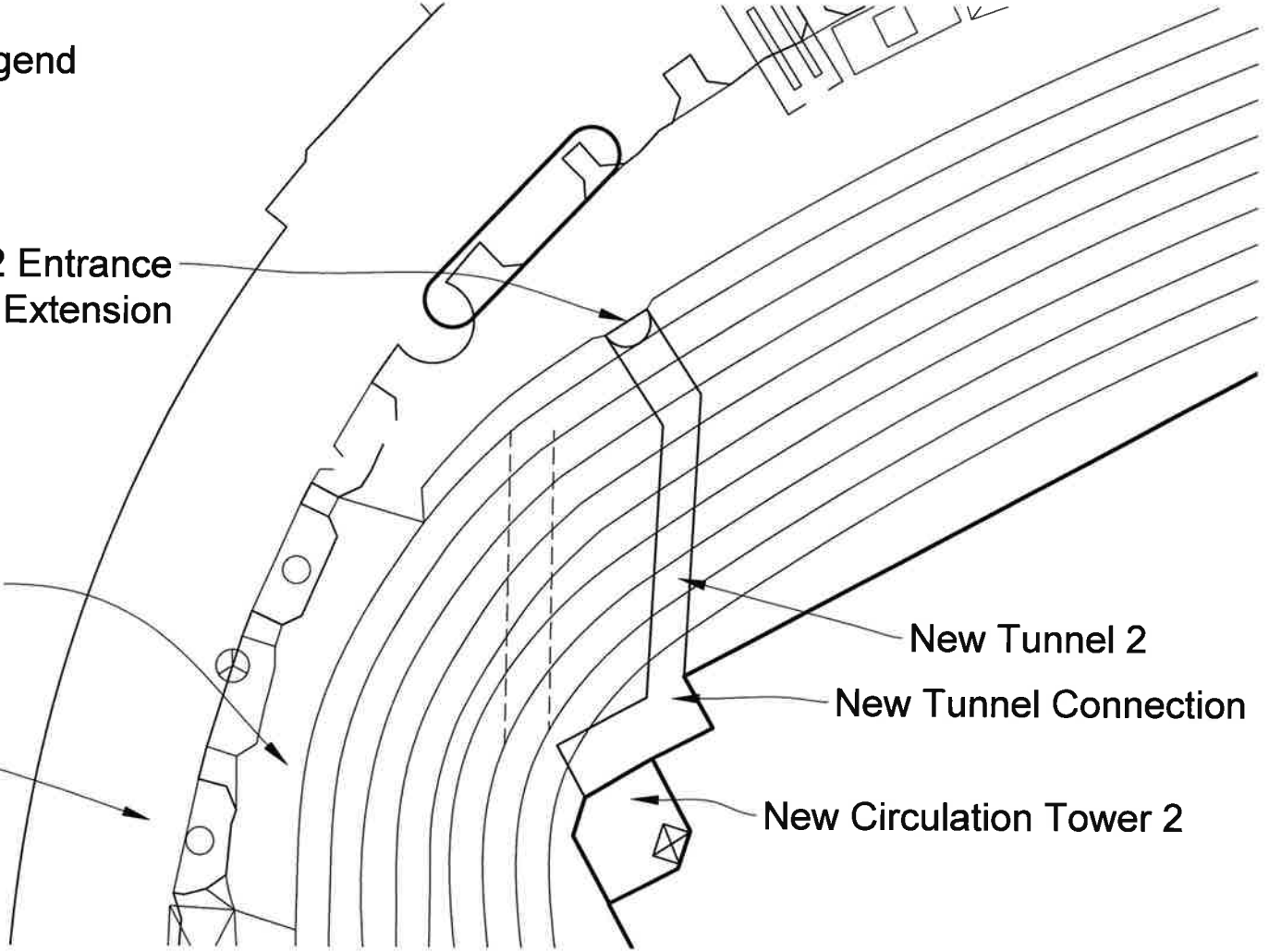
Date:	2/27/2017
Drawing:	30-8

See Drawing 30-2 for Legend



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TUNNEL 2 / TERMINAL CONNECTOR
ALT 30 RENOVATION PLAN

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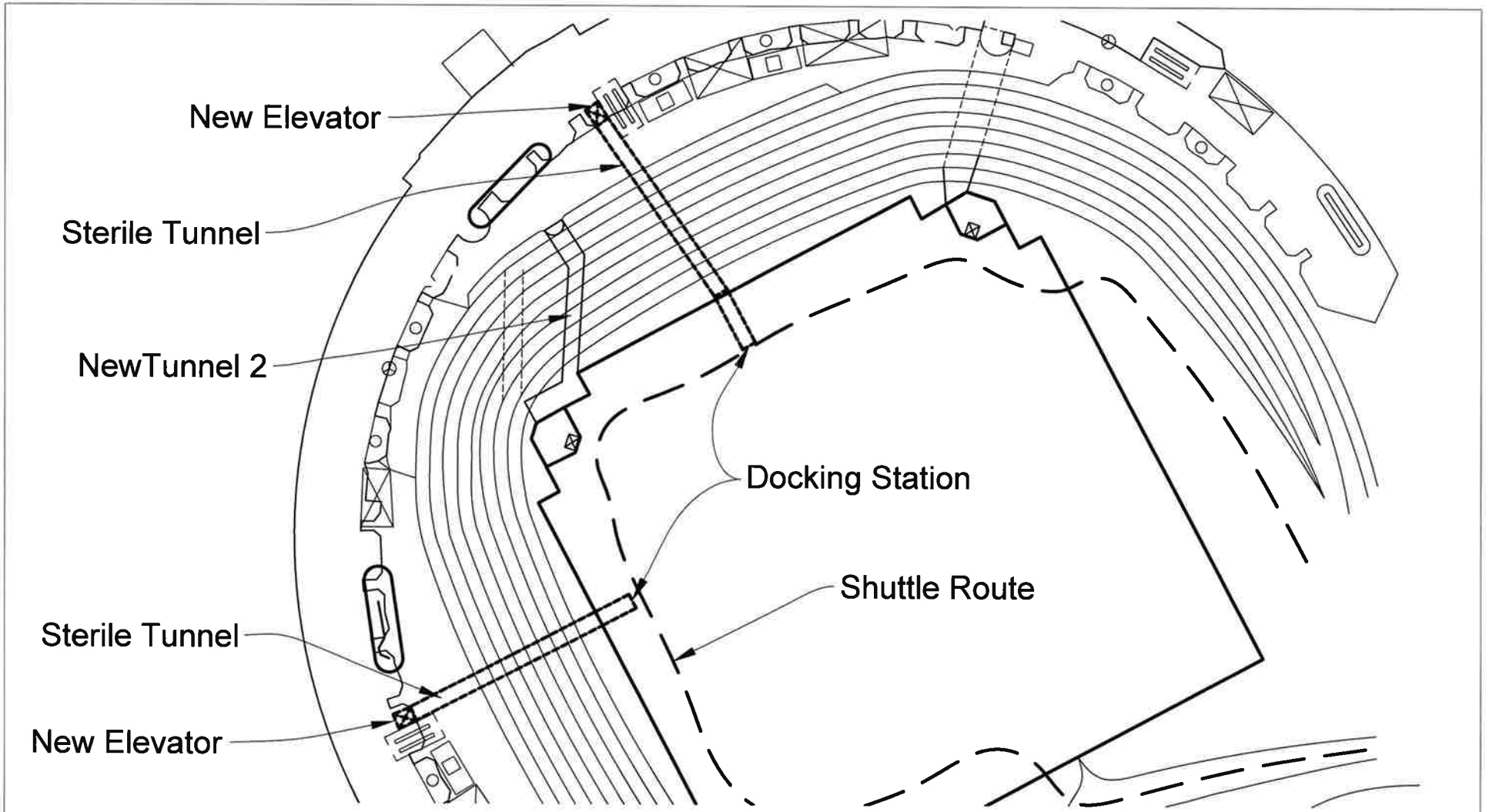
Date:	2/27/2017
Drawing:	30-9



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TERMINAL TO TERMINAL TRANSFERS
ALT 30 RENOVATION PLAN

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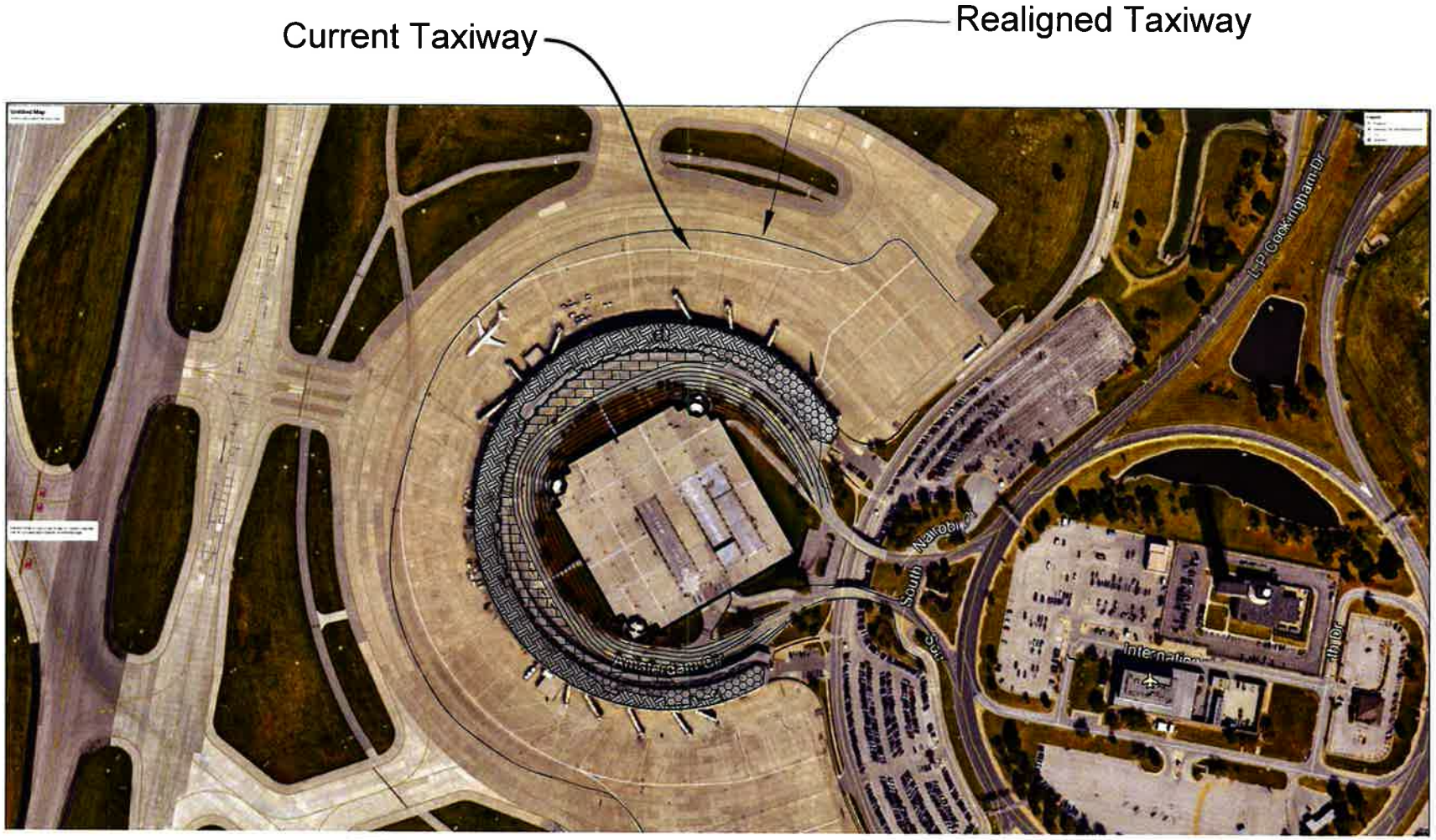
Drawing:	30-10



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REALIGNED TAXIWAY
ALT 30 RENOVATION PLAN

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Date:	2/27/2017
Drawing:	30-11

OCTOBER 2007 ADDENDUM

KCI RENOVATION PLAN – ALT 30

1. TERMINAL CONNECTOR

Perhaps the best way to move passengers between terminals (A, B, and C) is via special vehicles that operate on the apron as described in the original KCI Renovation Plan - ALT 30 report. Alternatively, a connecting structure (Connector) can be constructed between the west end of Terminal A and the east end of Terminal B as shown in Figure 1. The Connector might have a rectangular cross section as shown, but might also be triangular as is the Link in the Crossroads District of KC. The upper part of the Connector will be framed in steel and enclosed with glass. The Connector will terminate within sterile space in each terminal. Passengers needing to move to another terminal to catch a connecting flight can move through the Connector without leaving sterile, comfortable space. KCI computer systems will know when and where passengers will arrive that need to be transported to another terminal. Passengers will board small electrically powered trams at their arrival gate, then ride to their destination gate. Passenger volume should be low initially because only passengers needing to reach a connecting flight will need to travel to another terminal. This system also works within a terminal allowing passengers with reduced mobility to reach a distant gate with little difficulty to catch a connecting flight. This plan does introduce vehicles equipped with beepers into KCI, but these vehicles will prove useful. Terminal B can also be connected to Terminal C using the same basic design. This would also make Garage C available to passengers.

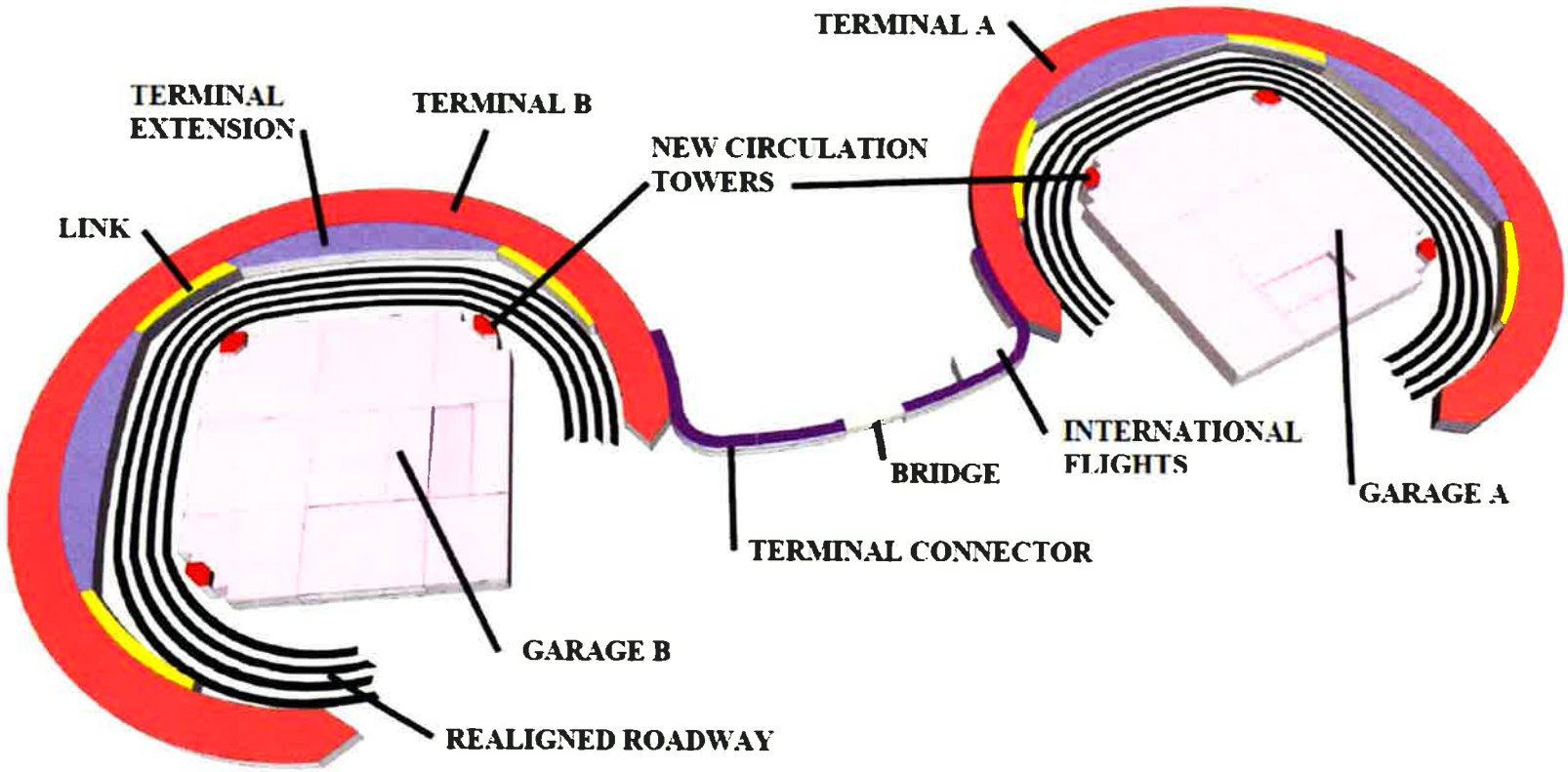
The entire Connector can be constructed as a bridge like the Link in the Crossroads District, but it might also be constructed as a two-story structure that can provide greater floor stability and support for the vehicles than a bridge. In any event, a short bridge will be required within the Connector as shown on Figure 1.

2. ADA COMPLIANT EMPLOYEE ENTRANCES

The Connector provides a practical and very effective terminal entrance into non-sterile space that meets ADA requirements. Employees that live and work with disabilities can park their vehicles beneath rain shelters near the center of the surface parking lot located across the street from the Connector. A canopy will extend across the roadway to the Connector. Two partially enclosed ramps constructed integrally with the Connector will rise up from near the bridge to the terminals. The upper end of each ramp will terminate in either Terminal A or B. All employees will benefit greatly from this new ramp system because all employees will be sheltered from the sun, wind, rain, and snow.

3. INTERNATIONAL FLIGHTS

International flights will dock at a new International terminal extension located on the apron side of the Connector near the west end of Terminal A. The extension will include a baggage carousel and work area for US Customs. After passing through Customs, passengers will travel through the Connector to reach either the existing Terminal A or B and ground transportation systems beyond. The extension will be located in an area of the apron where aircraft presently do not operate. Aircraft as large as a DC-8, KCI's critical aircraft, or perhaps larger that are capable of making long international flights will be able to dock at passenger boarding bridges at the International extension. No domestic gates are expected to be eliminated due to construction of the International extension.

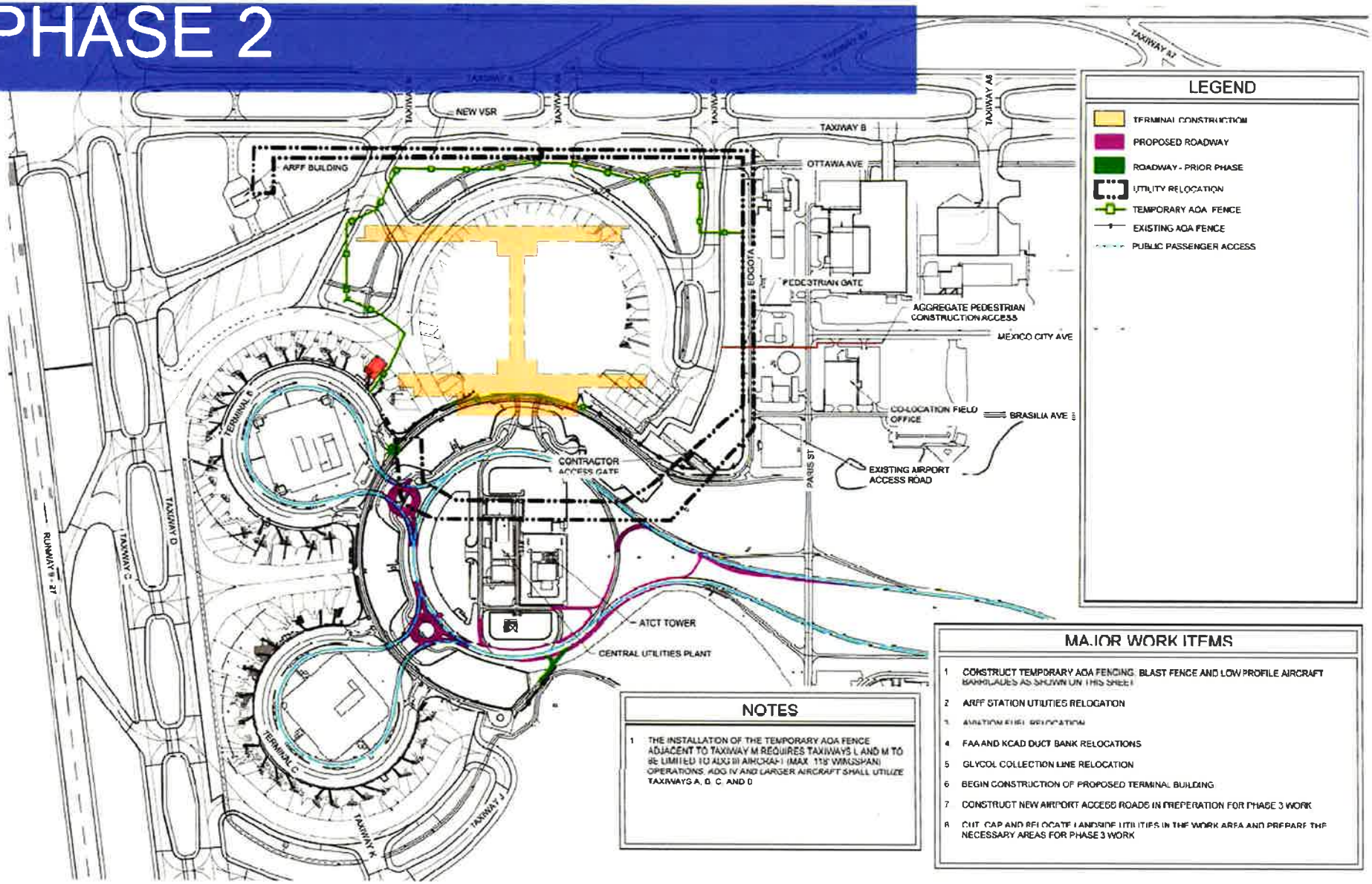


Cammack GeoConsulting
Lenexa, Kansas 66215
alt30kci@gmail.com

3D OVERVIEW
KCI RENOVATION PLANS - ALT 30
CONNECTOR AND
INTERNATIONAL FLIGHTS

Project No:	
Drawn By:	CHC
Date:	10/9/2017
Drawing:	1

PHASE 2



LEGEND

- TERMINAL CONSTRUCTION
- PROPOSED ROADWAY
- ROADWAY - PRIOR PHASE
- UTILITY RELOCATION
- TEMPORARY AOA FENCE
- EXISTING AOA FENCE
- PUBLIC PASSENGER ACCESS

NOTES

1. THE INSTALLATION OF THE TEMPORARY AOA FENCE ADJACENT TO TAXIWAY M REQUIRES TAXIWAYS L AND M TO BE LIMITED TO ADG III AIRCRAFT (MAX. 118' WINGSPAN) OPERATIONS. ADG IV AND LARGER AIRCRAFT SHALL UTILIZE TAXIWAYS A, D, C, AND D

MAJOR WORK ITEMS

1. CONSTRUCT TEMPORARY AOA FENCING, BLAST FENCE AND LOW PROFILE AIRCRAFT BARRICADES AS SHOWN ON THIS SHEET
2. ARFF STATION UTILITIES RELOCATION
3. AVIATION FUEL RELOCATION
4. FAA AND KCAD DUCT BANK RELOCATIONS
5. GLYCOL COLLECTION LINE RELOCATION
6. BEGIN CONSTRUCTION OF PROPOSED TERMINAL BUILDING
7. CONSTRUCT NEW AIRPORT ACCESS ROADS IN PREPERATION FOR PHASE 3 WORK
8. CUT, CAP AND RELOCATE LANDSIDE UTILITIES IN THE WORK AREA AND PREPARE THE NECESSARY AREAS FOR PHASE 3 WORK

Chris Babb

From: KCIEA Comments
Subject: FW: Comments on KCI EA and unresolved Section 106 compliance
Attachments: Fix KCIA Section 106 Complince Failures.pdf

From: Raab, L Mark <raabl@umkc.edu>
Sent: Wednesday, September 19, 2018 9:28 AM
To: katherine.andrus@faa.gov; KCIEA Comments <KCIEAcomments@landrum-brown.com>
Cc: warrenwatkins@yahoo.com; brucewatkins007@gmail.com; ifrancis42@sbcglobal.net; annmraab@gmail.com; anne.n.christenson@faa.gov; scott.tener@faa.gov; sstokely@achp.gov; Burke, Amanda <Amanda.Burke@dnr.mo.gov>
Subject: Re: Comments on KCI EA and unresolved Section 106 compliance

Dear Ms. Andrus,

As relates to the issue of anticipatory impact, there is a Record of Decision for this case which is informative. Reviewers of the project repeatedly expressed concerns about evaluation and protection of the historic properties discussed in our comments (attached). A final Environmental Impact Statement (EIS) was submitted by the FAA and the EIS clearly identifies these historic properties for protection. You can see this EIS here:

https://books.google.com/books?id=y900AQAAMAAJ&pg=RA1-PA1&lpg=RA1-PA1&dq=kansas+city+international+airport+FAA+cultural+resources&source=bl&ots=JlWSFfVEA3&sig=2Z_WXRCYRMsYSlvGL1K1wqZYD2E&hl=en&sa=X&ved=2ahUKEwiHqOXK5rfdAhXumq0KHakMDOk4ChDoATACegQICBAB#v=onepage&q=kansas%20city%20international%20airport%20FAA%20cultural%20resources&f=false



Kansas City International Airport ALP, Land Acquisition, Airport Development ... - Google Books

books.google.com

Page four of the FAA submittal letter addresses the historic properties in question:

"The buildings of the historic interest would not be affected by construction until after 2000. However FAA intends to condition any grant for land acquisition or reimbursement which would include these sites on language is made pursuant to procedures for Protection of Historic and Cultural Properties 36 CFR 800 and section 4 f of the DOT Act as applicable. See BIS 6G on page 6-7. A similar provision will apply to protect archeological sites prior to any construction which could affect them see top of page 6-8."

If you look at the review letters included in this file, you see repeated concern that these properties be appropriately evaluated and protected. For example, the Missouri SHPO makes this statement on page 34 of the document:

"9-6-79
Mr Ken Ornes Federal Aviation Administration Airports Division Planning Branch
601 E 12th Street Kansas City Mo 64106
Dear Mr Ornes The Department of Natural Resources has reviewed the Draft Environmental Impact Statement concerning the Kansas City International Airport long range expansion plans set forth in the document concerning the archaeological resources of the Office of Historic Preservation within the Department of Natural Resources. Prior to any construction we request that the Office of Historic Preservation be given an opportunity within the acquisition area. This evaluation will be for the purpose of National Register eligibility If you have any questions about these requests please contact Mike Heichman in the Office of Historic Preservation Phone 314 751 4096 Thank you for this opportunity for review"

There is also this lengthy statement about the historic resources by the DOT:

"2 Cultural Resources
We note that the National Register of Historic Places and the State Historic Preservation Officer SHPO have been consulted concerning the existence of known sites on or eligible for the National Register and that the airport expansion area has been surveyed for both historic and archeological sites. However the draft statement does not show adequate compliance with cultural resource protection procedures for the sites identified.

The final statement should provide determinations of the level of significance local State or national for the seven historic sites as provided for in 36 CFR 63. These determinations must address the whole of the historic site not just the structure itself. Many structures are considered architecturally or historically significant precisely because of their relationship to their setting. The determinations should be undertaken in consultation with the SHPO and with appropriate local groups or individuals with historical expertise If it is determined that any historic sites meet or may meet the National Register criteria then the procedures of 36 CFR 800.4 should be followed and reported in the final statement.

For the archeological sites we recommend following the procedures provided by the Missouri Office of Historic Preservation items 3 and 4 page 5 67. The results should be reported in the final statement. We are also concerned with the proposed mitigating measures for the historic sites The draft states p 5 40 that If after further study these structures are determined to be of sufficient value for inclusion on the National Register of Historic Places the City of Kansas City Missouri will make every effort to relocate these structures to a permanent alternative site Since the setting may be an important element to the significance of a historic structure relocation might not be an acceptable mitigation measure."

As a Record of Decision, it's clear that several reviewers had concerns about inadequate evaluation and treatment of the historical properties. It's also evident in the final EIS that the FAA tasked the airport to properly evaluate and protect these properties. The subsequent Section 106 evaluation of these properties by ERCM (1987) was carried out and, as we noted in our comments (attached), five of these structures were found Register eligible. It's after this finding that a mysterious "gap" appears in the compliance record. After being found Register eligible in 1987, and despite the guidance provided by the project final EIS, there is no record of what happened to these structures until 2008, when ERCM (2008) notes that the structures have been razed with no Section 106 compliance record. p47

What does this mean with regard to current cultural resources concerns? We find this comment by the DOT review particularly relevant: "These determinations must address the whole of the historic

site not just the structure itself. Many structures are considered architecturally or historically significant precisely because of their relationship to their setting." As we noted in our earlier comments, airport historic sites of this type have been found to contain Register eligible archaeological deposits. This is clearly documented in ERCM 2009. While the above-ground structures have been destroyed, we do not yet know if these sites contain significant archaeological deposits. P48

As regards anticipatory destruction, we believe the record of consultation and final EIS issued by the FAA for this project made it abundantly clear that these historic properties were to be appropriately protected by the airport into the foreseeable future. The Missouri SHPO clearly stated its intention that the airport give the SHPO an opportunity to comment on treatment of these properties. Is there any record of such consultation during the mysterious compliance "gap" noted above? As far as we are aware, no records have been produced by the airport or SHPO for this time period. Moreover, it remains an open question whether potentially significant archaeological deposits exist at these sites. This possibility has yet to be adequately documented. P49

To repeat, we believe that Section 106 compliance in this case has not been satisfactorily concluded, and this deficiency should be addressed in the pending EA.

Sincerely,
Mark Raab, Ph.D.
For the Watkins Foundation,
Kansas City, Missouri

Chris Babb

From: KCIEA Comments
Subject: FW: Comments on KCI EA and unresolved Section 106 compliance

From: Raab, L Mark <raabl@umkc.edu>
Sent: Wednesday, September 19, 2018 6:40 PM
To: Katherine.Andrus@faa.gov; KCIEA Comments <KCIEAcomments@landrum-brown.com>
Cc: warrenwatkins@yahoo.com; brucewatkins007@gmail.com; ifrancis42@sbcglobal.net; annmraab@gmail.com; anne.n.christenson@faa.gov; scott.tener@faa.gov; sstokely@achp.gov; Amanda.Burke@dnr.mo.gov
Subject: Re: Comments on KCI EA and unresolved Section 106 compliance

Ms. Andrus,

Thank you, kind as always. We're not trying to build a time machine to trouble you with dubious demolition issues. The lost sites are in the pending EA's APE and the Section 106 study is specifically tasked with assessing past Section 106 studies in the APE. As noted earlier, the draft Section 106 study makes no reference to major previous Section 106 studies at the airport. One of the omitted reports (ERCM 2009) excavated historic properties like those lost and found Register eligible, exceptionally preserved subsurface structural remains and archaeological deposits. This record does not give us much confidence the airport is making a good faith effort to assess affects of the proposed action. Archaeological deposits have a substantial probability of surviving at the five sites where above ground architecture went missing. Unless we get these five sites evaluated, the airport will likely be free to develop those properties in the future with no record of the existence of potentially significant archaeological resources. This includes expansion of facilities related to the replacement terminal. p50

Mark Raab

Dismantling the Miller Farm:
What About the Descendants?

9-21-18

Comments on KCIA Draft Environmental Assessment
Watkins Foundation of Kansas City, Missouri

In earlier comments, we documented a long-standing pattern in which KCIA has "disappeared" archaeological and historical resources. These efforts include apparently unauthorized demolition of Federally-protected historic structures; declaring that no minority communities have been found that might claim a connection to airport historic properties; legal conflicts of interest with African American and Euro-American descendants over historic properties, and failure to include major archaeological investigations in the airport's pending Section 106 report.

Dismantling standing architecture on a Federally-protected archaeological site may be another example the airport's ever-diminishing archaeological resources. The circumstances surrounding demolition of stone chimneys on the Miller farm archaeological site, 23PL-1507, remain murky, despite our requests for information about alterations to the integrity of this National Register-eligible historical and archaeological site. P51

Dismantling the Miller farm is also an example of the airport's denial of responsibility to consult with declared community historic preservation stake-holders. In the case of the Miller farm, these include living Miller family descendants and the descendants of African American slaves once owned by the Miller family. Significantly, both groups of descendants successfully opposed the airport's efforts to move the Miller-Rixey historic cemetery associated with the Miller farm archaeological site (Missouri Court of Appeals 2009). This legal history alone indicates the descendants' stake in these historic properties. Descendants, including the Watkins Foundation, have also notified the airport repeatedly of their interest in preserving African American history associated with these properties. Could there be clearer identification of stake-holders in management decisions involving the Miller farm site?

Miller Farm Saga

Located deep inside the airport's security perimeter, the Miller farm site is all but invisible to the public. Few people understand the extraordinary role this 19th Century farm played in Missouri and U.S. history or the farm's exceptional degree of archaeological preservation.

Jesse Miller brought his family and slaves to Missouri's Platte Purchase in the 1830s, achieving considerable wealth as a hemp and tobacco farmer (ERCM 2009). Like many others on the airport's 53-square-miles of land, the Miller's brought slaves to work their farm. In bringing slavery to the mid-19th Century American frontier, Miller and

his neighbors ignited a border war between slave-owning Missouri and abolitionist Kansas. Within two decades of Miller's arrival, bloody cycles of arson and murder raged back and forth across the Missouri-Kansas border, located a few miles west of the Miller farm. Historians describe this Missouri-Kansas border war as the burning fuse that exploded into the American Civil War (see ERCM 2009).

When Civil War came to Missouri, one of Jesse Miller's slaves, George Washington, escaped to Kansas where he joined the first African American regiment of the Civil War. The 1st Kansas Colored Volunteer Infantry Regiment, including George Washington, were the first black men to fight Confederate forces during the Civil War. Outnumbered and outgunned, their first combat devolved into savage hand-to-hand fighting in which these ex-slaves-turned-soldiers threw back their attackers, a victory commemorated at Battle of Island Mound State Park, Bates County, Missouri. While some in the American public doubted that ex-slaves would stand and fight, after the Island Mound battle newspapers carried the headline, "They Fought Like Tigers!"

In 1997, the late Dr. Jimmy Johnson, African American Archaeologist from Kansas City, Missouri, conducted an archaeological excavation of the Miller farm. More than scientific research, it was a homecoming. Dr. Johnson's great-great grandfather was George Washington, runaway slave from the Miller farm, hero of Island Mound and surviving veteran of many combat campaigns in the Union army. Newspaper accounts record Dr. Johnson contacting the Miller family of Platte City, Missouri, descendants of Jesse Miller and owner of George Washington. It was these families, black and white, who later opposed the airport in the 2008 legal case noted earlier (Missouri Court of Appeals 2009). Dr. Johnson can be seen here describing his family's history and its connection to Miller farm:

https://www.youtube.com/watch?v=raVYOOFjcX8&t=298s

A 2009 archaeological excavation of Miller farm produced exceptionally preserved sub-surface architecture and extensive artifact deposits (ERCM 2009). The report of this excavation shows well preserved farm foundations and the standing cut-stone chimneys (see below) This excavation found the Miller farm site eligible for listing in the National Register of Historic Places, bringing it under Federal protection. Inexplicably, no reference to this study is included in the pending Section 106 report.

P52

Today, nothing remains of the Miller house cut-stone chimneys shown in the photos below. Where did they go? We asked the airport that question. The answer we received is that the airport considered the chimneys a safety hazard. They were torn down at some point after 2009 and the stones given to an off-airport party.

In 2017, we discussed the Miller farm's preservation status at a meeting attended by airport management. We asked if the airport talked to anyone about whether demolition of the chimneys was an acceptable alteration to the integrity of a Register-eligible property. Mr. Patrick Klein, Director of Aviation at KCIA, admitted that the airport had not considered consulting possible historic preservation stakeholders in the Miller site,

P53

despite having been previously notified of such interest by slave descendants represented by the Watkins Foundation of Kansas City, Missouri.

Did the airport consult with Missouri SHPO about its plan to demolish the chimneys? We don't know, but we believe this information should be available to the public. To date, we have no documentation of the decision to demolish the chimneys and whether alternative preservation strategies were ever considered. The latter might have included, for example, *in situ* stabilization of the chimneys or conveyance of the chimney stones to African American historic sites in Kansas City. The fundamental problem is that the airport, by its own admission, apparently never considered consulting with known historic-preservation stakeholders in the Miller property to evaluate alternative preservation strategies. This remains a fundamental flaw in the draft EA.] PS4

What About the Descendants?

To repeat, the existence of descendant stakeholders, black and white, with intimate connections to airport historical and archaeological resources have been known, and known to the airport, for decades. Interests of these stakeholders are manifest in oral a and written statements to airport management and in past legal proceedings with the airport. Yet the airport has shown no recognition of this fact, much less willingness to consult with these descendants about preservation alternatives.

Unfortunately, the example above is only one more instance of a decades-long pattern in which the airport makes decisions about historical and archaeological resources with little or no consultation with affected community stakeholders. The airport has no cultural resources management plan or other written policies which provide for consultation with historic preservation stakeholders, including black and white descendants of properties such as the Miller farm. The draft EA makes this problem worse because it fails to acknowledge any of the history or archaeological findings outlined above. Worse, the EA declares that no minorities have been identified which might assert an interest in the airports cultural resources.

As we noted in earlier comments on the Environmental Justice (EJ) section of the EA, the EA fails to acknowledge the many long-standing, intimate connections of living descendant communities to airport archaeological properties and that these connections raise potential EJ issues. By stating that no EJ minority communities or issues have been identified, the EA is effectively preempting any consideration of EJ issues related to cultural resources or the value of consulting with descendant communities that might identify such issues.

Complex Historic, Cultural and Racial Mosaic

We suppose that state and Federal regulators do not intend the airport to summarily exclude African American and other stakeholders, including descendant groups, from consultation in historic preservation planning. Unfortunately, as currently written, the

airport's EA will have just such an effect. This is because the EA provides no basis for such consultation, despite the declared interest of stakeholder groups such as the Watkins Foundation. A narrow reading of the EA's purpose might suggest that terminal construction will have no direct effect on the Miller farm and other archaeological properties and therefore need not consider descendant consultation. We believe such a view is shortsighted because it will continue to ignore obvious and meaningful community ties to the airport's archaeological and historical resources. P55

The airport encompasses the remnants of an historic 19th Century cultural landscape of national importance. The archaeological and historical context of KCIA does not exist in isolation from living communities, black and white. These communities have vital, living ties to this context. The EA should recognize that the airport is a complex historic, cultural and racial mosaic and start managing it accordingly.

What Are We Asking?

Federal and state historic preservation guidance consistently stresses the importance of consulting with community stakeholders when these can be reasonably identified. We are asking that the EA be amended to include such consultation in determining alternative resource management strategies.

References Cited

ERCM
2009 Cultural Resources Investigations, 23PL1470, 23PL1504 & 23PL1507, Kansas City International Airport (FAA). Prepared by Environmental Research Center of Missouri (ERCM), Jefferson City, Missouri. Report on file, Kansas City International Airport.

Missouri Court of Appeals, Western District 2009 IN RE: The Matter of The REMOVAL OF HUMAN REMAINS FROM CEMETERIES IN KANSAS CITY, PLATTE COUNTY, Missouri. City of Kansas City, Missouri, Appellant, v. Unknown and Unrepresented Persons and Olin Miller, Respondents. No. WD 70006. Decided: November 10, 2009



Photograph 1. *Miller Farm House on November 2008*



Photograph 5. *Partially Excavated Miller House*

Chris Babb

From: KCIEA Comments
Subject: FW: Fw: Writing African Americans out of history
Attachments: Offut slide.pptx

From: Raab, L Mark <raabl@umkc.edu>
Sent: Monday, September 24, 2018 8:18 AM
To: THOMAS LEVIN <tlevin7320@embarqmail.com>; warren watkins <warrenwatkins@yahoo.com>; Bruce Watkins <brucewatkins007@gmail.com>; Ike Francis <ifrancis42@sbcglobal.net>; annmraab@gmail.com; KCIEA Comments <KCIEAcomments@landrum-brown.com>
Subject: Re: Fw: Writing African Americans out of history

Tom,

Attached is a Power Point program that shows some of the historic sites at the airport, including the illegally destroyed houses we mention in some of our comments to the airport (Fix the Section 106 problems). Are any Offutt ancestors connected in some way to the destroyed properties shown in the Power Point? If we can find descendants related to these properties, that would be very important. ps 6

Thanks,
Mark Raab

From: Raab, L Mark
Sent: Monday, September 24, 2018 6:49:59 AM
To: THOMAS LEVIN; warren watkins; Bruce Watkins; Ike Francis; annmraab@gmail.com; KCIEAcomments@landrum-brown.com
Subject: Re: Fw: Writing African Americans out of history

Hello, Tom

Tom, I think I do remember meeting you at the dedication of the Kansas 1st statute at the courthouse in Butler. I'm guessing you are a descendant of Otho Offutt, one of the first ten men to join William Quantrill's company. Is this true?

We can use all the help we can get. Plenty to talk about. Bruce may have told you there is a meeting this evening at the Ambassador Hotel, 6:00-8:00 pm, near the airport. This is a meeting held by the airport to allow the public to comment on its current environmental study. Warren and Bruce and I will be there. We plan to make a presentation and offer our comments. Bruce may have told you that we have already sent several comments to the airport about the Environmental Assessment. I don't know if you have seen those. I have attached them here. You might begin with the comments on environmental justice and the demolition of the Miller farm.

One of the most important things that you and your cousin can do is let the airport and Federal authorities know that you care about what happens to the archaeological and historical sites at the airport. We are trying to get the Feds to recognize the descendants from the airport sites, black and white. Federal law says that the airport should be talking to these descendants about the airport's archaeology and history, if the descendant's tell the airport they want to be consulted. It's not about stopping construction of a new airport or anything

like that. We've always been in favor of a new airport. But we can have a new airport and properly care for the historic and the airport's archaeological properties. It's important to have as many descendants as possible speak up. The comment period on the Environmental Assessment ends on Oct. 10. Comments must go in before that date. Comments can be sent my email to:

Mr. Chris Babb at KCIEAcomments@landrum-brown.com

If you do send comments, we would appreciate it if you would cc us. If you can't make to the meeting tonight, we would be happy to meet with you at another time.

Thanks again for your interest,
Mark Raab

From: THOMAS LEVIN <tlevin7320@embarqmail.com>
Sent: Sunday, September 23, 2018 10:18:21 PM
To: Raab, L Mark
Subject: Fwd: Fw: Writing African Americans out of history

Mark, you would not have any reason to remember me but Jimmy Johnson introduced me to you and your wife while we were all attending an event regarding Island Mound in Bates County some years ago. I am a descendant of the Offutt family who settled in Platte County after leaving Kentucky in the 1850's. Jesse Miller was my great great grandmother's brother. Warren and Bruce Watkins are close friends of mine. Bruce, Jr. and I attended Southeast High School together. My second cousin in Frank Offutt, present mayor of Platte City.

I would like to help with this situation if I can. I do not know enough about this process, however, to know how to begin to comment or to make comments that might have any impact. Please feel free to reply to this e-mail or call me at (816) 896-0183.
Thanks,

Tom Levin
----- Forwarded Message -----
From: Warren Watkins <warrenwatkins@yahoo.com>
To: THOMAS LEVIN <tlevin7320@embarqmail.com>
Sent: Fri, 14 Sep 2018 12:48:25 -0400 (EDT)
Subject: Fw: Writing African Americans out of history

Sent from Yahoo Mail on Android

----- Forwarded Message ----- From: "Raab, L Mark" <raabl@umkc.edu> To: "warren watkins" <warrenwatkins@yahoo.com>, "Bruce Watkins" <brucewatkins007@gmail.com>, "Ike Francis" <ifrancis42@sbcglobal.net>, "annmraab@gmail.com" <annmraab@gmail.com> Cc: Sent: Thu, Sep 6, 2018 at 8:04 PM Subject: Writing African Americans out of history <!--#yiv2643845731 P {margin-top:0;margin-bottom:0;}-->
Warren, here is the press release version you asked for:

KCI Writes African Americans Out of History

Previous studies document KCI archaeological sites of extraordinary importance to African American and U.S. history. African Americans have declared the importance of these sites to their history and culture, including connections to figures like Bruce R.

Watkins. The airport's pending environmental study claims there are no minority groups with an interest in the airport's archaeological sites. This study also completely omits reference to the most important archaeological discoveries on airport land. The black community is effectively written out of history.

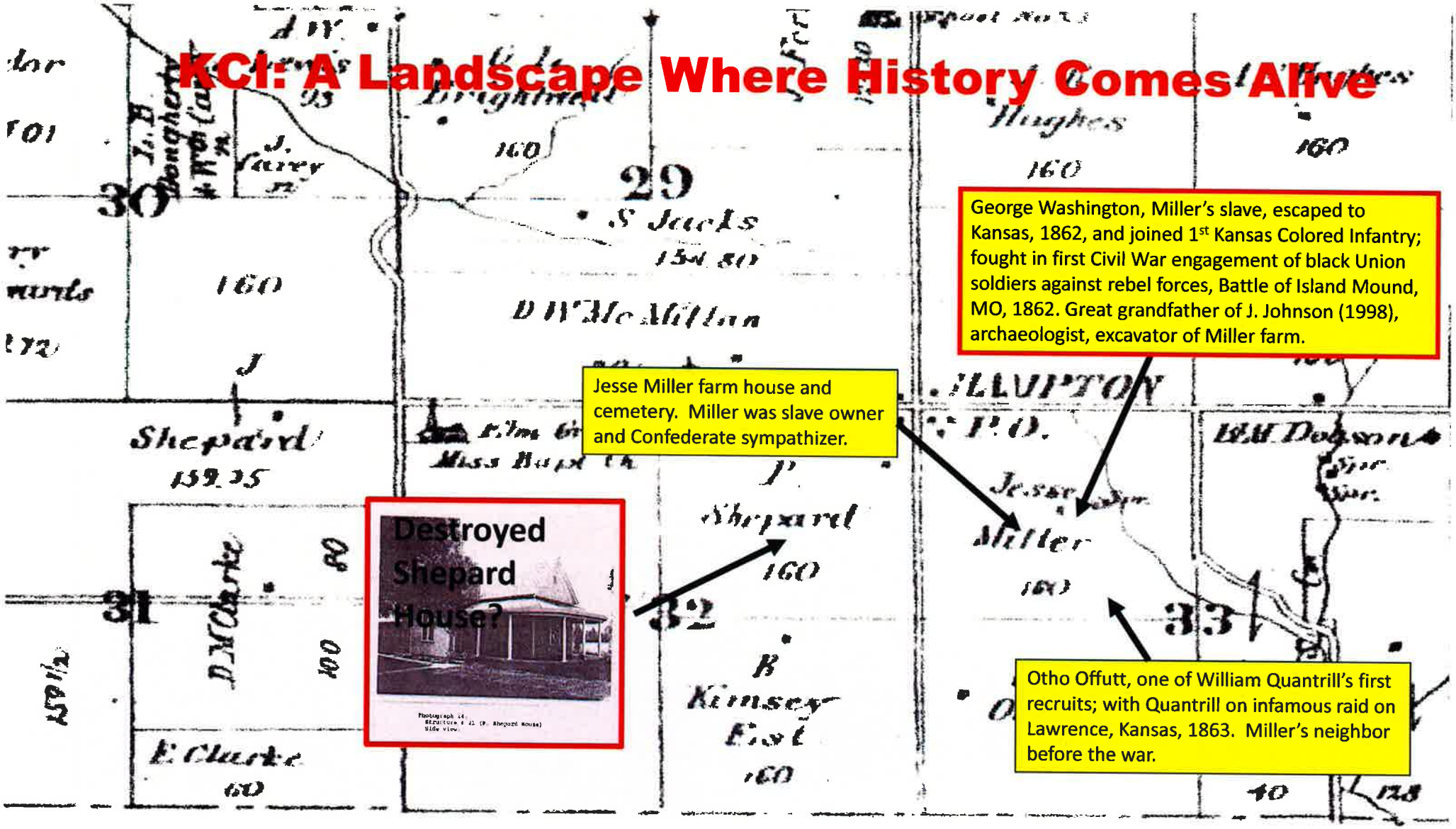
Why? Anger and arrogance. In 2008, the airport went to court for permission to dig up and move historic graves at the airport. Black and white descendants of the airport's dead mobilized and defeated KCI in court. The airport has not forgotten or forgiven this defeat. KCI is determined to weaken its opponents in any future legal battle. It can do this be denying African American descendants any standing in the pending environmental assessment.

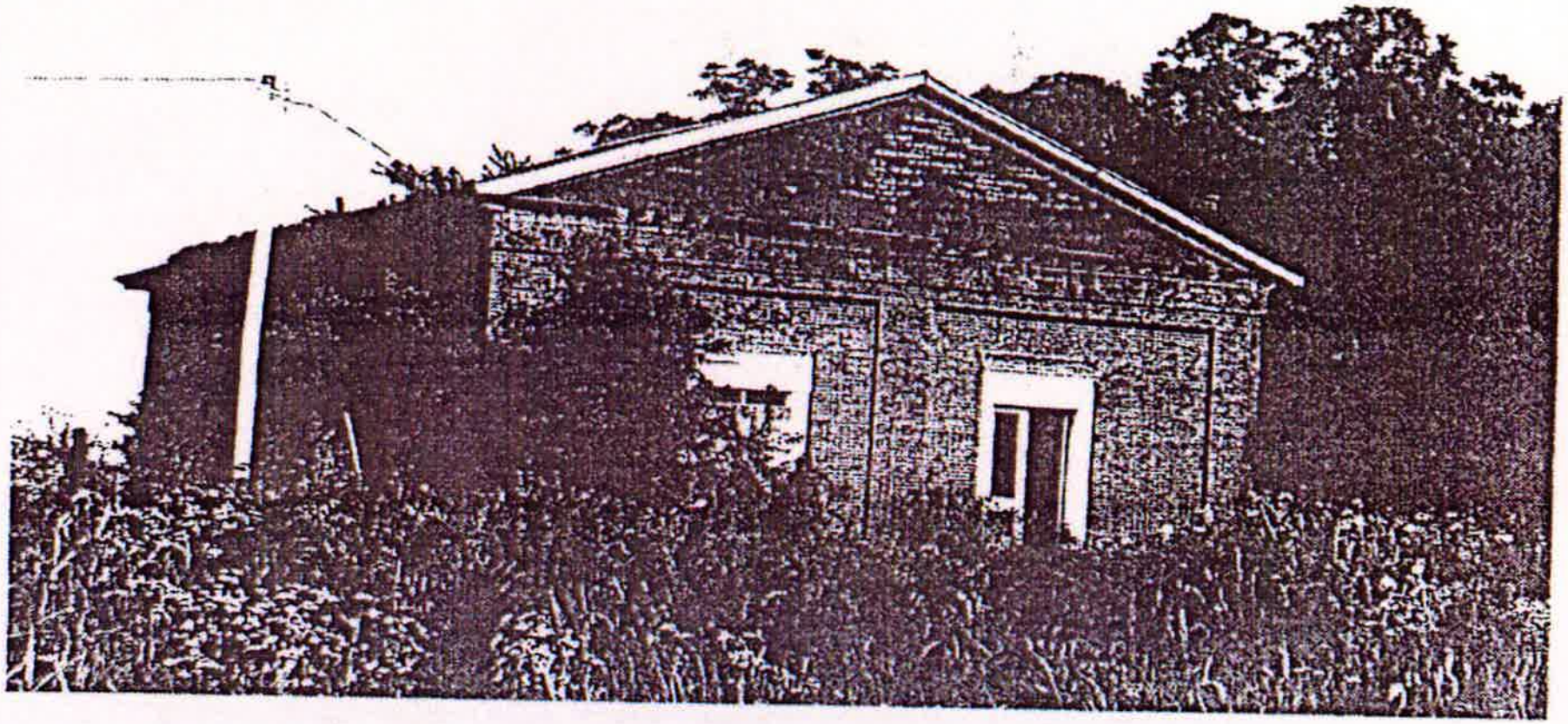
If you oppose this injustice, we hope you will make your views known. You must comment before October 2, 2018.

See the draft Environmental Assessment here: https://www.kci-edgemoor.com/documents/

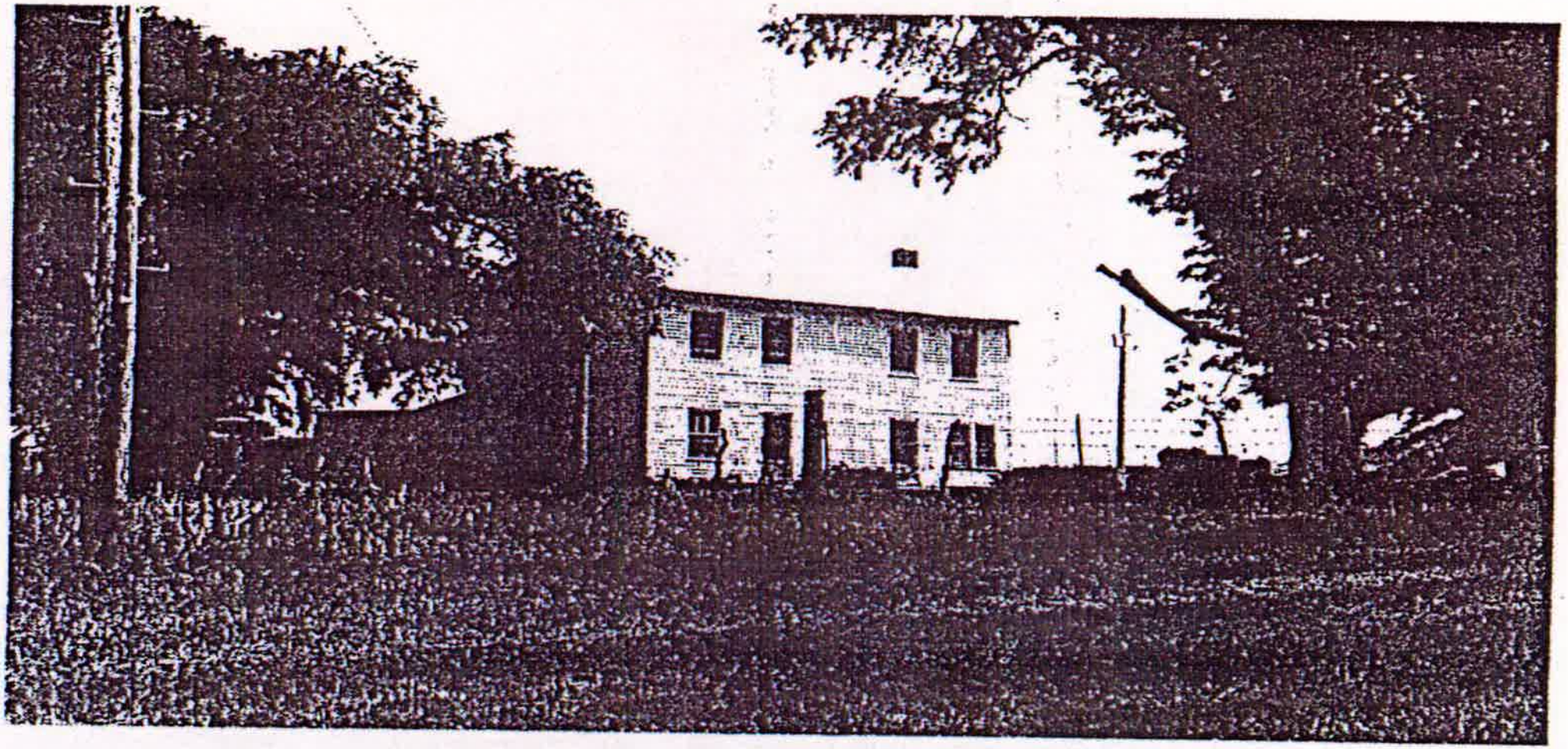
Want to make your own comments? Send them here: KCIEAcomments@landrum-brown.com

KCI: A Landscape Where History Comes Alive

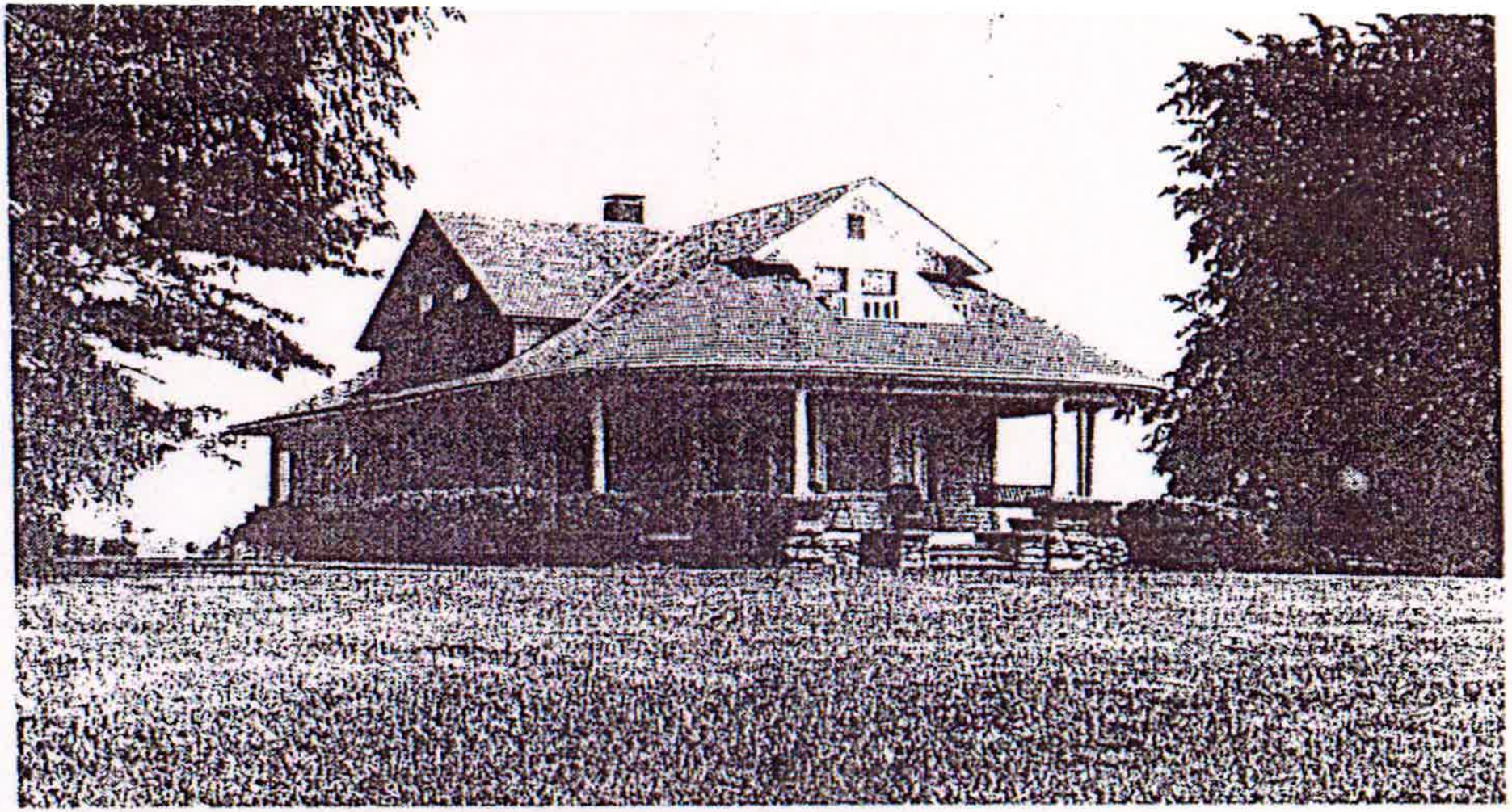




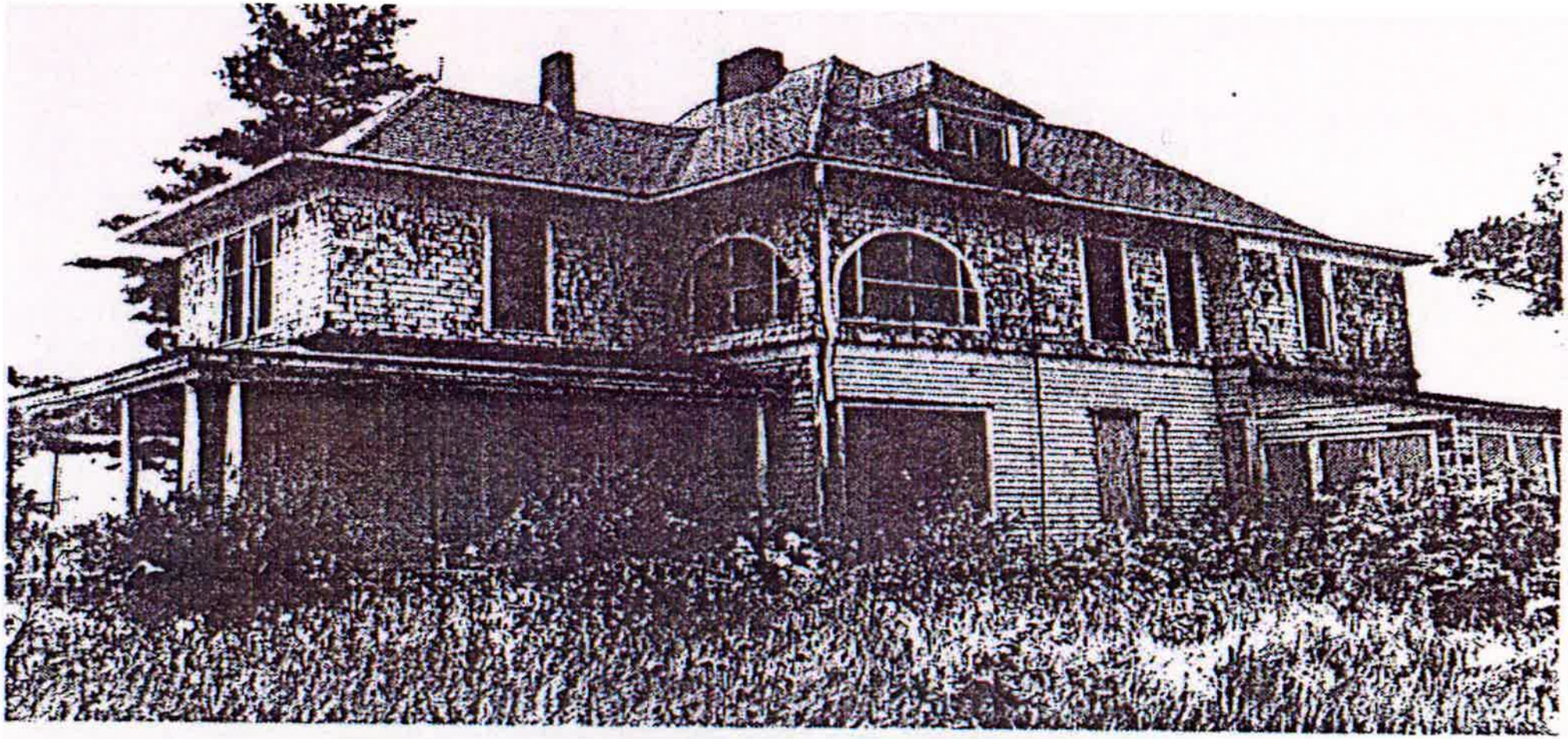
Photograph 12.
Structure # 17 (Elm Grove Church)



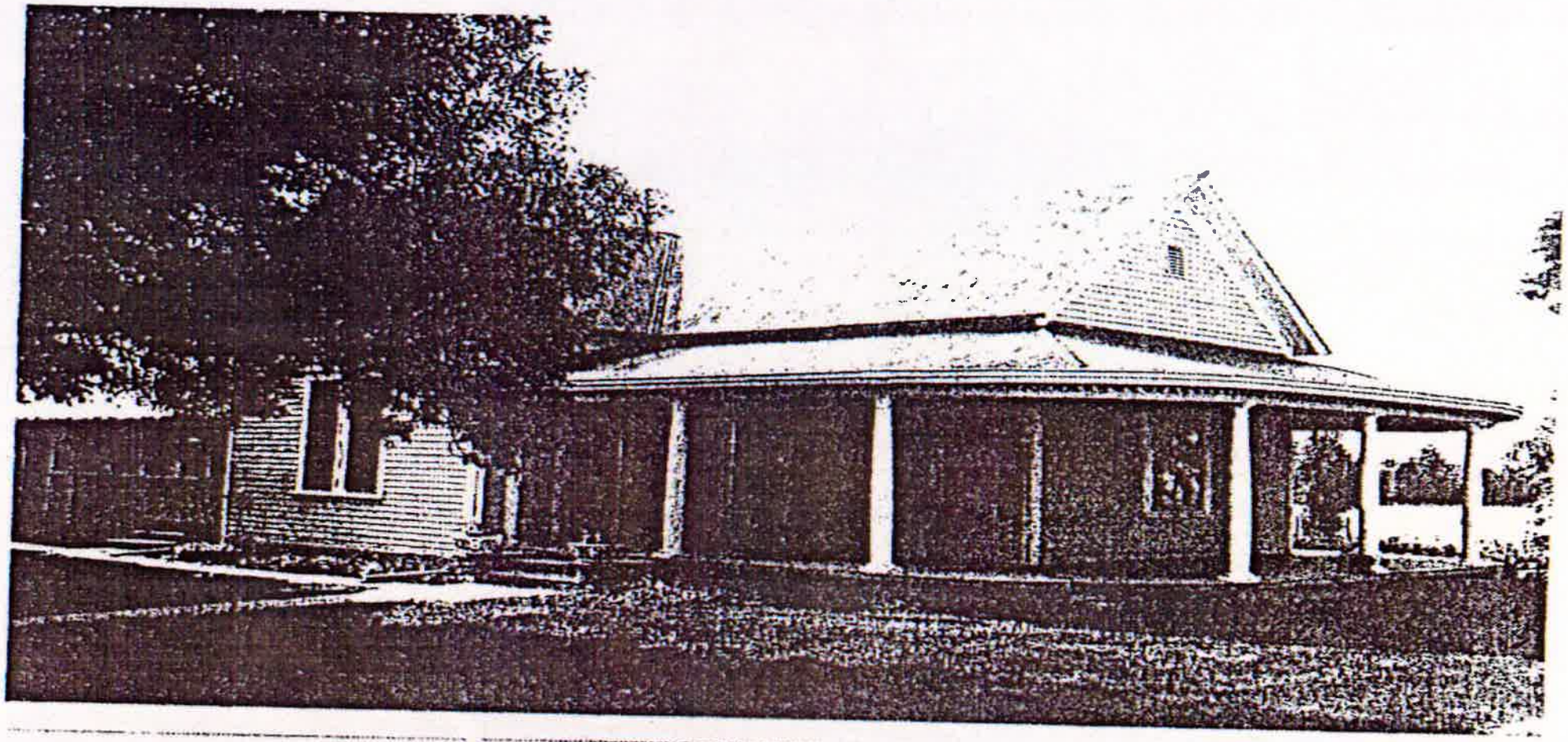
Photograph 10.
Structure # 10 (Fox House)



Photograph 11.
Structure # 11 (Hon House)



Photograph 7.
Structure # 3 (Lewis & Clark House)
Side with arched second floor sleeping porch.



Photograph 14.
Structure # 21 (P. Shepard House)
Side view.

Chris Babb

Subject: FW: Environmental Assessment at KCI for Single Terminal

From: Charles Cammack <cammackgeo@gmail.com>
Sent: Tuesday, September 25, 2018 10:51 AM
To: Madison, Todd (FAA) <todd.madison@faa.gov>; Pat Klein <Pat.Klein@kcmo.org>; cfrg123@gmail.com; Micheal Mahoney <mmahoney@hearst.com>; Dave Helling <dhelling@kcstar.com>; cat.reid@kshb.com; Mayor <mayor@kcmo.org>
Subject: Re: Environmental Assessment at KCI for Single Terminal

Hello Mr. Madison, Mr. Klein, et al,

KSHB reported today that Mr. Bruce R. Watkins, Jr., a descendant of slaves, has requested that the Environmental Assessment (EA) for the single terminal airport (STA) be amended to recognize the presence of graves holding the remains of slaves at the airport site. This information comes to him by word of mouth. I firmly believe that these hand-me-down stories hold truth.

I am an expert in geophysical engineering, at least to some extent, by virtue of my education (PhD in geotechnical engineering from Iowa State University) and engineering practice involving geophysical investigations. Here is my assessment:

Investigation by boreholes yield only scant information on the presence or absence of graves. One might be able to identify the soil as native (undisturbed) or fill (but probably not a grave fill). I hold that investigation by boreholes provides no value in this case. Ground penetrating radar will be of little or no value in the quest to find graves due to depth of penetration limitations. Electrical resistivity lacks the precision to identify small scale ground disturbances. Seismic investigations will be of no value.

P57

Most of these technologies came into existence within the last 50 years, and have only come into common practice in the last 25 years. The future may provide technologies that dazzle us, but they are not here today.

Aerial photograph interpretation can sometimes be used to locate graves, but current infrastructure masks any signs of ground disturbance. Aerial photographs taken prior to construction might be useful. Sources of these old photographs include EROS (Earth Resources Observational Satellite) located in Sioux Falls. There is also a repository in Colorado that contains even older photographs. **I recommend that the EA investigation be extended by including an analysis of historic aerial photographs.**

P58

One of Mr. Watkins' complaints is that KCMO and KCAD denied him a voice in discussions about KCI prior to the election. I have the same complaint. Mr. Klein reported to me verbally that he had received six renovation plans from 3rd parties including my own ALT 30 renovation plan, yet none of these plans were presented to the public in a proper manner. If this project moves forward, it will teach other politicians

and administrators that success (advancement of their plans) will be furthered by not presenting information and challenges from 3rd parties. This is a bad practice. Politicians and administrators should be taught that their plans can only be advanced if 3rd party information is made readily available to the public. This could easily have been done by placing 3rd party information on KCI's www.flykci.com website and by making its presence known to the public.

The FAA and TSA probably cannot kill the STA project for the sole reason of lack of voice, but they can end the project because the STA plan will:

- Move 1/2 of all KCI passengers 100 to 1,000 feet closer to an active runway where danger is present in the form of aircraft moving at 140 mph
- Position aircraft very near the active runway and inline with the far concourse
- (previous accidents at KCI and other airports, translated to one runway at KCI, fall dangerously close to the far concourse)
- Congest airside traffic and lead to collisions between taxiing aircraft
- Include only one security checkpoint, a feature considered obsolete in Europe
- expose KCI to OKC-type terrorist attacks that kill and maim hundreds and leave the airport inoperable for months
- Force drivers onto a more dangerous, temporary, convoluted roadway having two-way traffic and two roundabouts in series
- Prevent emergency vehicles from reaching, or moving from, terminals B and C during construction

Under my renovation plan, ALT 30, all of these dangers are neatly avoided, yet KCMO and KCAD refused to make the renovation plan known to the public.

Many people in KCMO hope that the STA project will prove to be enabling and transformative. Enabling means training and education to me. Transformation in this case means making people taxpayers. The FAA is struggling to justify the CBA programs associated with the STA. What concerns me is that, if the STA plan is implemented, the increased cost airline tickets will put air travel out of reach of many poor people. We need a CBA program that is enabling and transformative that does not dramatically increase airline ticket prices.

Under ALT 30, training provided during renovation of Terminal A will be put to use during construction of Terminal B (and perhaps C). The FAA will be better able to approve CBA programs developed under those conditions. There will be only slight ground disturbance, so no graves will be disturbed. Technologies developed in the future may make it possible for us to locate graves provided that the ground is not disturbed today.

Mr. Klein, please have Edgemoor send this information to Mr. Watkins, and please report that transmission to me. I would like for Mr. Watkins to call me to discuss this issue.

Charles H. Cammack, PE, PhD
President, Cammack GeoConsulting, PA

7911 Darnell Lane
Lenexa, Kansas 66215

Tel: 913-730-8646
Cell: 913-660-3719

COMMENT FORM
PUBLIC HEARING
KANSAS CITY INTERNATIONAL AIRPORT
ENVIRONMENTAL ASSESSMENT, SECTION 106 REVIEW, AND SECTION 4(F) STATEMENT
September 24, 2018

This comment form is provided to receive your input and ensure that your comments are considered. Please use this form to submit written comments. Either place the form in the comment box at the Public Hearing, or mail to the address below not later than 5:00pm Monday, **October 2, 2018**.

Before including your name, address and telephone number, email or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information - may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Its about damn time we got to this point. Having done EAs & EIS's for 30 years, the MCI terminal plan and its environmental effects have been shown numerous times to have zero significant (and virtually no insignificant) impacts on the environment – evaluations that have been accomplished several times during the last ten years. The terminal plan will provide benefits throug significant improvements, t (OVER)

P59

Submit comments to:

Chris Babb
Landrum & Brown
11279 Cornell Park Drive
Cincinnati, OH 45242

FROM (Please Print):

Name: Jon M Woodward

Address: 2113 G 26th Terr
Lawrence, KS 66046

The efficacy of traffic, security, and commercial enterprise within the terminal plan. While the three horseshoe plan has been a trademark of KCI for fifty years, subsequent changes in security have rendered everything from bathrooms to newsstands to be inefficient in the current layout. I heartily endorse the new plan

Fold Here

Place Stamp Here

Chris Babb
Landrum & Brown
11279 Cornell Park Drive
Cincinnati, OH 45242

Fold Here

COMMENT FORM

PUBLIC HEARING

KANSAS CITY INTERNATIONAL AIRPORT

ENVIRONMENTAL ASSESSMENT, SECTION 106 REVIEW, AND SECTION 4(F) STATEMENT

September 24, 2018

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I would assume no issues since it is built on & an existing site. Glad to see new detention area for deicing. Appreciate the public input opportunity but am eager to see KCAS move forward with the projects ... price of materials is not decreasing.

P60

Submit comments to:

Chris Babb
Landrum & Brown
11279 Cornell Park Drive
Cincinnati, OH 45242

FROM (Please Print):

Name: Alicia Stephens

Address: 11734 NW Plaza Circle
KCMO 64153

Press Release

KCI Writes African Americans Out of History:

Previous studies document KCI archaeological sites of extraordinary importance to African American and U.S. history. African Americans have declared the importance of these sites to local history and culture, including connections to figures like Bruce R. Watkins. The airport's pending environmental study claims there are no minority groups with an interest in the airport's archaeological sites. This study also completely omits reference to the most important archaeological discoveries on airport land. The black community is effectively written out of history.

P61

Why? Anger and arrogance. In 2008, the airport went to court for permission to dig up and move historic graves at the airport. Black and white descendants of the airport's dead mobilized and defeated KCI in court. The airport has not forgotten or forgiven this defeat. KCI is determined to weaken its opponents in any future legal battle. It can do this by denying African American descendants any standing in the pending environmental assessment.

If you oppose this injustice, we hope you will make your views known. Comments must be submitted before October 2, 2018 to: KCIEAcomments@landrum-brown.com

See the draft, Environmental Assessment here: https://www.kci-edgemoor.com/documents/

Contact: **Warren R. Watkins Jr., The Watkins Foundation**

(816) 547-9905 warrenwatkins@yahoo.ciom

KCI's Nationally Important Archaeology: A Fact Sheet

Prepared by:
Watkins Foundation,
Kansas City Missouri
9-15-18

Why This Fact Sheet?

KCI is required by Federal law to evaluate archaeological sites known to exist at the airport. This is being done to get permission to build the new airport terminal. Several archaeological studies have been done on the airport's 53 square miles of land. Archaeological sites found by these studies were destroyed in a manner that broke Federal law. Other airport historical properties have been studied in detail by archaeologists. The report of these investigations is mysteriously missing from the airport's environmental assessment. This report documents these extraordinarily important discoveries. We summarize these discoveries below.

P62

What Was Discovered?

Archaeological excavations uncovered exceptionally preserved remains of early to mid-19th century farms that once existed at KCI. These subsurface remains included largely intact building foundations, basements and large deposits of associated artifacts:



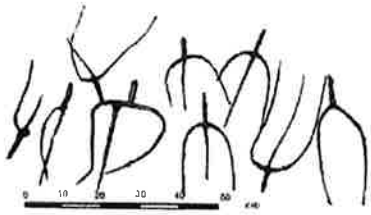
Photograph 14 Walker House Basement on North (view to east)

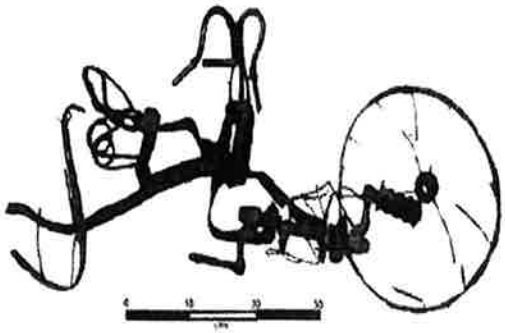


Photograph 51. Steps into Hoy House Basement addition



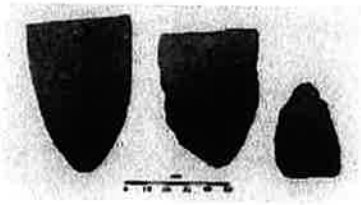






Photograph 33. Early Tricycle from Walker House







Photograph 21. Artifacts from Walker Slave House 1

Why Is It Important to Our City, State and Country?

- These discoveries embody the expansion of slavery and its associated social and economic ways of life to the mid-19th Century American frontier.

- These farms give us a rare glimpse into the way of life of two parallel social worlds: Wealthy hemp and tobacco farmers and the enslaved African Americans who worked their farms.

- In a rare state of preservation, these farms are "ground zero" for the Missouri-Kansas Border War that helped to ignite the American Civil War. (see http://www.freedomsfrontier.org/).

- Extraordinary personal stories of people who lived on KCI's farms: A runaway slave who enlisted in the first African American regiment to fight for their freedom in the American Civil War. Men who joined William Quantrill's raiders and their destruction of Lawrence, Kansas. Some of wealthiest and most influential women on the pre-Civil War American frontier.

- Direct descendants of slaves who lived on the airport's farms helped to build modern Kansas City, including the role of the Watkin's family in the city's commercial,

social and political history. (see https://kcparks.org/places/bruce-r-watkins-cultural-heritage-center/)

What Can You Do?

- **You have until Oct 10, 2018 to contact the airport and let it know:**

  -It's not acceptable to write history out of the airport's environmental assessment, including African American history.

  -The airport's archaeology and history are too important to local, state and national history to be ignored.

  -The airport's archaeology and history should become an educational resource for the region, state and nation.

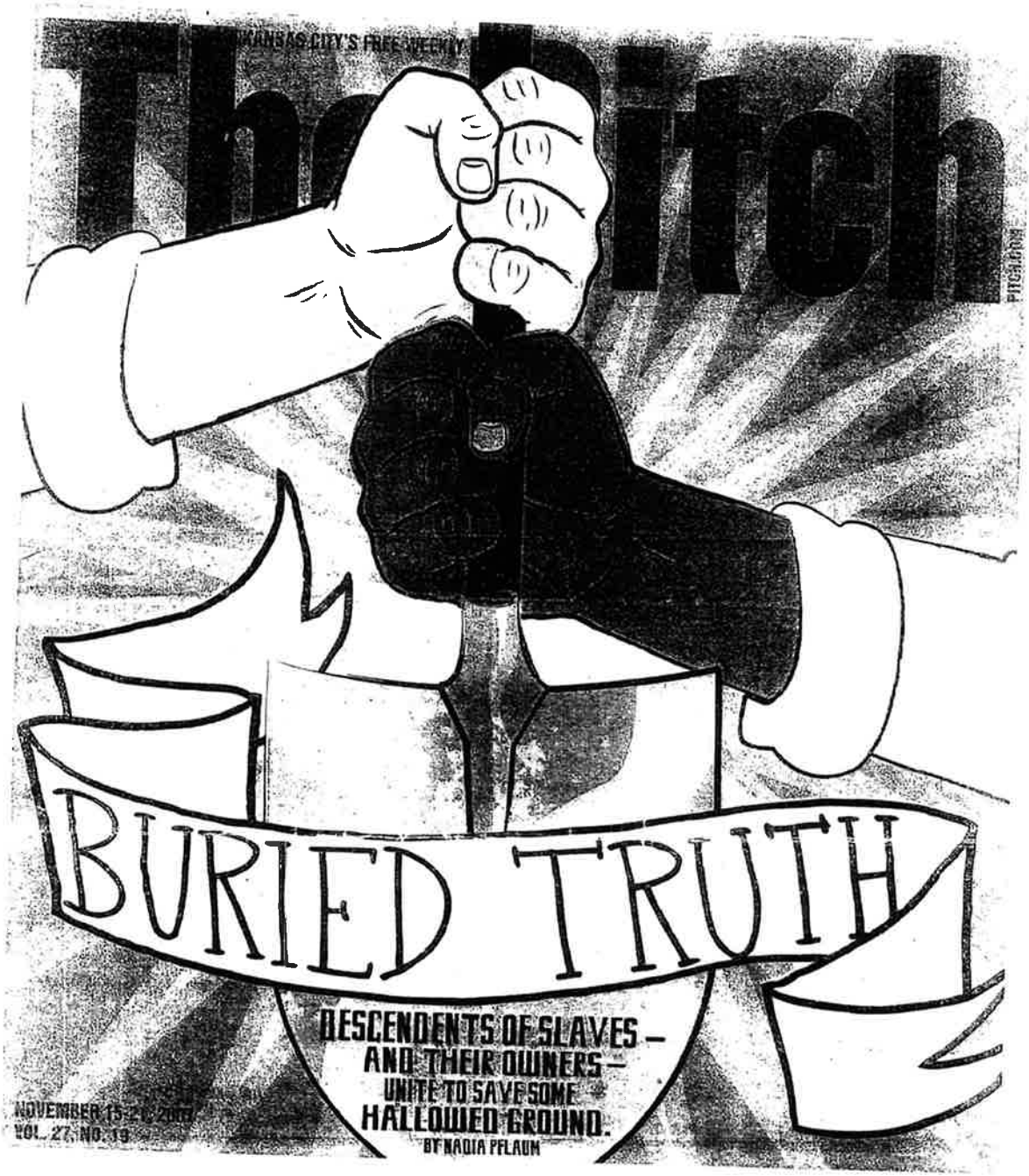
Make your views known:

Landrum-Brown, airport consultant: KCIEAcomments@landrum-brown.com

Missouri State Historic Preservation Office: Amanda.Burke@dnr.mo.gov

Want more Information? Contact:

Warren Watkins: 816-547-9905, warrenwatkins@yahoo.com


KANSAS CITY'S FREE WEEKLY
The Pitch
PITCH.COM
BURIED TRUTH
DESCENDENTS OF SLAVES –
AND THEIR OWNERS –
UNITE TO SAVE SOME
HALLOWED GROUND.
BY NADIA PFLAUM
NOVEMBER 15-21, 2007
VOL. 27, NO. 19

BURIED TRUTH

Up at the airport, under what's slated to be a private racetrack, no one's resting in peace.

It's been light for only an hour, but the Watkins Brothers Memorial Chapel [illegible] for business. In the back of the Cleaver II Boulevard complex, two new coffins, still shrink-wrapped in plastic, stand on rolling platforms in a concrete hallway. Later today, they will contain two of the community's recently deceased. For 98 years — four generations — this family-owned funeral home has buried the city's African-American dead. This morning, though, Warren Watkins Jr., vice president, embalmer and funeral director, has business concerning people who have been dead much longer.

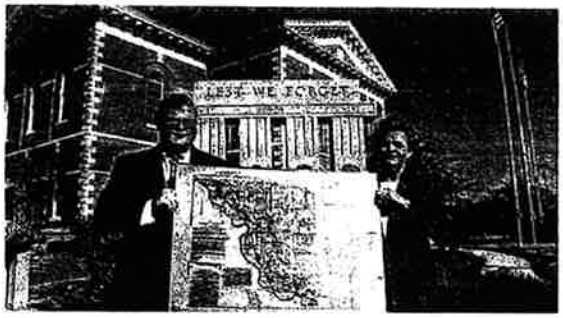
Watkins walks out the garage doors and unlocks a black Cadillac limousine. A regal-looking woman in an African-patterned dress follows, settling into the back as Watkins gets in the driver's seat, chauffeur-style. Soon, they're zooming out of the city, past the exit ramp for Kansas City International Airport, past the undulating hills where red-tinged trees grow in strips between fields, toward the Platte County Courthouse. They're rushing to pick up Lillie Jackson, a woman in her 80s, in time for a 9 a.m. hearing. There, a judge will determine whether Watkins and an archaeologist are allowed to dig on the airport's land for what they think is concealed by tangles of underbrush and a few heavy red stones: the remains of the slaves who built Platte County.

The soil around Kansas City's airport is similar to that in Virginia. Settlers from that part of the country came to Platte County in the 1800s, bringing their slaves with them. They nicknamed the area "Little Dixie" and planted crops of tobacco and hemp. The backbreaking work of tending the soil and cleaning the equipment was done mostly by slaves. Watkins' grandmother, who was born in Parkville, remembered that the names Tolson and Hughes — the names of their white slave owners — figured early in the family's genealogy.

"Parkville was freedom," Watkins explains as he turns the limo off the highway to a residential neighborhood of one-story houses spread among woody stands of trees. If slaves could escape to Parkville, they could make it to Kansas — the free state.

"The underground railroad started there, in Quindaro," Watkins says. "That's where they were hiding them. One real cold winter, you could walk across the frozen river, and if you could get to Parkville, you were good."

The regal woman in the backseat, Timberlyn Smith, speaks up. She's along for the ride after some friends in her book group read a newspaper article about the Platte County hearing and told her that she should attend. Smith is an environmental consultant and a biology instructor at Park University.



Olin Miller and Shirley Kimsey hold Kimsey's cemetery map.

"My white friends don't see, you know. You have to kind of educate them," she says over the noise of the road. "They say, 'You all need to get over it [slavery]. It's in the past. It's history. There's no problems now.' There is a discord between the races that we tend to try to glaze over because it's easier."

Watkins says, "We need healing. No more denying. Once you admit you have a problem, then you start dealing with it. Once we find one [grave], it just opens it up, and we'll keep looking till we find them all. For the first time, these people will be treated like human beings."

Watkins pulls up to a white-shingled house on a concrete foundation with a little white Ford parked outside. A stooped woman steps out with her cane, turns to lock her wrought-iron door and greets Watkins, whom she calls "Butch." With his help, Lillie Jackson crawls into the rearmost section of the limo and smiles out the window on the way to the courthouse.

Smith asks her what she thinks about their morning's activities.

"I don't know," Jackson replies slowly. "I got up this morning, and I said, I don't know what to think. I'm just going to be solid and ask God what is the right thing to do."

Watkins parks in front of the Platte County Courthouse, the centerpiece of Platte City's Main Street. Kansas raiders burned down the original courthouse, along with much of the town, in 1861, the first year of the Civil War. It was rebuilt and in 1933 was the site of the trial and conviction of Blanche Barrow, who ran with bank robbers Bonnie Parker and Clyde Barrow.

Watkins, Smith and Jackson file past uniformed guards, through metal detectors and into the courtroom, where the first hearing on the docket is that of a young blond woman, newly divorced, who wants her name changed. The attorneys for Kansas City's Aviation Department and Robert Shaw, the attorney representing the unknown people buried on a tract of airport property, wait for their turn in front of Circuit Court Judge Abe Shafer. Also waiting are half a dozen concerned citizens like Smith.

None of this would be happening if it weren't for luxury sports cars.

A businessman and auto enthusiast [illegible] Rick Watkins — no relation to [illegible] Watkins and the funeral-home [illegible] — and his partners in a com[illegible]lled FastTrack Group LLC plan to [illegible] a private motor-sports country club on a 300-acre chunk of city-owned property near the airport.

It would be a playground for Porsche and Ferrari owners who long to push their speedometers into the red. Construction is scheduled to begin in the summer of 2008 for a 2009 opening. Plans for the KCI Motorsports Park — naming rights are for sale — show manicured lawns surrounding two immaculate road courses that could be merged into one 3.75-mile circuit. Amenities, according to the track's Web site: a separate go-kart track, an exclusive clubhouse with views of the racing, a cafeteria and a pro shop. Flyover property near KCI seems perfect for the site, especially after planning officials from FastTrack's first choice in Miami County, Kansas, rejected the project in 2005 because of noise concerns.

It would be a playground for Porsche and Ferrari owners. The lowest price for a membership is $15,000 a year, preconstruction, for a motorcyclist. (The cost of a membership will go up after the track is built.) A single go-kart driver pays $35,000, which doesn't include access for his or her family. A better-heeled member who wishes to test the limits of his machine can pay $85,000 preconstruction or $100,000 postconstruction for a "founding membership."

Rick Watkins has not responded to *The Pitch*'s repeated requests for an interview, but, according to the Web site, work on the track "was moved back one year to allow the Aviation Department time to resolve a lawsuit unrelated to this project."

That lawsuit *is* related to the project, however, because if it isn't resolved, FastTrack can't break ground. Standing in its way are four marked pioneer cemeteries on the acreage. The city of Kansas City, Missouri, filed suit in Platte County Court on February 22, seeking

BY NADIA PFLAUM **PHOTOS BY MICHAEL FORESTER**

Fate Of 'Unknown' Slave Remains Entangled In Battle Between City And Descendants Of Slave Owners

By Domnick Hadley
CALL Staff Writer

The bones are talking.

And archaeologist Jimmy Johnson, Warren Watkins and a slew of Platte county residents hear them loud and clear.

The bones tell the stories of descendants who once occupied an area dubbed "Little Dixie", a hemp producing community that trailed the upper south and northwestern corners of Missouri.

The descendants, mainly white land owners, migrated from southern slave states including Virginia, Kentucky and Tennessee in search of cheap and fertile land, according to historical accounts.

But more important than the circumstances in which they arrived, now, is the history they left behind. A history which includes the lives of thousands of African American slaves.

Johnson, Watkins, and descendants of the land owners are in a fight with city government to halt development on tracts of land where four known homestead cemeteries exist.

Also at issue, are the unknown remains that Johnson and Watkins contend are those of slaves and Native Americans buried on the acreage.

Officials with Kansas City's Aviation department are seeking a court order to relocate remains from the cemeteries to a site near Tiffany Springs Park.

The graves would be moved to make way for future expansion of the Kansas City International Airport and KCI Motorsports Park, a "high performance motor sports country club" racetrack for high performance motor sport racing.

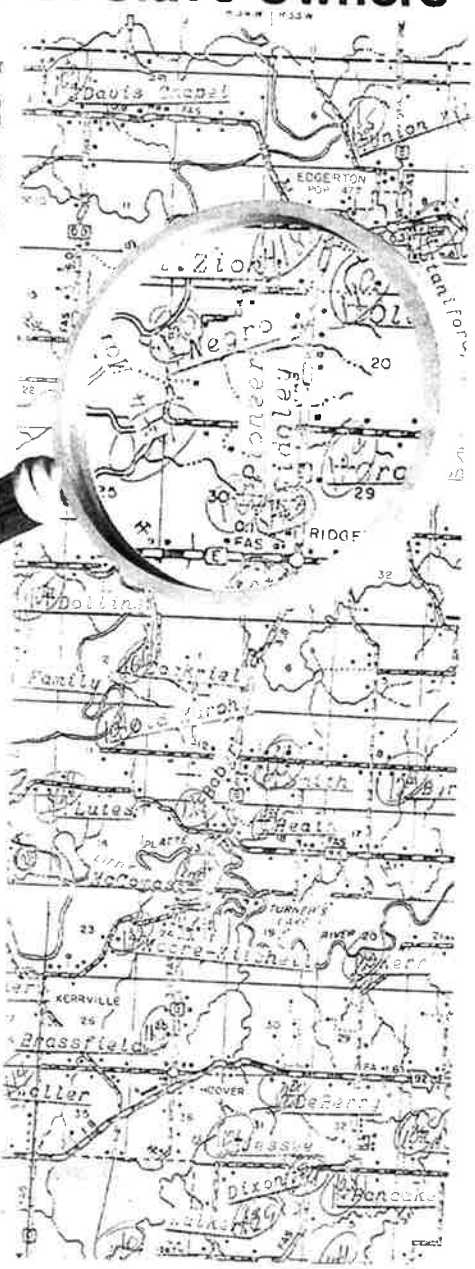
According to Assistant City Attorney Melody Cockrell, the unknown remains – those of the slaves and Native Americans – are no longer an issue.

Lack of evidence from a previous dig commissioned by Johnson erased the unknown remains from the initial petition, she said.

"Having no factual information, we removed the allegations of any slave remains being found," Ms. Cockrell said. "There is nothing for the court to do at this point."

But Robert Shaw, the court appointed attorney representing the known and unknown remains, along with Johnson and Watkins, argue otherwise.

And, they are taking steps they believe are necessary to ensure that the history of all descendants, slaves and slave owners, remain undisturbed.



The Beginning

Johnson's road to discovery began in the mid 1980s.

As a child, Johnson's grandmother would recount stories of his great grandfather, George Washington – a slave in Platte County, Mo.

Washington was a slave of the Miller farm, a hemp farm located in the southeastern regions of Platte county.

Washington, lured by hopes of freedom, crossed the frozen Missouri River in 1862 to Quindaro, Kas. Following his escape, he joined the First Kansas Colored Volunteer Infantry Regiment to fight for the union during the Civil War.

Those stories fueled a quest to uncover the history his grandmother had once vividly described to him.

That quest led him to the historical archives in Platte county in search for anything he could find about his great grandfather.

"I remember my grandmother telling me that George Washington didn't cross the Potomac, he crossed the frozen Missouri river," Johnson said. "This was the most interesting story I ever heard in my life. In the mid-1980s, I said, 'wait a minute. If he was a slave in Platte county, I'm an archaeologist . . . maybe I can find where he was manumitted – where he was a slave."

Johnson's quest for knowledge proved successful.

His research revealed Washington's slave owner was Jesse Miller, the husband of Margaret Waller – who originally migrated from Virginia with her first husband, Lewis.

Continued on page 4

Event Presents Continued from front page

law of land but it wasn't right. We take incremental steps to heal the past. And this was one of them."

Johnson, a local archaeologist, shared the same sentiments.

Johnson's great grandfather, George Washington, was a slave on the Miller farm –one of the hemp farms that dominated the region.

Tracing through historical archives and forming friendships with descendants of Washington's owners, Johnson was able to compile a 60-page report chronicling the history of the area.

Johnson, who spent years sifting through artifacts on the acreage, said he never imagined that so many people would unify to preserve the area's history.

"That's my great grand daddy's slave owner," Johnson said, pointing to a century old headstone bearing Jesse Miller's name. "I am extremely humbled to see this group of people at this remote site. I never thought in 10,000 years I'd see people (celebrating on this tract of land. This is good stuff."

"We stand together, today, to pledge to you (our ancestors) that we stand today as partners, we the living amongst ourselves and we the living to you the forgotten," said Oralee Watkins, a descendant of slaves believed to be buried on the site. "We stand together today to tell you these changes, progress and fulfillment of democracy's promise came about because our shared belief in the sanctity of life, and in our fundamental love for each other and ourselves.

"We each may bear different pastors, but in community, we act together," Ms. Watkins continued. "We each may celebrate a universal power at different times, and in slightly differing traditions, but in community we are one."

Ms. Watkins has filed a civil lawsuit against Mark VanLoh, director of the Kansas City's Aviation department, seeking punitive damages for his alleged violation of federal laws and statutes concerning the disinterment of human remains.

Regardless of what legal battles lie ahead, UMKC professor Mark Raab sees the stories of those buried on the acreage as launching points to creating a dialogue about America's flaws.

"There are stories here both black and white that are part of America," Raab said. "America is not a finished product. The border wars are over, but we've got a long way to go to make America better place to live."

permission to remove all of the remains from these cemeteries and reinter them in a centrally located fifth cemetery not in the path of development.

The real holdup is the unmarked slave cemetery.

Warren Watkins, Jackson and others are sure that it's on that same 300 acres. Shafer appointed Shaw to represent these unknown dead, and today, at the Platte County Courthouse, Shaw is asking Shafer's permission to go digging for them.

Lowell Gard, an attorney for the city, steps up to his lectern and complains to Shafer that the city already hired an archaeologist, Craig Sturdevant, who drove a backhoe into one of the areas thought to be the slave cemetery, dug and found nothing, at a cost of $5,000. Shaw wants any new excavation to be done quickly and wisely, "so we don't spend another several months just prospecting."

Gard adds that he has doubts about dowsing. Sometimes called "witching" or "divining," the practice involves walking over an area with a metal or wood rod held parallel in each hand; when the rods cross, they supposedly indicate the presence of water, metal or other objects underground. Platte County cemetery sextons and amateur historians use the method to locate underground graves. "The scientific basis for it, I think, is nearly nil," Gard says.

Shaw replies that Warren Watkins and others don't want to search the entire 300 acres, only a small, specific site identified through locals' stories, dowsing rods, and deliberately placed red rocks thought to mark the graves. The city won't spend a dime, Shaw explains, because there is a volunteer archaeologist willing to do the work for free.

Shafer grants Shaw's motion to let an archaeologist check out the site, provided that the work is completed before December 10, the next scheduled court date in the cemetery matter.

When the hearing ends, the benches empty and a small group convenes in the courthouse hallway. Warren Watkins explains the court proceedings to Jackson, who couldn't hear.

"They want to move it, but after so many years, I wonder if they know what they're doing," Jackson says.

Jackson and her 104-year-old aunt, Katharine Mace, remember Mace's great-grandmother, who was born into slavery and was buried somewhere in Platte City. She was missing a leg but could still ride a horse. "She sat in a rocking chair, and she was good, as far as her mind was concerned, but she couldn't walk so well because they'd mistreated her," Jackson says.

Standing just outside the courtroom doors is a gray-haired woman with a stick-straight back and a rolled-up cemetery map clenched under one arm.

Unlike the city's maps, Shirley Kimsey's includes a tiny square marked "Slave Cemetery." Kimsey says representatives of the State Historical Society of Missouri told her that she knows more about Platte County's dead than anyone in their office. People who visit the courthouse for historical information are directed to Kimsey's clothing shop, called Shirley's Fashion Center, across the street from the courthouse. Near the dressing rooms, she keeps a microfiche machine with articles dating back to 1871.

Platte County planners asked Kimsey to use her dowsing rods to determine the placement of unmarked graves before a cell-phone tower was erected on land near a cemetery.

"I think they're full of bull," Kimsey says of the city's attorneys. "Cemeteries all over the United States use witching rods."

Kimsey would prefer that none of the graves on city land be disturbed. She's not against progress, but she doesn't trust the city to care properly for the graves that stand in the way of development.

"I don't care what color, what race or anything else they are," Kimsey says. "Leave my dead people alone."





Above: Katharine Mace, whose maternal grandmother was born a slave, will celebrate her 105th birthday this month. Left: Ernestine Mace, Katharine's daughter.

It's hard to imagine early pioneers resting in peace on airport land. The intermittent roar of jet engines is sometimes so loud, you can't hear your own footsteps crackling over sheared acres of cornstalks and brush.

Kimsey has traipsed over this property and many other parcels, documenting 216 of Platte County's 220 cemeteries. Her interest began when she looked up the genealogy of her family and learned that her great-grandfather came to Platte County from Virginia, riding shotgun on a wagon train when he was 18 years old. He registered for 80 acres to farm and rode back to Virginia on horseback to fetch the rest of his family.

She married into the Kimsey family. One of her late husband's relatives, Benjamin Kimsey, was a Platte County farmer who acquired the land in 1843 and owned four slaves, according to old census data. Another relative, Wade Hampton Kimsey, worked for a monument company and placed many of the tombstones in the Platte County Cemetery.

Starting in the 1970s, Shirley Kimsey tended to the graves of these Kimseys, and perhaps 20 others, at least twice a year. The cemetery was deep into the fields, so the farmer who owned the land let Kimsey jump on the back of his tractor, and he took her there himself.

Kansas City acquired the acreage in the 1980s in order to build up the area surrounding KCI. The city leased the land to farmers while waiting for development to catch up to it.

By 1990, a different farmer leased the property, and Kimsey says she noticed that earth-moving equipment had been creeping closer to the plots. She contacted the Aviation Department and asked the person in charge of the city-owned farmland to make sure the cemetery was protected.

In May 1992, some distant relatives of Kimsey's husband came to visit and asked for a tour of the Kimsey cemetery.

"Well, we get down there, and — wait a minute, am I on the wrong hill?" Kimsey recalls. "And so I looked in both directions to see whether I'm in the wrong place, and, well, I'm not. Finally, I see this one tree has been left, and little Nancy's tombstone is lying against this tree. All the rest of the tombstones are gone, and all the rest of the trees that were around there are gone ... well, I will guarantee you that I came unglued."

The next year, an archaeologist named Jimmy Johnson came to Kimsey's shop. He'd been researching landholding archives in the courthouse when a clerk suggested that he cross the street and seek her help.

Johnson told her that his great-grandfather, who'd taken the name George Washington, was a slave in Platte County during the 1840s and 1850s. He said he learned through stories told by his grandmother that when Washington was a year old, he was given to farmer Jesse Miller and his wife, Margaret Jones-Miller, as a wedding gift from the bride's father.

Washington's master, Jesse Miller, was a Southern sympathizer in the years leading up to the Civil War. In April 1855, Miller took part in a raid on a newspaper in Parkville called the *Luminary*, the Boston-born publisher of which, George S. Park, printed editorials arguing that slavery was bad for business and that Kansas should join the Union as a free state. According to W.M. Paxton's *Annals of Platte County, Missouri* (a history of the families that settled in Platte County in the 1800s — local historians call it "the Bible"), Jesse Miller and a crowd of others stormed the *Luminary* offices, scattered the press's type up and down Main Street and threw Park's press into the Missouri River.

In the winter of 1862, with the Civil War under way, Platte County's slaves were escaping into Kansas, and the now-grown Washington was among them. He ran from the Miller hemp farm, crossed the frozen Missouri River and joined the 1st Kansas Colored Volunteer Infantry Regiment to fight for the Union. He survived the battles and, after the war, married another ex-slave and used the money he'd earned as a soldier to buy land in the Wakarusa valley outside Lawrence. He raised a family there and died in 1931.

Johnson told Kimsey that he was planning to complete an archaeological study of the Millers' farmhouse, and he wished to meet the descendent of his great-grandfather's master, Gordon Miller.

Kimsey knew Gordon Miller. He was a retired insurance executive with his own company. The office was just down Main from Kimsey's shop.

Kimsey was nervous about telling Miller the news. Old sentiments persist in some parts of Platte County.

"It used to be that if you even mentioned a black person around Gordon, he'd take your head off," she says.

But Miller surprised Kimsey. She says he told her, "'All my life, I've been told how I'm supposed to feel about colored

continued on page 14

continued from page 13

people. But I woke up one morning and I thought, Gordon, what has a colored man ever done to you? Nothing.'" He agreed to meet Johnson.

Johnson says his friends call him Indiana Johnson because of his style; he wears a fedora, drives a black Jaguar and speaks precisely, with swagger. In the introduction to his report on the Miller plantation, Johnson wrote of meeting Miller, "It was an emotional experience ... and a tremendous amount of recollection took place. After a few hours of conversation, we all became very good friends."

They talked on the phone every day. Johnson says he and Gordon were as

he came to her shop and said, "Shirley, I know we're not always in agreement, but there's one thing I know we will be in agreement on, and that is, down by where I live and where I was raised, there is a slave cemetery, and I don't ever want to see it destroyed." She says he showed her the place on her cemetery map and marked it with a pin.

"There is something about that slave cemetery," Kimsey says. "People who lived in that area have a protective feeling about it. And I don't know why. Maybe they felt guilty about it. Not being proper headstones and such as that."

Another person felt protective of the slave cemetery: Gordon Miller's son, Olin Miller, who took over the family insurance business on Main. Miller helps care



History detectives Warren Watkins, Jimmy Johnson and Olin Miller (left to right)

much like family as any two unrelated people could be.

"We were supposed to collaborate on a book until he cut grass one afternoon, sat to rest under the shade of a tree and never got up." Miller died of a heart attack.

In 1998, KCI officials gave Johnson permission to dig on the Miller plantation. The Missouri Department of Natural Resources' Historic Preservation Program supplied funding for the project. Johnson dedicated the work to the memory of his friend. A handful of Boy Scouts helped him unearth artifacts. Among the items recovered from the Miller root cellar was a handmade iron bolt that could have been used to tie up horses — or slaves.

According to Johnson's report, after Washington escaped, Jesse Miller chained his remaining slaves in the cellar at night in order to avoid losing any more. After the war, Miller tried through the federal courts to recover $500 compensation for his runaway; it's not known whether he collected.

Now, nearly 10 years after Johnson's work at the Miller plantation, he has returned to excavate the area that Kimsey is sure is the slave cemetery. She says she knows because old-timers who were raised in the area told her about it.

Kimsey recalls one elderly man whom people called "Red." She once argued with him over a Platte City proposal to move the courthouse. One day

for the Miller-Rixey Cemetery, one of the four cemeteries at the airport, and he learned how to dowse for graves from Kimsey.

In May 2006, the Aviation Department notified descendents, including Olin Miller, of the city's intention to move four cemeteries. When Kimsey suggested that the racetrack might also threaten an unmarked slave cemetery, Miller pulled together a search party.

Last February, Miller and his crew visited the Brightwell Cemetery, a tiny, fenced pioneer graveyard on airport property where several tall obelisks date back more than 100 years. "We went out and walked the fence line where they said the cemetery was located. We walked that fence line 400 yards ... at the bottom of the hill, we started finding red granite rocks. Three of us pulled out witching irons and walked the area, grave-dowsing, and began locating graves, and many of them had red-granite rocks at the head of the grave. We had what appeared to be three rows of graves, but the area was so overgrown with small trees and shrubs, even though it was the dead of winter, we had to walk deer paths and cattle paths to get through it."

They thought they'd found about 80 graves. That got Olin Miller thinking. "How many descendents are there, of slaves in the area, who have no idea that they're related?" he says. "Back then, slaves were not schooled. They marked their names with an X ...

sus, there's no ..., no church records, nothing to fall back on. Anything prior has to come from what grandparents told parents."

He wanted to somehow notify African-Americans all over Kansas City, in case their families' oral traditions hinted at relatives buried in Platte County.

Miller called the Bruce R. Watkins Cultural Heritage Center in Kansas City, a museum dedicated to the African-American experience and named for Warren Watkins' late uncle Bruce, who in the 1960s was the first black politician to serve on the City Council. A secretary connected Miller with Warren Watkins, who started looking for other descendents.

One other thing was bothering Miller.

"Not until the city filed their lawsuit did we really, formally learn exactly what they wanted to do," he says. "They never would specifically state why they wanted to move the cemeteries, except for the general welfare of the city of Kansas City. When we found out it was for a racetrack — we don't have a Porsche 560 we can go out here and race. We have a car we're content to buy gas for and wondering how to buy the next round of gas. Now these folks want to put a gentlemen's racetrack out here, which most of us will never have the opportunity to set foot on."

Mark VanLoh, the director of the Aviation Department, says the racetrack is good for the city. "They're [FastTrack Group LLC] paying us rent," he tells *The Pitch*. "They took the land as is. It's a lot of rent, too — if I recall, it's approaching $300,000 a year. It's a pretty brilliant plan, I think, for raw land."

After the court granted permission to dig for the slave cemetery, Johnson, Warren Watkins, Kimsey and Miller decided on a date: November 3. The weather was to be sunny and unseasonably warm.

That Saturday morning, Johnson and Miller set out for the dig.

The sign by the country road reads, "KCI Motorsports Park: Future Home."

The undeveloped acres feel solemn in the morning sun. Not far from here, a farmer has taken care to plow around a stand of trees near the on-ramp for the airport. The trees conceal some bricks — all that's left of the Red Crown Tavern where Bonnie and Clyde hid out and eventually engaged in their infamous shootout with Platte County Sheriff Holt Coffey. Sometimes all that preserves history around

other step disturbs grasshoppers with black wings. Sparrows wheel overhead. The fall wind bends the shoulder-high grass, making it sound as if someone is walking through the field, just out of sight. For a few moments, it's possible to forget the prairie's loud neighbor; the only reminder of the nearby airport is the gray top of the control tower peeking above the blond-and-green hills.

Johnson parks his black Jaguar just past the swinging metal cattle gate at the beginning of the country road leading to the Brightwell Cemetery. He jumps into Miller's rickety yellow truck full of equipment. A friend of Miller's is

already ahead, waiting with a backhoe to sift through the first meter of dirt.

As they bounce over paths of smashed grass, Johnson suspects they should be digging in a different location. Despite the insistence of oral tradition, Miller's and Kimsey's witching rods and the red stones lined in formation, he has doubts.

A quarter-mile past the stone obelisks of the Brightwell Cemetery, they expect to find a handful of locals and some representatives from the airport. Instead, they find a cavalry.

City trucks and cars line the path. Two attorneys for the city and six airport police officers are waiting. The officials are here to keep out anyone not directly involved with the excavation (including a *Pitch* reporter).

Cadillac (no funeral-home limousines today). Two more cars have followed him in, full of cameras and video equipment to document the scene.

When Kimsey arrives, her car packed with coolers full of sandwiches, airport police officer John Martinez grills her about the coolers' contents. She offers to let him search them, but he relents and lets her through.

Descendents arrive from each of the four threatened cemeteries. An airport police officer questions Bob Werline, a descendent of pioneers at Brightwell, about the person sitting in his truck. He says she is his wife — "Or, at least, she was when we left the house."

Later, Johnson will say he was surprised by the heavy security. Then again, folks are always curious about his work. "Everyone wants to go on an archaeological site. Everyone wants to get a glimpse of the grinning skeletons. You might find a pot of gold. Tutankhamen's arm might be there. Everyone thinks it's a glorified adventure. But it's a lot of work."

For this dirty job, Johnson wears a KU sweatshirt and, rather than his customary fedora, a backward-turned KU cap. Miller's pal Russ Statler operates the backhoe, taking bites out of the dirt and spitting them out slowly as Johnson watches, looking for remnants of a wooden box or pieces of hemp that might have covered the bodies of the dead when



Descendents of Platte County pioneers gather in the lobby of the Watkins Brothers funeral home.

Johnson stops the machinery. The gathering of cops, lawyers and locals goes silent and waits for his word. If remains are found, Warren Watkins has plans to receive them at the funeral home and hold onto them for DNA sampling and eventual reburial.

"Ladies and gentlemen," Johnson announces, "No one lives here. Let's cover it back up."

"Just another foot," Miller suggests. But it's not to be.

Later, Johnson will explain, "Two things happened: We either dug in the right cemetery in the wrong place, or the old oral tradition was incorrect and the coordinates were wrong. My gut feeling is, some farmer just took those stones and moved them out of the way so they could plow their crops."

Not finding anything is good, too, Johnson says. He figures he has until December 10, the court date when Shafer will decide the fate of the cemeteries, to craft a legal brief asking permission to dig in another spot. He knows exactly where.

Slaves in Little Dixie, he says, eked out a living close to the families that owned them (unlike in the South, where plantation operations were massive and used scores of slaves). Surely they would have been buried closer to their masters — not in the same cemetery but perhaps just outside the perimeter of places like Brightwell.

"I know they're there," Johnson says. "The locals know it, too. Our first dig should have been at Brightwell. There were slaves buried all around there. It ain't over. You can't stop progress, but I don't want anyone buried under the racetrack."

Miller's disappointment is palpable. "We tried our best to find it," he says. "I know there's a cemetery out there somewhere."

But the search has discovered something else.

"Whatever the differences have been in years past, all those things have been laid aside," Kimsey says.

With his new friends, Warren Watkins will continue his hunt for the descendents of Platte County slaves.

And so, as Miller puts it, "The North and the South are united in this effort of all free men to tell the story of the people who lived in this era of Missouri history."

You can reach Nadia Pflaum at Nadia.Pflaum@pitch.com or call her at 816-218-6773

Anticipatory Demolition:
Unresolved Section 106 Compliance Problems

9-28-18

Comments on KCIA Draft Environmental Assessment,
Watkins Foundation of Kansas City, Missouri

KCIA's pending Environmental Assessment (EA) has unresolved Section 106 compliance issues, including questions about anticipatory demolition. In earlier comments on the EA, we documented destruction of five airport historic structures eligible for listing on the National Register of Historic Places. For convenience, these comments are appended below in Appendix 1. The facts can be summarized as follows:

- The historic structures in question were first reported potentially Register eligible in a 1987 report (ERCM 1987).

- A final airport EIS, dated 1981, specifically notified the airport that these properties required Register evaluation, and if found eligible, would require long-term management by the airport under Section 106 (FAA, Final Environmental Impact Statement, Kansas City International Airport 1981: Memorandum of findings, October 6, page 4):

"The buildings of historic interest would not be affected by construction until after 2000. However, FAA intends to condition any grant for land acquisition or reimbursement which would include these sites on language which is made pursuant to procedures for Protection of Historic and Cultural Properties (36 CFR 800 and section 4f of the DOT Act, as applicable). A similar provision will apply to protect archeological sites prior to any construction which could affect them."

- Airport Section 106 study found the five structures Register eligible in a 1987 report (ERCM 1987).

- A 2008 report found these structures had been razed sometime after 1987 without supporting evidence of compliance with Section 106 (ERCM 2008).

- 2008-2016: Watkins Foundation of Kansas City, Missouri repeatedly notified the airport, orally and in writing, that Section 106 compliance for the five structures had not been completed, as per the airport's 2008 report (ERCM 2008). We also warned that potentially significant sub-surface archaeological deposits may exist on these historic sites, based on archaeological excavation of similar airport historic sites (ERCM 2009).

Anticipatory Demolition

The facts summarized above pose a serious question:

- Do the airport's actions constitute anticipatory demolition, as defined by Section 110(k) of the NHPA? Anticipatory demolition is a serious offense in which a party intentionally avoids compliance with Section 106 of the NHPA. The anticipatory demolition standard is as follows:] P63

> "Each Federal agency shall ensure that the agency will not grant a loan, loan guarantee, permit, license, or other assistance to an applicant that, with intent to avoid the requirements of [Section 106], has intentionally significantly adversely affected a historic property to which the grant would relate, or having legal power to prevent it, has allowed the significant adverse effect to occur, unless the agency, after consultation with the Council, determines that circumstances justify granting the assistance despite the adverse effect created or permitted by the applicant."

The airport's pattern of behavior in this case is troubling and should be corrected. Despite proper notification of its failure to comply with Section 106 by several parties, the airport took no action that we are aware of. This was not the result of inadvertent oversight or lack of notification. Rather, this appears to be willful failure to respond, despite repeated notification of the problem, including the airport's own archaeological consultant (ERCM 2008: 21). Given these circumstances, the pending EA's section 106 report should document what happened to the five historic properties shown in Appendix 1. Until such documentation is provided, the question of whether the airport is responsible for anticipatory demolition remains open.] P64

Need for Realistic Assessment of Project's Effects

- The scope of the proposed action may have adverse effects on the five historic sites discussed above and shown in Appendix 1. The draft EA contends something quite different, concluding that the effects of the proposed action do not extend beyond the new terminal itself, an effected area of approximately 100 acres. This conclusion is unrealistic, based on the project's scope of anticipated construction activities and the project's Area of Potential Effects (APE). The APE for this project has been set at approximately 8,000 acres. Significantly, the project's RFP for archaeological services is consistent with this large APE: "The Project Area shall include areas of construction, borrow/fill sites, staging and stockpile areas, utility corridors, and haul routes for the Proposed Action." Clearly, a wide range of potential ground-disturbing activities are anticipated within the APE at locations distant from the new terminal building itself.] P65

Based on our review of the EA's Section 106 study, it's not clear that locations of such outlying construction areas have yet been determined or that such areas were given meaningful consideration in the current Section 106 study. Consequently, how can we reasonably assess whether the locations of historic sites listed in Appendix 1, and possible sub-surface archaeological deposits associated with them, will be affected by outlying construction activities? We can't make such an assessment, unless the pending Section 106 report includes consideration of these sites. P66

We should also note that the project's RFP for archaeological services specifically tasks the current Section 106 study to "summarize investigation efforts to date and the likelihood of potential resources in the Project Area." Yet, no mention of the sites in question of their history of Section 106 compliance is included in the current Section 106 report, despite the notifications to the airport described earlier. We believe this is a material deficiency in the current Section 106 study that should be corrected.

Given these circumstances, we are asking for two actions:

- First, seek guidance from the Advisory Council on Historic Preservation in resolving the issues outlined above. We suggest that the Council's role in determining anticipatory demolition would be helpful in evaluating this case. If the airport is determined to have engaged in a pattern of anticipatory demolition, we suggest that the Council and FAA should then concur in recommending that Federal grants and assistance to the airport be withheld until an MOA has been executed which provides for corrective action. P67

- Once again, appropriate corrective action should include discussion of the "disappeared" archaeological sites in the current Section 106 study. This analysis will provide a realistic basis for Section 106 compliance, in keeping with the project's APE, the dispersed nature of construction activities and requirements of the archaeological services RFP for this project. We are asking that the draft Section 106 study be amended to include such an analysis. P68

References Cited

ERCM (Environmental Research Center of Missouri)
1987 National Register Evaluation of Selected Structures, Kansas City International Airport, Platte County, Missouri (FAA).

2008 Cultural Resource Investigations, Phase I Survey, Kansas City International Airport, Platte County, Missouri (FAA).

2009 Cultural Resources Investigations, 23PL1470, 23PL1504 & 23PL1507, Kansas City International Airport (FAA). Prepared by Environmental Research Center of

Missouri (ERCM), Jefferson City, Missouri. Report on file, Kansas City International Airport.

Federal Aviation Administration
1981 Final Environmental Impact Statement, Kansas City International Airport.

Appendix 1:

Fix the Problem:
KCIA's On-Going Section 106 Compliance Failures

9-13-18
Comments on KCIA Draft Environmental Assessment
Watkins Foundation of Kansas City, Missouri

On-Going Compliance Failures

In earlier comments on KCIA's pending Environmental Assessment (EA), we documented the airport's on-going failures to properly comply with Section 106 of the National Historic Preservation (see Appendix 1 below). Briefly: A previous airport Section 106 study (ERCM 1987), reported five (5) historic archaeological properties potentially eligible for listing on the National Register of Historic Places. Before these sites could be evaluated for Register listing, they were razed under circumstances that remain unexplained. The airport had an affirmative obligation to protect these properties from adverse effects until Register eligibility could be determined and the disposition of these properties was lawfully carried out under terms of Section 106. A second Section 106 study in 2008 (ERCM 2008) reported that the airport had not concluded its Section 106 compliance obligations in relation to these properties. We reported to the airport and to Missouri SHPO in 2016 that Section 106 compliance remained an open issue in the matter of these properties. Below are photographs of the disappeared Register-eligible structures (ERCM 2008). These photos reveal why airport Section 106 compliance remains a problem. These were substantial structures with significant potential for subsurface archaeological remains, including architectural features and artifact deposits:



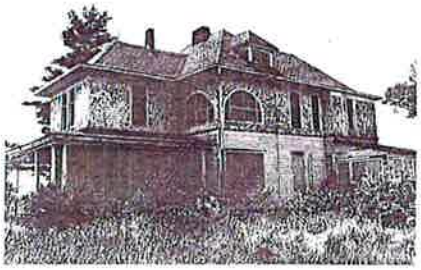
Photograph 12.
Structure # 12 (Elm Grove Church)



Photograph 10.
Structure # 10 (Fox House)



Photograph 11.
Structure # 11 (Fox House)



Photograph 7.
Structure # 7 (Lewis & Clark House)
Girls with arched second floor sleeping porch.



Photograph 14.
Structure # 21 (E. Shepard House)
Side view.

The airport's current EA is the appropriate place to fix these on-going compliance failures for several reasons:

•The EA is specifically tasked with assessing past airport Section 106 efforts and assessing their significance to the current effort. The EA's current Section 106 study should disclose past compliance failures when evidence of such failures is manifest and make recommendations for mitigating these failures.

• Although the five above-ground structures noted above have reportedly been destroyed without Section 106 documentation, the possibility that significant archaeological resources survive below ground has not been assessed, as far as we are aware. A third Section 106 study conducted by the airport, excavations reported in 2009 (ERCM 2009), shows that historic structures like those noted in 2008 (ERCM 2008) may be associated with exceptionally preserved and scientifically and cultural significant below ground archaeological deposits. Until such an assessment is carried out, significant archaeological resources may be at risk. On-going airport land use, including alterations to the landscape from agriculture and related activities and aviation related constructions, remain risk factors.

•The EA is a reasonable and appropriate context for concluding the airport's Section 106 obligations in the matter of these Register-eligible properties.

Fix the Problem

The EA's current Section 106 study should include a Memorandum of Agreement (MOA) between the airport, Missouri SHPO and the FAA to do the following:

• Report, to the extent practical, the conditions under which the five historic archaeological properties were destroyed.

• Obtain SHPO recommendations for sub-surface archaeological testing of the five historic properties shown above and execute an MOA for carrying such testing.

We believe the pending Section 106 study should not be accepted until a plan to fix these long-standing compliance failures is in place.

Ann M. Raab, Ph.D.

September 27, 2018

ATTN: Chris Babb
Landrum & Brown

RE: KCI EA Comments

To Whom It May Concern:

I am writing regarding the request for comments for the KCI Airport's Environmental Assessment plan. As a professional archaeologist specializing in Civil War history and archaeology, I am familiar with the important and irreplaceable archaeological resources that exist on land owned and managed by KCI.

I know that a wide range of comments have already been made on the airport's environmental assessment. I have had the opportunity to read the comments submitted on behalf of the Watkins Foundation, and I whole-heartedly support those comments and their recommendations. As such, I feel that my comments can be very brief and to the point. I feel that the EA needs to be revised to address the following points: P69

- The draft Section 106 report is obligated to review past KCI archaeological studies. This report inexplicably omits major airport archaeological studies that document historic archaeological sites eligible for the National Register of Historic Places. These reports should be referenced and analyzed. These previous archaeological studies are important to the proposed construction. For example, they identify slave-owning farms that once existed on the site of the proposed construction. The institution of slavery in Missouri was unique and has been poorly documented, particularly in archaeological terms. These sites present a rare opportunity to collect information about these important sites. This circumstance is presumably why the Missouri SHPO requested "deep testing" of the new terminal construction area. P70 P71
- African American slave descendants and descendants of Euro-American slave owners have identified themselves to the airport and SHPO, documenting their ties to the archaeological sites mentioned above. This includes ties to the area of new terminal construction. The EA should identify these descendants and seek their comments on how the airport will manage its cultural resources. Their status as descendant communities, in my professional opinion, seems clear. P72
- The descendants mentioned above took successful legal action a decade ago to prevent the airport from moving historic cemeteries associated with the archaeological sites noted earlier. The airport has a conflict of interest. By excluding previous archaeological studies from the EA, it weakens the ability of black and white descendants to document their case in any future legal proceedings involving their ancestors' burial places. P73
- The airport is claiming that construction of the new terminal will have no significant effects outside of the terminal construction area. This claim is contradicted by the fact that thousands of acres have already been developed on airport property far beyond the existing terminals, and much more development is planned, particularly as stimulated by increased aviation activities. The EA should include past, present and future development in enough detail to assess future environmental risk. These trends are another reason for the EA to provide a complete assessment of cultural resources studies to date. P74
- In light of these concerns, I also believe the SHPO should rescind its approval of the EA until these issues are properly addressed. P75

Sincerely,

Ann M. Raab, PhD, RPA-15670

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PROCEEDINGS BEFORE HEARING OFFICER ROB ADAMS
FOR THE ENVIRONMENTAL ASSESSMENT HEARING
FOR THE KANSAS CITY AIRPORT

(The meeting was called to order at 6:00 o'clock p.m. on Monday, September 24, 2018, at the Ambassador Building, Kansas City, Missouri by Hearing Officer Adams.)

HEARING OFFICER ADAMS: Good evening. It is Monday, September 24, 2018, at 6:00 p.m. My name is Rob Adams, and I will serve as the Hearing Officer for tonight's meeting.
I would like to welcome you to the Public Hearing that is being conducted for the draft of the Environmental Assessment of 106 Evaluations, and Section 4, a Statement for the proposed replacement of the Terminal Project at Kansas City Airport.

The purpose of tonight's hearing is to collect comments from the public concerning the adequacy of the information disclosed in the draft Environmental Assessment.

I am officially opening the hearing at this point. We do not have any speakers signed up, so

we will recess until such time as we have speakers.

(Short recess.)

HEARING OFFICER ADAMS: Ms. Kimsey, state your name and you can go ahead and give your testimony.

MS. SHIRLEY KIMSEY: I am Shirley Kimsey. What I want to talk about is the fact that the Airport allowed the Kimsey cemetery to be bulldozed, trees were put on the stones and set on fire. So, it literally deshadowed the old tombstones.

P76

I do have the records to prove this, and it bothers me. There at that time it was three gentleman that were running things down here, and I don't know what their names were now. When I went to them, they said, "Oh, well, they were just old stones." That bothers me to no end.

Those people came out in the wagon train and came out and walking here. That was their final burial resting place. I just don't think that the Airport has done as well as they should on preserving some of this.

P76

The other thing is while I was doing all

this cemetery information, I was told any number of times that under one of the ruins, there is still actually several plots, and they were probably slaves.

Now, I have also heard that when they were doing all of the bulldozing, there were things found, and all that, and they did not preserve those bones, and they just junked them. I am done with what I have to say.

HEARING OFFICER ADAMS: Thank you.

MS. KIMSEY: Just for the record, I was corporate attorney at one time at 6805 Sixth Avenue in New York.

(Brief recess.)

HEARING OFFICER ADAMS: Basically, we have your name and you can begin at any time, and I will let you know when your three minutes are up.

MR. OLIN MILLER: I was representing the local relatives in the cemetery lawsuit in 2008. I came tonight to make sure that the construction folks knew about the Hughes Family Cemetery and the Hughes Slave Cemetery, which are located due south of Terminal B. We don't know exactly how far up in between the Terminal

P76

P77

and the far side of the runway.

The cemeteries were dozed in when the runways were originally built in the last fifties, and we are talking about probably 20 white graves and close to 100 Negro or slave graves.

No efforts were made to remove the bones or the bodies. We don't know what direction the earth movers took the dirt, so anywhere under those Terminals there may be bones. We don't know where they are. P77

If you happen to dig and find them, that is the best we can hope for. There is no written record done back in the late fifties, and there was no effort made at that time to protect anything.

I want you to have that for the record and that is the best we can hope for. Thank you.

HEARING OFFICER ADAMS: You are welcome.

(Brief recess.)

HEARING OFFICER ADAMS: So, will you state your name so he can capture that, and I will let you know when the three minutes are up.

MS. CORA DOUGLAS THOMPSON: I am Cora Douglas Thompson. I am affiliated with the

Watkins Foundation, but I am also a member of the Board of the Banneker School Preservation process in Parkville, Missouri. Now, the school was built for the children of slaves in this Platte County Region, so they could attend school after the Emancipation Proclamation. So, they built this school for the children of the ex-slaves.

It is significant to me that in order to try to sanitize the history of this land, the Airport again is trying to pretend that slaves didn't exist in this area, and I know they don't study history now like they used to, and you are kind of young, too. P78

It is important to notice that it is now true. The Airport took us to court before and lost that case. The judicial branch found that it was more than relevant to keep track of the slaves that were buried in the Airport area.

I heard a young man over there just awhile ago say that if there were any slave graves over there, then they were under the Terminal that exists there now, and the archeologist doesn't know of any slave graves. P79

The insanity of that is just beyond

comprehension to especially try to deny what we know about our history. For what we know is for real in this area, and only the idea that the Assessment Group, I can't think of the proper name, the archeologist that did the Environmental Assessment can pretend there are no graves or artifacts evident, or to verify the existent of those slaves.

You know, some of the family members are right out here in this lobby in addition to me. I am amazed that we can continue on this same vein of denial of active racism, active control, arrogance, those are the adjectives, or those are the superlatives that apply.

Why are we doing this, why are we not embracing these differences? I see my time is up.

HEARING OFFICER ADAMS: Yes, go ahead.

MS. DOUGLAS THOMPSON: For 500 years, black people have been on this continent. Well, it is 600 now. It would seem to me that we ought to be more advanced than that, that we should have learned some of those hate lessons that we went through in those 600 years, that some of those lesson could actually make something real

and good that talks about it.

We are very clear, had it not been for many white people, the Underground Railroad would not have been as successful as it was, the one that is here in Missouri and the one that in Maryland. I am just concerned that we still can't get past all of that hate and that it seems to want to continue to fester in our country. Thank you.

HEARING OFFICER ADAMS; Thank you.

(Brief recess.)

HEARING OFFICER ADAMS: Please take a seat and state your name, and you will have three minutes.

MR. FRANK OFFUTT: My name is Frank Offutt. I am the Deputy Sexton for the Hampton Cemetery Association, at 14400 Northwest 106th Street, Kansas City, Missouri

The Hampton Cemetery Association was started in 1910. It is the redepositing of those bodies that were interred that were natives of the area, the prescribed area that is now being studied fort the Environmental Impact Statement, is that correct?

HEARING OFFICER ADAMS: yes.

MR. OFFUTT: Is that the right terminology? The Association is concerned about the efforts for improvements and what impact from that will be. And it was impacted in 1965 when bodies were removed from Terminal B to a new Hampton Cemetery and Cemetery Annex.

P80

I would like to know what that Terminal is as the only private property owner inside the Airport ground, what the area is as identified in the chart as areas of potential impacts, direct and indirect impacts. My eyesight is pretty good. I will be looking for a response and a reply to our request for information, and it will be the information the card provided this date. Thank you.

HEARING OFFICER ADAMS: Thank you.

(Short recess.)

HEARING OFFICER ADAMS: Mr. Watkins, you have three minutes to speak. What I would like you to do is when you start just say your name for the record.

MR. WARREN WATKINS, JR.: My name is Warren Watkins, Jr. I am with the Watkins Foundation in Kansas City, Missouri. The first thing I want to do is to read you something

The Airport Environmental Study claims there are no minority groups with the interest in the Airport or the archeology sites. Today we have here a bunch of descendants here.

There are groups from the Banneker School in Parkville who are fixing it up and saving it, where the ex-slaves were moved to Parkville, and Banneker School is where the children of the ex-slaves went to school, and they are rehabbing that school. That is a registered not-for-profit entity that represents the descendants of the slaves.

So, my comment is why are you writing us out of history? This is my question, why are we not being recognized by history, the history and the color? It was back in slavery and history, and that is it. Our people were moved and they still have descendants around here. That is the comment I wanted to make. P81

HEARING OFFICER ADAMS: Thank you very much. Have a great evening. It is now 8:05 p.m. on September 24, 2018. I am now officially closing the public hearing portion for the Kansas City Airport Environmental Assessment.

REPORTER'S CERTIFICATE

I, JOHN M. BOWEN, a Certified Shorthand Reporter, with offices at 1100 Main Street, Suite 1880, Kansas City, Missouri, do hereby certify that I was present at the hearing as set forth in the caption page hereof, that I then and there took down in shorthand the proceedings had thereat, and that the foregoing 10 pages constitute a true and correct transcript of such notes made at said time and place.

IN WITNESS WHEREOF, I hereunto set my hand and seal this 27th day of September, 2018.

/s/ John M. Bowen
Certified Shorthand Reporter

KCI Traditional Cultural Property

Comments on *Environmental Assessment and Section 106 Evaluation, Replacement Terminal, Kansas City International Airport, Draft-August 2018.*

by:
The Watkins Foundation,
Kansas City, Missouri

29 September 2018

Summary of Comments:

Kansas City International Airport (KCIA) has issued a draft Environmental Assessment (EA) which can be seen here: https://www.kci-edgemoor.com/documents/

KCIA is required to consider effects of a proposed new airport terminal on cultural properties as required by the National Historic Preservation Act (NHPA), Section 106. The NHPA provides for identification of Traditional Cultural Property (TCP). The draft EA contains a section on Traditional Cultural Properties, pages 52-53 of the EA. We have reviewed this section of the EA and offer the following comments:

- The TCP section of the EA is a response to a document the Watkins Foundation submitted to the airport on March 8, 2018. This document is provided below in Appendix 1. In this document, we described the airport as a TCP of great importance to descendants of enslaved African Americans and to Euro-American descendants of slave owners. These descendants, which today form a community united in their efforts to preserve cultural history, have direct, demonstrable links to 19th Century farms located where the airport's terminals currently stand, including the Proposed Action's direct Area of Potential Effects (APE). p82

- Appropriate TCP evaluation of the Proposed Action's effects should have included consultation with declared TCP stakeholders. p83

- The draft EA should be amended to include discussion of the two main criteria that identify a TCP: National Register eligibility of airport property as a distinct historical and cultural district and consulting with members of a traditional community. Abundant data are available with which to evaluate both criteria and these should be identified and evaluated in the EA. p84

What Is A Traditional Cultural Property?

TCP criteria are set forth in National Register of Historic Places Bulletin 38: https://www.nps.gov/nr/publications/bulletins/nrb38/ , and the following National Park Service guidelines: https://www.nps.gov/history/tribes/Documents/TCP.pdf :

"A Traditional Cultural Property (TCP) is a property that is eligible for inclusion in the National Register of Historic Places (NRHP) based on its associations with the cultural practices, traditions, beliefs, lifeways, arts, crafts, or social institutions of a living community. TCPs are

rooted in a traditional community's history and are important in maintaining the continuing cultural identity of the community. The cultural practices or beliefs that give a TCP its significance are, in many cases, still observed at the time a TCP is considered for inclusion in the NRHP. Because of this, it is sometimes perceived that the practices or beliefs themselves, not the property, make up the TCP. While the beliefs or practices associated with a TCP are of central importance, the NRHP does not include intangible resources. The TCP must be a physical property or place--that is, a district, site, building, structure, or object...

How are TCPs identified? TCPs are best identified by consulting directly with members of a traditional community. Members often have a special perspective on properties that play important roles in their historically rooted beliefs, customs, and practices. While certain properties may be documented in the historic literature or through previous ethnographic or archeological studies, information on other properties may have only been passed down through generations by oral history or practice."

KCIA As A Traditional Cultural Property

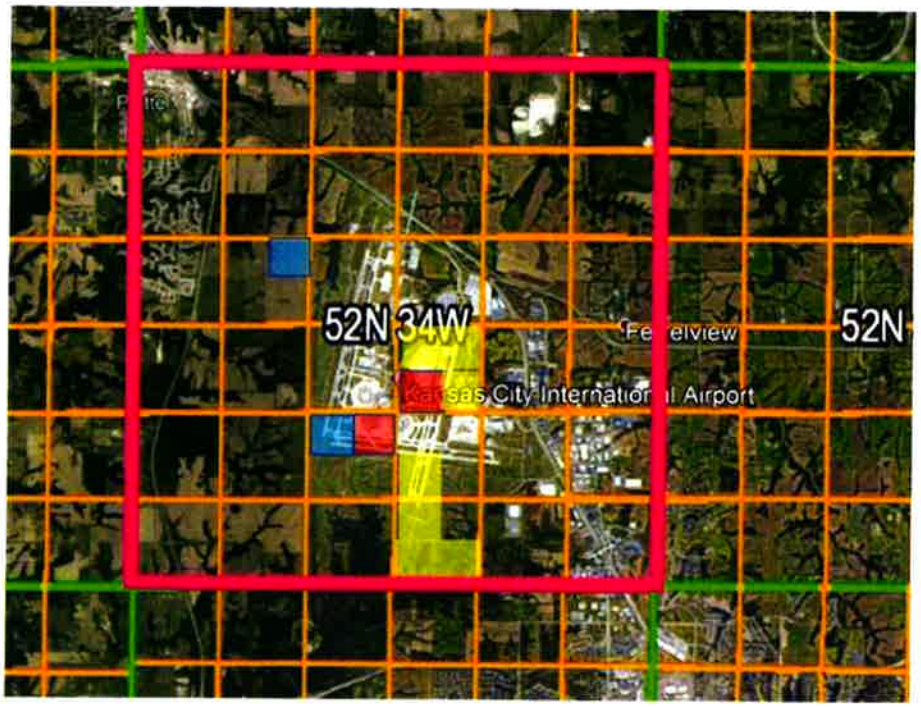
Diverse data sets make a strong case for KCIA as a TCP, as defined above. These include information establishing the airport as a potentially Register-eligible historical and cultural district. These data also include members of a traditional community, partly African American and partly Euro-American, who are working together to preserve airport cultural history. Fundamentally, airport property is an historical context of major importance to expansion of slavery to the 19th Century America frontier and the role of KCIA's slave-owning farms in igniting the Missouri-Kansas Border War and the American Civil War. Appendix 1 outlines the rich data available for documenting this historic context, including African American descendants of the airport's slave-owning farms and the long-standing oral and documentary histories and traditions that link this community to airport land. There are other data that should be considered in recognizing the airport as a TCP, including the following:

p85

Airport Terminal: Ground-Zero of a Cultural Landscape of Slavery

The draft EA (page 52) states, "Because the nature of this action involves replacement of an existing terminal with a proposed terminal of approximately the same footprint, primary impacts of this undertaking are related to that direct impact." This statement implies that the Proposed Action, owing to its limited "footprint", will have no adverse effects on historic properties beyond the terminal itself. This statement is an evasion. It evades African American descendants' prior written request that the EA consider the airport *in toto* as a TCP, employing criteria established by Federal authorities for that purpose. Consider the map shown below:

p86



Key
- Leander Hughes BLM purchase 1 April 1846
- Matthew Moore Hughes BLM purchase 1 April 1846
- Other land acquisitions by Matthew Moore Hughes

At the center of this map are the existing airport terminals, including the "footprint" of the Proposed Action. Pains-taking archival researcher by Dr. Dawn Stricklin, Columbia College, undertaken at the request of the Watkins Foundation, reveals that at least 30 slave-owning farms existed on airport property. Mathew Hughes owned over 30 slaves, ancestors of the descendants discussed in Appendix 1. The proposed construction footprint is located on the site of the Hughes farm. Moreover, a 2009 report of archaeological excavations at the airport documents in detail the farms of Hughes neighbors and relatives, all slave-owning (ERCM 2009). The direct APE of the new terminal is literally ground-zero of a cultural and historical landscape of slavery and its socio-political effects on American society; a landscape that we believe makes a compelling case for designation as a TCP. None of these facts are considered in the EA but we believe they should be, particularly because African American descendants made a reasoned and reasonable request to the airport for such consideration (Appendix 1).

P87

Descendants' Legal Connection to Airport TCP

African American and Euro-American descendants have legal standing which connects them to the cultural landscape/TCP described above. In 2008, the airport petitioned the Platte County, Missouri Circuit Court for permission to move four historic cemeteries located on airport property. These cemeteries are another component of the airport TCP in that they contain the remains of people who built the airport's 19th Century farms (see ERCM 2009). Black and white

descendants were given standing in this case to oppose the airport's petition, which they did successfully (Missouri Court of Appeals 2009).

Re-Stated Descendant Interest in Airport TCP

On September 24, 2018, the airport hosted a public workshop on the pending EA and Section 106 report. African American and Euro-American descendants of slaves and slave-owners attended this meeting, commenting on their concerns about an airport TCP. Press coverage of the descendants and their concerns at this event can be seen here:



'Gentle Giant' Rev. Charles J. Briscoe, 87, Dies; Rites Saturday

Rev. Dr. Tony Evans of Dallas, Texas to Deliver Eulogy

By Rick Earl Abel
Staff Writer

The Reverend Dr. Charles J. Briscoe

Cosby's Sentence Highlights Nation's Aging Prison Population

Bill Cosby's prison mug shot

By Frederick H. Lowe
Blackmar Street Today

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VOL 46 NO. 28 WEEKLY THURSDAY, SEPTEMBER 27, 2018 THRU WEDNESDAY, OCTOBER 3, 2018

Coalition Mounts Effort to Preserve Historic Burial Sites at KCI

ANCESTORS OF SLAVES & SLAVE OWNERS UNITE AGAINST KCI HANDLING OF BURIAL SITES – Black and White ancestors of former slave owners and of former slaves pose with a UMKC archeologist representing their interests during a Public Hearing of the KCI Airport Environmental Assessment, held Monday at an office building near the airport. From left, are, front row, Alcora Mae Spencer, Shirley Kinney, Cora Douglas-Thompson, Daisy Young, Bruce R. Watkins Jr.; and, second row, Ollie Miller, Preston Young, Tom Levin, Linda Watkins, Warren R. Watkins Jr., Lisa Plazza, Platte City Mayor Frank Offutt, UMKC Archeologist Dr. Mark Raab, and Dr. Ike Francis.

By Rick Earl Abel
Staff Writer

Southern Poverty Law Center Attorney Christine Bischoff to Keynote JC NAACP's Freedom Fund Banquet

Page 3

-NATION-

Betsy DeVos Slammed for Wanting to Use ESSA Funds to Purchase Guns in School

Photo Credit: San Antonio Current

By Lauren Potent, NNPA Washington Correspondent

IT'S POPCORN SEASON! BUY LOCAL.

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Proposed EA Amendments

We believe that wide range of cultural and historical data, including previous airport archaeological investigations (ERCM 2009), warrant a good-faith evaluation of the airport's status as a TCP. This evaluation should include (1) consultation with declared TCP stakeholders and (2) consideration of National Register eligibility of airport property as a distinct historical and cultural district. A useful historical context for this evaluation, in our opinion, is Freedom's Frontier National Heritage Area, which includes KCIA: http://www.freedomsfrontier.org/ . The Freedom's Frontier heritage area is administered by the United States Park Service. The Park Service, with its recognized expertise in historic preservation, should be considered to assist with this evaluation. Similarly, representatives of the U.S. Advisory Council on Historic Preservation and Missouri SHPO could play useful roles in commenting on an airport TCP and should be invited to participate.

p88

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ERCM
2009 Cultural Resources Investigations, 23PL1470, 23PL1504 & 23PL1507, Kansas City International Airport (FAA). Prepared by Environmental Research Center of Missouri (ERCM), Jefferson City, Missouri. Report on file, Kansas City International Airport.

Missouri Court of Appeals, Western District 2009 IN RE: The Matter of The REMOVAL OF HUMAN REMAINS FROM CEMETERIES IN KANSAS CITY, PLATTE COUNTY, Missouri. City of Kansas City, Missouri, Appellant, v. Unknown and Unrepresented Persons and Olin Miller, Respondents. No. WD 70006. Decided: November 10, 2009

Appendix 1

SECTION 106 AND NEPA SCOPING OF KCI'S NEW TERMINAL: KCI AS A TRADITIONAL CULTURAL PROPERTY (TCP)

DATE: 3/8/18
TO: Mr. Mr. Chris Babb, Consulting Manager, Brown and Landrum Consultants; Dr. Toni Prawl, Missouri State Historic Preservation Office; Mr. Pat Klein, Director of Aviation.
FROM: Dr. L. Mark Raab, on behalf of the Watkins Foundation of Kansas City, Missouri
RE: Scoping of Section 106 and NEPA compliance of new Kansas City International Airport Terminal

PURPOSE OF THESE COMMENTS

These comments convey concerns of the Watkins Foundation of KCMO and descendant communities about appropriate treatment of historical and cultural resources located in Kansas City International Airport (KCI), as KCI prepares Section 106 and NEPA studies for construction of a new airport terminal complex (under provisions of Section 106 of the National Historic Preservation Act (NHPA) of 1966, the National Environmental Policy Act (NEPA) of 1969, and Federal Aviation Administration (FAA) compliance standards).

The heart of our concerns are the varied and detailed findings that demonstrate KCI as a Traditional Cultural Property (TCP), as provided by Section 106 and FAA compliance standards (FAA 1050.1F Desk Reference, Section 8.2.3.2, July 2015):

> *"A TCP is generally defined as a property that is eligible for the NRHP because of its association with cultural practices or beliefs of a living community that are rooted in that community's history and are important to maintaining the continuing cultural identity of the community."*

Below, we summarize the data that support a finding of the airport as a TCP, and the implications of such a finding for construction of the airport's new terminal. Our comments are divided into the following main headings:

1.0 KCI AS A TRADITIONAL CULTURAL PROPERTY (TCP)
2.0 AREA OF POTENTIAL EFFECT (APE) OF TERMINAL CONSTRUCTION
3.0 APPROPRIATE IMPACT MITIGATION PROCEDURES

1.0 KCI AS A TRADTIONAL CULTUAL PROPERTY (TCP)

KCI's approximately 11,000 acres is a largely intact rural, 19th Century landscape containing documented
archaeological sites linked to known slave-owning farmers and their slaves. Moreover, surviving descendant individuals and communities, Euro-American and African American, trace their direct descent and cultural identity to these sites, as demonstrated by a variety of data. Three lines of evidence-- archaeological data, descendant histories and legal precedents-- make a convincing case for protecting KCI as a traditional cultural property (TCP) under provisions of federal law:

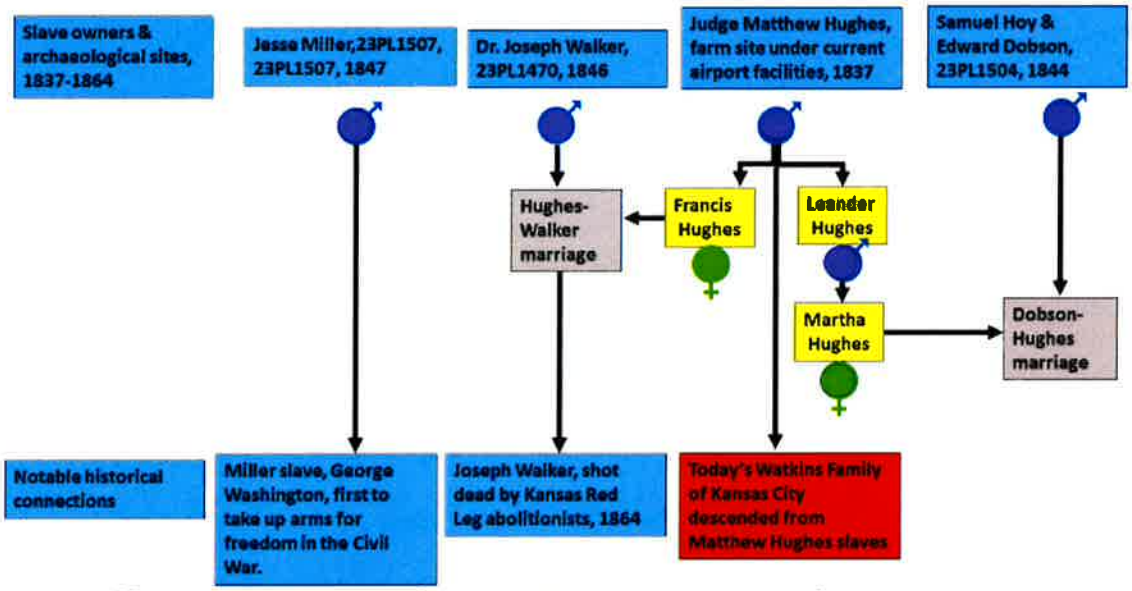
ARCHAEOLOGICAL DATA

In a previous airport Section 106 study, three historical archaeological sites were reported to KCI as potentially eligible for inclusion in the National Register of History Places (Criterion D,

36CFR800 et al.). These three sites, all slave-owning, were subsequently the object of intensive Phase II and III archaeological data recovery investigations, as reported to the airport in Sturdevant-ERC (2009). These investigations included a detailed reconstruction of the historical context of these sites, altogether entailing many thousands of hours of archaeological and historical research. An extraordinarily detailed picture of ante-bellum slave-owing society on the Missouri frontier emerges from this research, including substantial sub-surface architectural remains and a wide range of artifacts associated with life on wealthy, slave-owning hemp plantations of Missouri's Little Dixie. Historical research on these sites shows a high degree of inter-marriage by the farms' slave owners, and likely their slaves. *There is no question that the tightly-knit social networks among slave owners and their slaves formed a cultural landscape, and one of the most documented of its kind in Missouri, and on the larger mid-19th century American frontier.*

Figure 1 below displays some of the 19th Century cultural networks and descendant relationships that are linked the archaeological sites reported in Sturdevant-ERC (2009).

Figure 1: KCI Cultural Landscape and Associated Archaeological Sites



KCI: Four Archaeological Sites and Their Slave Owners

DESCENDANT EVIDENCE

On-going research by Dr. Dawn C. Stricklin of Columbia College, Columbia, Missouri, shows that living individuals and communities can be traced to 19th Century individuals and families, slaves and slave owners, who lived on the archaeological sites described above. Based on continuing, pains-taking research on tax records, military pension records, probate records, slave registers, family oral histories and other sources, Dr. Stricklin's data (Stricklin 2018) documents definitive descent of living persons from the slave owners and slaves outlined in Figure 1. An important example is the African American Watkins family of Kansas City, Missouri. Bruce R. Watkins, Jr. is the son of Bruce R. Watkins, first African American Kansas City Council Member and civil rights pioneer. Bruce R. Watkins, Jr. is curator of the Watkins Culture Center

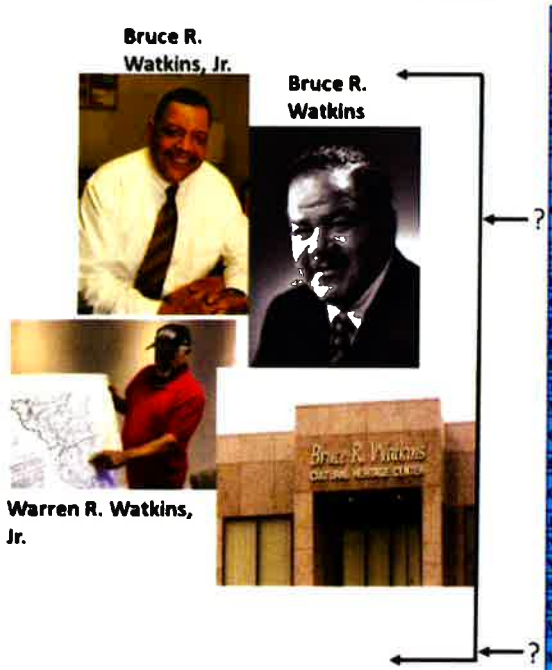
of Kansas City, an influential cultural and civic organization. Another important example is Warren R. Watkins, Jr., president of the Watkins Foundation of Kansas city, Missouri, a community educational resource in African American history and culture, including slave history.

Watkins family oral history has long identified the 19th Century "Hughes Plantation" in today's KCI as the home of the family's slave ancestors. Dr. Stricklin's research has documented this lineage (see Figure 2), showing that the Watkins family is descended from slaves owned by Matthew Hughes in Figure 1, whose slave-holding farm once existed where the current airport was built, and had direct marriage and inheritance ties to two of the other archaeological sites shown in Figure 1.

Yet another example is the late Dr. Jimmy Johnson III, African American archaeologist who originally excavated the Miller Plantation (23PL1507), shown in Figure 1. Dr. Johnson's great-great grandfather, George Washington, escaped to Kansas and joined the Kansas Colored First Infantry Regiment, the first African American unit of the Civil War to take up arms against Confederate forces (Bates County, Missouri at the Battle of Island Mound (today's Island Mound State Park).

The Watkins and Johnson families are only a small subset of the slave descendants that can be connected to KCI cultural resources. Dr. Stricklin's research reveals potentially thousands of descendants of slaves who once occupied KCI.

Figure 2: From Matthew Hughes' Slaves to Kansas City African American Community Leaders



1859-Slaves of Matthew M. Hughes

1859 INVENTORY & AGE		1859 APPRAISEMENT	
Perry	35	Perry	$600
George	45	George	$550
Coop	35	Coop	$900
Jim	30	Jim	$833
Anderson	20	Anderson	$1,150
Grandison	20	Grandison	$1,075
Alleck	18	Alleck	$1,000
Ned	18	Ned	$500
Isaac	45	Isaac	$700
Green	14	Green	$825
Fielding	10	Fielding	$625
Pompey	8	Pompey	$425
Doctor	6	Doctor	$400
Tom	9	Tom	$600
Moses	8	Moses	$450
Commodore	8	Commodore	$400
Baby	3	Baby	$300
Charlotte	75	Charlotte	No price
Jenny	100	Jenny	No price
Nancy	60	Nancy	$1,150
Vine	40	Vine	$400
Scindy	55	Scindy	$250
Cloe & baby	25	Cloe & baby	$1,050
Milly	35	Milly	$525
Mira & baby	21	Mira & baby	$950
Daphney	11	Daphney	$500

LEGAL PRECEDENTS

Legal precedents clearly demonstrate that descendants of persons outlined in Figure 1, including Euro-Americans and African Americans, attach important historical and cultural

significance to KCI (Missouri Court of Appeals, Western District, 2009). In 2008, KCI petitioned the Circuit Court of Platte County, Missouri (ibid) to disinter and relocate human remains in four 19th Century cemeteries located on airport land: Brightwell Cemetery, the Miller-Rixey Cemetery, the Samuel Hoy Cemetery, and the Kimsey Cemetery. Two of these cemeteries are associated archaeological sites shown in Figure 1: Jesse Miller Plantation (23PL1507) and the Samuel Hoy farm (23PL1504).

Living Euro-American descendants of persons buried in these cemeteries opposed the airport's petition, and trial and appeals courts sided with the descendants against the airport. However, African American descendants, including Warren R. Watkins, Jr. and Bruce R. Watkins, Jr. shown in Figure 2, opposed removal of these burials on grounds that unmarked burials of their slave ancestors almost certainly exist in vicinity of the historic slave-owning farms and their associated cemeteries shown in Figure 1. These descendants argued that any plans to move the marked cemeteries or build land-disturbing developments around locations that once included slave-owning farms should make a reasonable effort to detect and move unmarked graves (archaeological construction monitoring).

Trial court gave credence to the concerns of African American descendants by appointing them counsel and *guardian ad litem* for unknown and unrepresented respondents who opposed the airport's plans, recognizing that the concerns of parties like the Watkins family should be heard and represented in the case. Commenting on this logic, trial court further commented:

"*Many people believe that there are unmarked slave graves among and around these four cemeteries. Certainly there were many slaves in Platte County before the Civil War, and slaves were known to have been buried in and around family cemeteries like the ones at issue, but preliminary searches of suspected slave burial sites near the family cemeteries have not yielded any signs of human remains.*" (Missouri Court of Appeals, Western District, 2009).

This assessment by the court merely expresses the reality that during the 19th Century, occupants of farms like those in Figure 1, including slaves, were typically buried in or around family cemeteries on farm property, and that the resulting graves may or may not have been permanently marked and therefore detectable today from surface markers. That unmarked slave graves have not been discovered to date does not lessen the virtual certainty of their existence. Nor does it lessen the historical and cultural significance attached by African American descendants to slave-owning farms (archaeological sites) and their associated human burials. *These Legal precedents clearly document that living descendant communities attach important historical and cultural significance to KCI and its archaeological resources.*

For all its remarkable findings, the airport's previous Section 106 investigation (Sturdevant-ERC 2009) was not tasked with the question of whether the sites discussed above and their history have direct ties to living individuals and communities; i.e., whether KCI's 19th Century cultural landscape and its surviving archaeological resources are a Traditional Cultural Property (TCP) for living groups of people. Based on evidence summarized above, but not limited to these data, surviving African American and Euro-American families have active and significant historical and cultural connections to KCI and its archaeological resources. Among these are ancestral graves, marked and unmarked, and the 19th Century cultural landscape that survives in the airport's archaeological record. These communities include surviving African American slave descendants in Kansas City, Missouri and other states. These varied and detailed findings make a strong case for KCI as a TCP, as defined by Section106 and the FAA's compliance standards:

"A TCP is generally defined as a property that is eligible for the NRHP because of its association with cultural practices or beliefs of a living community that are rooted in that community's history and are important to maintaining the continuing cultural identity of the community."

2.0 AREAS OF POTENTIAL EFFECT (APE) OF NEW TERMINAL CONSTRUCTION

Section 106 and NEPA require projects like the new airport to consider Areas of Potential Effect (APE) that are both short- and long-term. Section 106 considers the immediate possible effects of a project on specific historical properties, such as the types of archaeological sites noted Figure 1. NEPA says that *long-term, indirect and cumulative effects* on historical/archaeological resources must also be part of the planning process, if such effects are reasonably foreseeable. It is reasonably foreseeable that more of the airport's 11,000 acres will be developed in response to construction of the new airport. The airport's master plan calls for such long-term development. Accordingly, the new airport's construction should take into account both short-term and long-term, cumulative effects of the project's APE on historical/archaeological resources. Impact mitigation strategies included in of the current Section 106/NEPA plan should address short- and long-term impacts (see Section 3.0 below).

2.1 New terminal construction should consider the project APE to include not only the "footprint' of the new terminal building itself, but also any potentially ground-disturbing activities around it, including things like haul roads; equipment and supplies storage yards; utility pads and trenches and vaults, new roads; runway modifications, etc.

2.2 Given the possibility of buried, unmarked archaeological remains, including human graves, associated with the archaeological resources described above, the APE should consider the possible discovery of such resources during construction excavation.

Ample precedents show that archaeological remains like those described above sometimes survive under existing structures, pavement, roads and other facilities. Historical records show, for example, that the farm of Matthew Hughes, shown in Figure 1, existed under the current airport complex. The possibility that archaeological remains or this or other past settlements and graves exist under present airport constructions should not be dismissed, but rather form part of the planning for the new terminal.

2.3 It should be recognized that loss over time of important archaeological resources like those described in Figure 1 is a significant *cumulative impact* on a protected resource, as defined by NEPA.

The new airport's impact mitigation plan should include explicit provisions for managing the contingencies described above. (See Section 3.0 below).

3.0 APPROPRIATE IMPACT MITIGATION PROCEDURES

We strongly recommend that the airport's new Section 106/NEPA plan include strategies which offer effective ways of mitigating short-term and long-term, cumulative effects on historical/archaeological resources.

3.1 Nominate the airport as a Traditional Cultural Property (TCP) for listing on the National Register of Historic Places (NRHP), based on the following significance criteria (36CRF800), and as amended:

Criterion A, "Event," the property must make a contribution to the major pattern of American history (e.g., expansion of slavery onto the 19th Century American frontier; contributions of KCI settlers to Missouri-Kansas Border War and Civil War; post-Civil War development of Kansas city).

□ **Criterion B**, "Person," is associated with significant people of the American past. (e.g., George Washington, runaway slave; connected to Missouri Island Mound State Park; Joseph Walker, secessionist, killed by Kansas abolitionist forces, Figure 1, and others.)

□ **Criterion D**, "Information potential," is satisfied if the property has yielded or may be likely to yield information important to prehistory or history (e.g., KCI's rural, largely intact 19th Century cultural landscape, including sites in Figure 1., are exceptionally well preserved examples of life on the mid-19th Century American frontier and how that frontier was shaped by the spread of slavery and its related social and economic institutions.)

3.2 Adopt an airport cultural resources management plan that includes appropriate archaeological construction monitoring for detecting and preservation of buried cultural resources, including unmarked human graves.

3.3 Install exhibits in the new airport terminal that interpret to the public the important cultural and historical events associated with the airport, including the airport as a Traditional Cultural Property.

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Stricklin, Dawn C.

2018 KCI Slave Holding Families v. 1-25-18, manuscript in author's possession.

Missouri Court of Appeals, Western District

2009 IN RE: The Matter of The REMOVAL OF HUMAN REMAINS FROM CEMETERIES IN KANSAS CITY, PLATTE COUNTY, Missouri. City of Kansas City, Missouri, Appellant, v. Unknown and Unrepresented Persons and Olin Miller, Respondents. No. WD 70006. Decided: November 10, 2009

Environmental Assessment Lacks FAA-Required Historic Preservation Plan

10-1-18

Comments on KCIA Draft Environmental Assessment
Watkins Foundation of Kansas City, Missouri

Kansas City International Airport (KCIA) has submitted a draft Environmental Assessment (EA) to get permission to build a new terminal: https://www.kci-edgemoor.com/documents/ We submitted earlier comments on the EA, detailing our concerns about the EA's sections on environmental justice, cumulative environmental effects, Section 106 report, as well as undocumented destruction of Federally- protected historic resources and others. A root cause of the problems identified in our comments is KCIA's lack of a historic preservation plan (HPP). This problem and a proposed remedy are summarized as follows:

- Federal Aviation Administration's (FAA) land-use regulations require KCIA to prepare a historic preservation plan (HPP). The draft EA references no such plan in its discussion of the airport's archaeological and historical resources.] P89

- We notified KCIA and the Missouri State Historic Preservation Office (SHPO) of our concerns about the airport's lack of a HPP in 2016 (see Appendix 1 below).

- We are requesting that the FAA, Advisory Council for Historic Preservation (ACHP) and the Missouri State Historic Preservation Office (SHPO) to condition acceptance of the draft EA on preparation of an MOA in which KCIA agrees to prepare an airport HPP.] P90

FAA Requirement for HPP

In *Land Use Compatibility and Airports*, the FAA offers the following guidance:

"The FAA or its sponsor airports must prepare historic preservation plans for projects under its jurisdiction that discuss survey and evaluation strategies, costs, and schedules, and that establish management objectives for historic properties."
https://www.faa.gov/about/office_org/headquarters_offices/apl/noise_emissions/planning_toolkit/media/III.B.pdf, page III-13.

This guidance establishes an affirmative obligation of FAA-obligated airports like KCIA to prepare a HPP as part of compliance with the National Historic Preservation Act.

No Existing KCIA Historic Preservation Plan and the Unfortunate Consequences

In earlier comments by the Watkins Foundation on the draft EA, we documented long-standing problems with protection of archaeological and historic resources at KCIA, including undocumented destruction of properties found eligible for listing on the National Register of Historic Places (see our comments in Disappearing Archaeology and KCI Conflicts of Interest). We also documented deficiencies in the draft EA's Section 106 report, including failure to reference major archaeological studies performed at KCIA in the past (see Review of Section 106 Report KCI New Terminal EA). All these problems have a root cause: the lack of a HPP. P91

The lack of such a plan is evident in the draft EA. No reference can be found to such a plan. Instead, the draft EA treats the airport's historic resources in a piecemeal fashion. The result is *ad hoc*, confusing and sometimes contradictory statements about the airport's historic resources. The lack of a HPP hinders an institutional memory of past resource studies and decisions, and the identification of coherent management goals for the future. We believe that past failures to protect resources, described in our earlier comments, can be traced directly to the lack of an airport HPP (see Appendix 1 below).

Current airport planning documents reference historical resources, but these are essentially superficial placeholders in a list of compliance categories. These contain no discussion of "survey and evaluation strategies, costs, and schedules, and that establish management objectives for historic properties." Nor do these placeholder categories reference a coherent data base of past archaeological and historical studies conducted at the airport and their outcomes. The lack of such a data base is apparent in the draft EA's Section 106 report, which fails to reference important archaeological studies conducted at the airport in the past; studies which have an important bearing on the current Section 106 investigation. These earlier reports, for example, discuss important archaeological discoveries in the construction area the Proposed Action. There is also the future to consider. The airport plans to develop much of its 53 square miles of land. These development objectives should include an airport HPP. P92

We brought the lack of an airport HPP to the attention of KCIA and the Missouri SHPO in 2016. These concerns can be seen below in Appendix 1, our letter to the Missouri SHPO. We received no response to our concerns about this issue. We believe the draft EA is the appropriate place to revisit these concerns.

Require Preparation of an Airport HPP

We are requesting that acceptance of the draft EA's Section 106 report be conditioned on preparation of an MOA in which KCIA agrees to prepare an airport HPP. We believe that such a plan is required by FAA regulations, and is essential to informed management of the airport's historic resources. We suggest that the FAA, ACHP,

SHPO and community stakeholders, such as the Watkins Foundation, should be called upon to develop the airport's HPP.

Appendix I:

Dr. Toni Prawl
Deputy State Historic Preservation Officer
Missouri Department of Natural Resources

12-7-16

Dear Dr. Prawl,

As you may know, the Advisory Council on Historic Preservation has just opened a formal inquiry with the FAA about Kansas City International Airport's (KCI) compliance with Section 106 of the NHPA. I have attached the ACHP's letter to the FAA, dated 6 December, 2016. This letter is in response to a complaint that the Watkins Foundation of Kansas, MO filed with the ACHP on 3 October, 2016, also attached. My role in this matter is technical adviser to the Watkins Foundation, in my capacity as a professional archaeologist. My work as an archaeologist reaches back about four decades. I'm adjunct professor of geosciences at UMKC, and my work in Missouri includes teaching DNR-sponsored programs in archaeological survey with the MAS. My wife, Dr. Ann Raab, and I excavated part of Island Mound State Park, Bates County, MO, on behalf of DNR. My CV is attached.

The Watkins Foundation has deep roots in the black community of Kansas City reaching back about 100 years. I began working with the Watkins in 2007-08, serving as an expert witness in a court case involving disinterment and reburial of historic cemeteries in KCI. KCI lost this case at trial and on appeal, but was a revelation about the airport's failures to comply with Section 106 over a period spanning decades. Evidence supporting this claim is included in the complaint letter to the ACHP, attached. Still, the ACHP found this evidence sufficiently compelling to open a formal inquiry; an inquiry which is bound to involve your office.

Our concern is the failure of the airport to adopt, in the past or presently, a formal, comprehensive cultural resources management plan. Evidence clearly shows that without such a plan, Register-eligible historic and archaeological properties have been destroyed under undocumented circumstances while others remain at risk. We have had several meetings with airport staff. We requested information on the fate of these federally-protected resources. As incredible as it may seem, nobody representing the airport appears to have any idea what resources exist in the airport and what might or might not have happened to these. There simply is no historical memory or programmatic approach to treatment of historic resources protected under federal law. It's the distinct impression of airport staff that Section 106 compliance is fulfilled simply by filing phase-one archaeological reports with the FAA, then commending these reports to a filing cabinet where they are forgotten. The fact that the airport has any follow-on obligations to formally manage these resources in accordance with the terms of the reports they submitted to the FAA and to your office is met with frank skepticism. KCI owns and operates about 12,000 acres, an area containing hundreds of documented historic sites. The airport has ambitious development plans for this land, some of which are currently under construction. Is any of this being

coordinated with knowledge of protected cultural resources? Not as far as we can determine; not as far as airport staff can articulate to us. Airport management seems to believe that compliance is met by inserting a clause in construction contracts which asks construction personal to report something if they see something. We view this as a completely inadequate approach to resource protection because of obvious conflicts of interest, lack of expertise by construction personnel and clear potential harm to protected resources.

Here are our fundamental concerns: Descendants of enslaved African Americans who trace their ancestry to 19th century farms located in the airport, as well as white descendants of slave owners connected to these same properties, know that unmarked family burial plots are almost certainly attached to properties that once existed in the airport. These folks want what other federally-regulated facilities already provide: a CRM plan that includes consultation with descendant communities and a construction monitoring program to detect and respectfully treat unmarked burials within defined archaeologically sensitive areas. Beyond respectful treatment of the graves of slaves and others, we see no reason why the airport cannot and should not develop a comprehensive CRM plan to guide management of all relevant historic resources, in accordance with its Section 106 compliance obligations. The airport unquestionably has the resources to develop and implement such a plan. Given that federally-regulated public airports across the country, as well as a host of other agencies, have such plans, it's remarkable that KCI has operated for so many years without one. It's also clear that the absence of such a plan continues to put federally-protected resources at risk.

We also stress to value of such a CRM plan to the wider community. Apart from legal compliance, we envision an airport CRM plan as an invaluable platform for educating the public about the region's historical legacies, including the lives of enslaved African Americans. This plan would dovetail perfectly with the objectives of Freedom's Frontier National Heritage Age, since personalities known to have resided on airport lands, black and white, are connected to themes featured by FFNHA and at parks such as Battle of Island Mound.

We hope that your office will join us in calling for development of a CRM plan for KCI airport. We look to your office for critical guidance in developing this plan. As an important step in that direction, it would be helpful if you could provide the Watkins Foundation with documents on file with your office regarding KCI's Section 106 compliance. This is an important first step toward developing a critical baseline of existing CRM data for the airport.

If you have questions, we would be delighted to speak with you or others in the SHPO's office. We hope to hear from you soon.

Sincerely,
L. Mark Raab, Ph.D.
On behalf of the Watkins Foundation of Kansas City, MO

Chris Babb

From: KCIEA Comments
Subject: FW: Supplemental Comments for KCI EA

From: Ann Raab <annmraab@gmail.com>
Sent: Monday, October 1, 2018 1:54 PM
To: KCIEA Comments <KCIEAcomments@landrum-brown.com>
Cc: katherine.andrus@faa.gov; anne.n.christenson@faa.gov
Subject: Supplemental Comments for KCI EA

I would like to add the following comments regarding the KCI EA:

As we know, this EA is being done because Kansas City International Airport is requesting permission to build a new airport. In my opinion, this project is exposing poor management practices that have been going on at the airport for decades. One example is recent news stories about alleged illegal diversion of airport revenues and possible FAA audit of the airport. News stories are also reporting that construction will be delayed because airport managers believed they would not be required by the FAA to do an environmental study. What else has the airport been doing that needs a closer look?] P93

The airport is enormous, over 50 square miles, and we've seen thousands of acres of KCI property being developed over the years. It's not clear what kind of environmental impacts have resulted from these developments or whether the airport has complied with regulations in developing this land. For instance, have all previous construction/development projects gone forward with proper approval of the Airport Layout Plan (ALP)? I believe that a serious review of airport land development is overdue, and that an FAA audit of these practices is warranted. I hope the new airport project and its environmental study will bring some much-needed accountability.] P94

Ann M. Raab,PhD
RPA - 15670

Re: Airport Environmental Assessment

October 1, 2018

To Whom It May Concern:

My name is Thomas M. Levin. I am a lifelong resident of the Greater Kansas City Metropolitan Area, currently residing in Cass County, Missouri. I am a descendant of persons known to be buried in cemeteries that are located on what is now airport land.

My great-great-great grandfather, Samuel R. Offutt, moved to Platte County in 1843 from Ray County, Missouri. His seventh son, Otho ("Dock") Offutt married a cousin, Sarah ("Sally") Setlle and moved to Hampton, Missouri in 1869. They resided on a farm adjacent to the farm of Jesse Miller. Sarah's mother, Achsah (Miller) Settle is the sister of Jesse Miller. Sarah's parents, who were two of my great-great grandparents, John and Achsah Settle, are both buried in the Miller-Rixey Cemetery, located on what was the Miller farm and now airport land. I have other more distant relatives buried in some of the many pioneer cemeteries located in Platte County, including others on airport land.

I have seen and read news reports of airport archeology as well as my personal copies of such documents as follow:

The Miller Plantation: An Archeological Interpretation of a Northwest Missouri Antebellum Slave Site-1998, Jimmy S. Johnson, III, Principal Investigator;

Cultural Resource Investigations 23PL1470. 23PL1504 & 23PL1507 Kansas City International Airport, Platte County, Missouri – 2009 Prepared for the City of Kansas City, Missouri, Craig Sturdevant, Principal Investigator.

Having done a cursory review of the airport's environmental assessment, I am concerned that reports such as these are not included in the environmental report, much less even mentioned. At best this would appear to be an oversight. At worst, it would seem to be an intentional omission intended to ignore the significant and well documented archaeology and history of the area, including the airport. P95

I believe the Aviation Department and the Developer should consult with the descendents regarding their wishes for the treatment of archaeology and history of the airport land. P96

Sincerely,

Thomas M. Levin
26310 S. Hickory Trail
Harrisonville, Missouri 64701

Gmail Search mail

3,641

Hello everyone,

Perhaps this story will be of interest. The group photo and story are from a public workshop I International Airport on the 24th of this month. The workshop provided an opportunity to co pending Environmental Assessment, including the Section 106 study. The descendants, black to 19th Century archaeological sites and cemeteries on airport land. They have been working preserve their family legacies and U.S. history. This group was not allowed by the airport to n the workshop, but we were able to show a Power Point and to answer the questions of intere outside the meeting.

p97

Mark Raab, Ph.D.
For the Watkins Foundation,
Kansas City, Missouri

2 Attachments





'Gentle Giant' Rev. Charles J. Briscoe, 87, Dies; Rites Saturday

Rev. Dr. Tony Evans of Dallas, Texas to Deliver Eulogy

PDF Globe story.pdf

(816) 531-5253 . kcglobe@swbell.net . DIGITAL VERSION: thekcglobe.com

THE KANSAS CITY GLOBE

Proudly Serving Missouri and Kansas Since 1972

VOL. 46 NO. 26 WEEKLY THURSDAY, SEPTEMBER 27, 2018 THRU WEDNESDAY, OCTOBER 3, 2018

Coalition Mounts Effort to Preserve Historic Burial Sites at KCI



ANCESTORS OF SLAVES & SLAVE OWNERS UNITE AGAINST KCI HANDLING OF BURIAL SITES – Black and White ancestors of former slave owners and of former slaves pose with a UMKC archeologist representing their interests during a Public Hearing of the KCI Airport Environmental Assessment, held Monday at an office building near the airport. From left, are, front row, Alcora Mae Spencer, Shirley Kimsey, Cora Douglas-Thompson, Daisy Young, Bruce R. Watkins Jr.; and, second row, Olin Miller, Preston Young, Tom Levin, Linda Watkins, Warren R. Watkins Jr., Lisa Plazza, Platte City Mayor Frank Offut, UMKC Archeologist Dr. Mark Raab, and Dr. Ike Francis. *Photo/Velda Cook*

By Rick Earl Abel

Staff Writer

A peculiar coalition has formed to preserve "historic burial grounds" on land where the new KCI Airport is to be built, and coalition members are urging public support to "oppose the injustice" of Airport management attempts "to write African Americans out of history." All of them descendants of Platte County ancestors, are asking those concerned to register their protest by a Tuesday, Oct. 2, deadline.

The coalition – Black and White off spring of former slave owners and of former slaves – says it knows the graves exist and have roughly pinpointed the location beneath the Terminal A grounds where the new KCI Airport is to be built. They claim airport management is angered by the loss of a previous lawsuit and the loss in an appeal in 2008, following a previous attempt to dig up and move graves.

Members of the coalition were present at a "Public Hearing: KCI Environmental Assessment" Monday evening at the Ambassador Office building, 12200 Ambassador Dr., in the shadows of the airport. Attendees were invited to submit oral comments or written comments, which would be considered in the assessment if received before an Oct. 2, 5 p.m., deadline.

Now this coalition group wants excavators of the new KCI Airport Terminal to acknowledge and consider their claims of a slave cemetery beneath runways "while there is still time" to investigate and verify it before construction on the

Continued on page 8

Coalition

Continued from front

new terminal begins, says Bruce R. Watkins Jr., son of former City Councilman and Freedom, Inc., founder, Bruce R. Watkins, Sr.

Working with them is UMKC archeologist Dr. Mark Raab who presented evidence of rural farm residences and artifacts in the earlier court cases. Platte City Mayor Frank Offutt, and his cousin Tom Levin, retired Kansas City School District educator, confirms the family's history as former slaveholders in the area and acknowledges slaves would have been buried in a nearby cemetery on family property.

Federal law requires KCI to evaluate archeological sites known to exist at the airport, but coalition members and Dr. Raab said several previous documenting studies that produced confirming evidences of settlements on the airport's 53 square miles of land from the 2008 court case "are mysteriously missing from the airport environmental assessment."

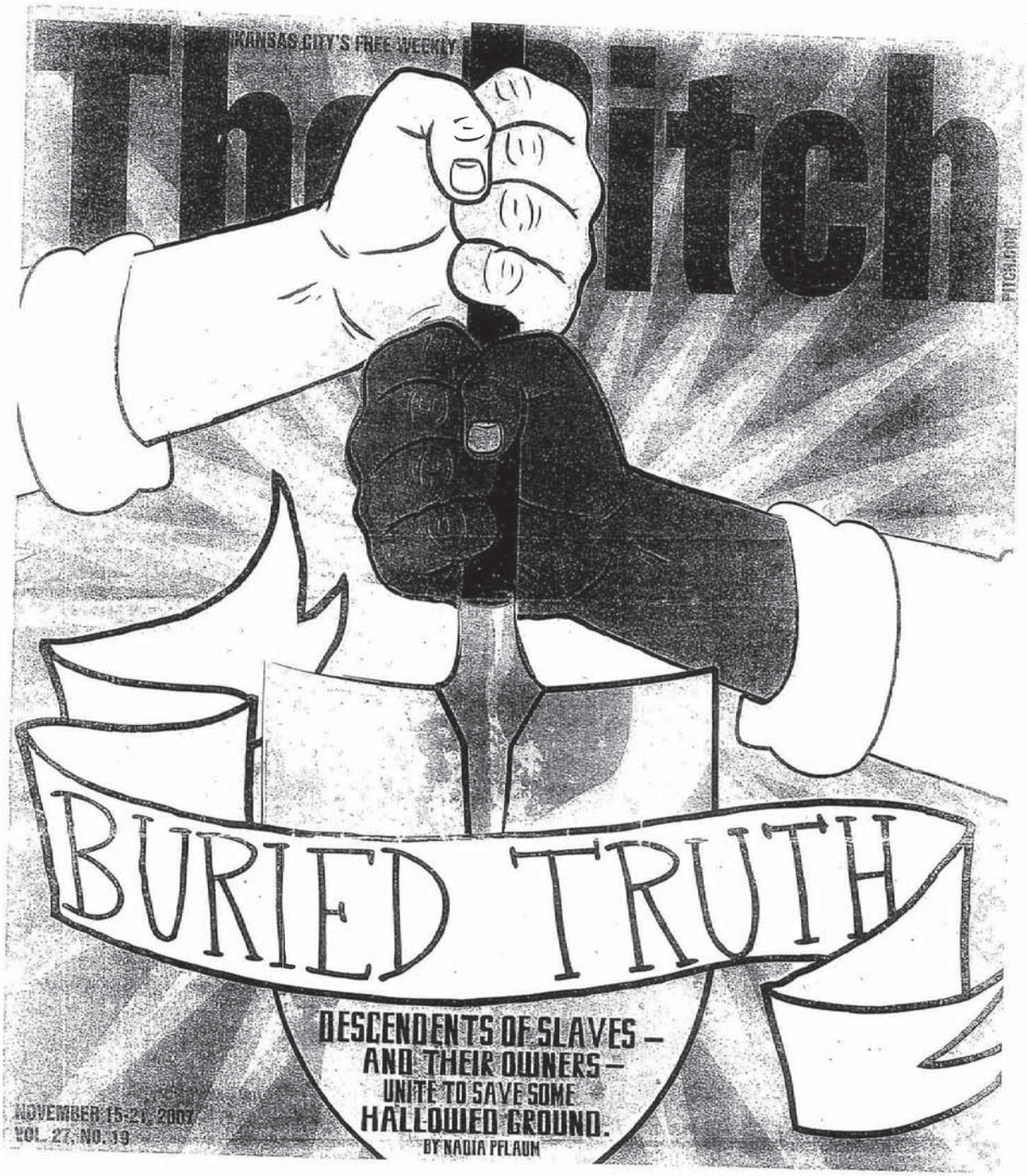
The airport's archeologist, Dr. David Wilcox, said Monday he had not been made aware of those studies done by Dr. Raab. Wilcox is with the firm Golder Associates based in Green Bay, Wi., but said he works from a division of the company in Atlanta. Excavations of sites found to harbor such findings become subject to supervision by the State Historical Preservation Office (SHPO), he said.

Warren Watkins, son of the late Warren Watkins Sr. and a nephew of Bruce R. Watkins Sr., is the contact person for the Watkins Foundation spearheading efforts for more stringent supervision of excavations during the airport construction process. He can be reached at 816-547-9905.

ARE YOU REGISTERED TO VOTE? IT'S NOT TOO LATE.

KANSAS CITY'S FREE WEEKLY

The Pitch



DESCENDENTS OF SLAVES – AND THEIR OWNERS – UNITE TO SAVE SOME HALLOWED GROUND.

BY NADIA PFLAUM

NOVEMBER 15-21, 2007
VOL. 27, NO. 19

BURIED TRUTH

Up at the airport, under what's slated to be a private racetrack, no one's resting in peace.

It's been light for only an hour, but the Watkins Brothers Memorial Chapel is open for business. In the back of the Cleaver II Boulevard complex, two new coffins, still shrink-wrapped in plastic, stand on rolling platforms in a concrete hallway. Later today, they will contain two of the community's recently deceased. For 98 years — four generations — this family-owned funeral home has buried the city's African-American dead. This morning, though, Warren Watkins Jr., vice president, embalmer and funeral director, has business concerning people who have been dead much longer.

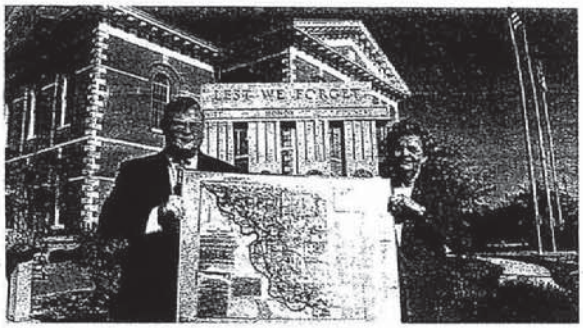
Watkins walks out the garage doors and unlocks a black Cadillac limousine. A regal-looking woman in an African-patterned dress follows, settling into the back as Watkins gets in the driver's seat, chauffeur-style. Soon, they're zooming out of the city, past the exit ramp for Kansas City International Airport, past the undulating hills where red-tinged trees grow in strips between fields, toward the Platte County Courthouse. They're rushing to pick up Lillie Jackson, a woman in her 80s, in time for a 9 a.m. hearing. There, a judge will determine whether Watkins and an archaeologist are allowed to dig on the airport's land for what they think is concealed by tangles of underbrush and a few heavy red stones: the remains of the slaves who built Platte County.

The soil around Kansas City's airport is similar to that in Virginia. Settlers from that part of the country came to Platte County in the 1800s, bringing their slaves with them. They nicknamed the area "Little Dixie" and planted crops of tobacco and hemp. The backbreaking work of tending the soil and cleaning the equipment was done mostly by slaves. Watkins' grandmother, who was born in Parkville, remembered that the names Tolson and Hughes — the names of their white slave owners — figured early in the family's genealogy.

"Parkville was freedom," Watkins explains as he turns the limo off the highway to a residential neighborhood of one-story houses spread among woody stands of trees. If slaves could escape to Parkville, they could make it to Kansas — the free state.

"The underground railroad started there, in Quindaro," Watkins says. "That's where they were hiding them. One real cold winter, you could walk across the frozen river, and if you could get to Parkville, you were good."

The regal woman in the backseat, Timberlyn Smith, speaks up. She's along for the ride after some friends in her book group read a newspaper article about the Platte County hearing and told her that she should attend. Smith is an environmental consultant and a biology instructor at Park University.



Olin Miller and Shirley Kimsey hold Kimsey's cemetery map.

"My white friends don't see, you know. You have to kind of educate them," she says over the noise of the road. "They say, 'You all need to get over it [slavery]. It's in the past. It's history. There's no problems now.' There is a discord between the races that we tend to try to glaze over because it's easier."

Watkins says, "We need healing. No more denying. Once you admit you have a problem, then you start dealing with it. Once we find one [grave], it just opens it up, and we'll keep looking till we find them all. For the first time, these people will be treated like human beings."

Watkins pulls up to a white-shingled house on a concrete foundation with a little white Ford parked outside. A stooped woman steps out with her cane, turns to lock her wrought-iron door and greets Watkins, whom she calls "Butch." With his help, Lillie Jackson crawls into the rearmost section of the limo and smiles out the window on the way to the courthouse.

Smith asks her what she thinks about their morning's activities.

"I don't know," Jackson replies slowly. "I got up this morning, and I said, I don't know what to think. I'm just going to be solid and ask God what is the right thing to do."

Watkins parks in front of the Platte County Courthouse, the centerpiece of Platte City's Main Street. Kansas raiders burned down the original courthouse, along with much of the town, in 1861, the first year of the Civil War. It was rebuilt and in 1933 was the site of the trial and conviction of Blanche Barrow, who ran with bank robbers Bonnie Parker and Clyde Barrow.

Watkins, Smith and Jackson file past uniformed guards, through metal detectors and into the courtroom, where the first hearing on the docket is that of a young blond woman, newly divorced, who wants her name changed. The attorneys for Kansas City's Aviation Department and Robert Shaw, the attorney representing the unknown people buried on a tract of airport property, wait for their turn in front of Circuit Court Judge Abe Shafer. Also waiting are half a dozen concerned citizens like Smith.

None of this would be happening if it weren't for luxury sports cars.

A businessman and auto enthusiast named Rick Watkins — no relation to Warren Watkins and the funeral-home family — and his partners in a company called FastTrack Group LLC plan to build a private motor-sports country club on a 300-acre chunk of city-owned property near the airport.

It would be a playground for Porsche and Ferrari owners who long to push their speedometers into the red. Construction is scheduled to begin in the summer of 2008 for a 2009 opening. Plans for the KCI Motorsports Park — naming rights are for sale — show manicured lawns surrounding two immaculate road courses that could be merged into one 3.75-mile circuit. Amenities, according to the track's Web site: a separate go-kart track, an exclusive clubhouse with views of the racing, a cafeteria and a pro shop. Flyover property near KCI seems perfect for the site, especially after planning officials from FastTrack's first choice in Miami County, Kansas, rejected the project in 2005 because of noise concerns.

It would be a playground for Porsche and Ferrari owners. The lowest price for a membership is $15,000 a year, preconstruction, for a motorcyclist. (The cost of a membership will go up after the track is built.) A single go-kart driver pays $35,000, which doesn't include access for his or her family. A better-heeled member who wishes to test the limits of his machine can pay $85,000 preconstruction or $100,000 postconstruction for a "founding membership."

Rick Watkins has not responded to *The Pitch*'s repeated requests for an interview, but, according to the Web site, work on the track "was moved back one year to allow the Aviation Department time to resolve a lawsuit unrelated to this project."

That lawsuit *is* related to the project, however, because if it isn't resolved, FastTrack can't break ground. Standing in its way are four marked pioneer cemeteries on the acreage. The city of Kansas City, Missouri, filed suit in Platte County Court on February 22, seeking

BY NADIA PFLAUM **PHOTOS BY MICHAEL FORESTER**

Fate Of 'Unknown' Slave Remains Entangled In Battle Between City And Descendants Of Slave Owners

By Domnick Hadley
CALL Staff Writer

The bones are talking.

And archaeologist Jimmy Johnson, Warren Watkins and a slew of Platte county residents hear them loud and clear.

The bones tell the stories of descendants who once occupied an area dubbed "Little Dixie", a hemp producing community that trailed the upper south and northwestern corners of Missouri.

The descendants, mainly white land owners, migrated from southern slave states including Virginia, Kentucky and Tennessee in search of cheap and fertile land, according to historical accounts.

But more important than the circumstances in which they arrived, now, is the history they left behind. A history which includes the lives of thousands of African American slaves.

Johnson, Watkins, and descendants of the land owners are in a fight with city government to halt development on tracts of land where four known homestead cemeteries exist.

Also at issue, are the unknown remains that Johnson and Watkins contend are those of slaves and Native Americans buried on the acreage.

Officials with Kansas City's Aviation department are seeking a court order to relocate remains from the cemeteries to a site near Tiffany Springs Park.

The graves would be moved to make way for future expansion of the Kansas City International Airport and KCI Motorsports Park, a "high performance motor sports country club" racetrack for high performance motor sport racing.

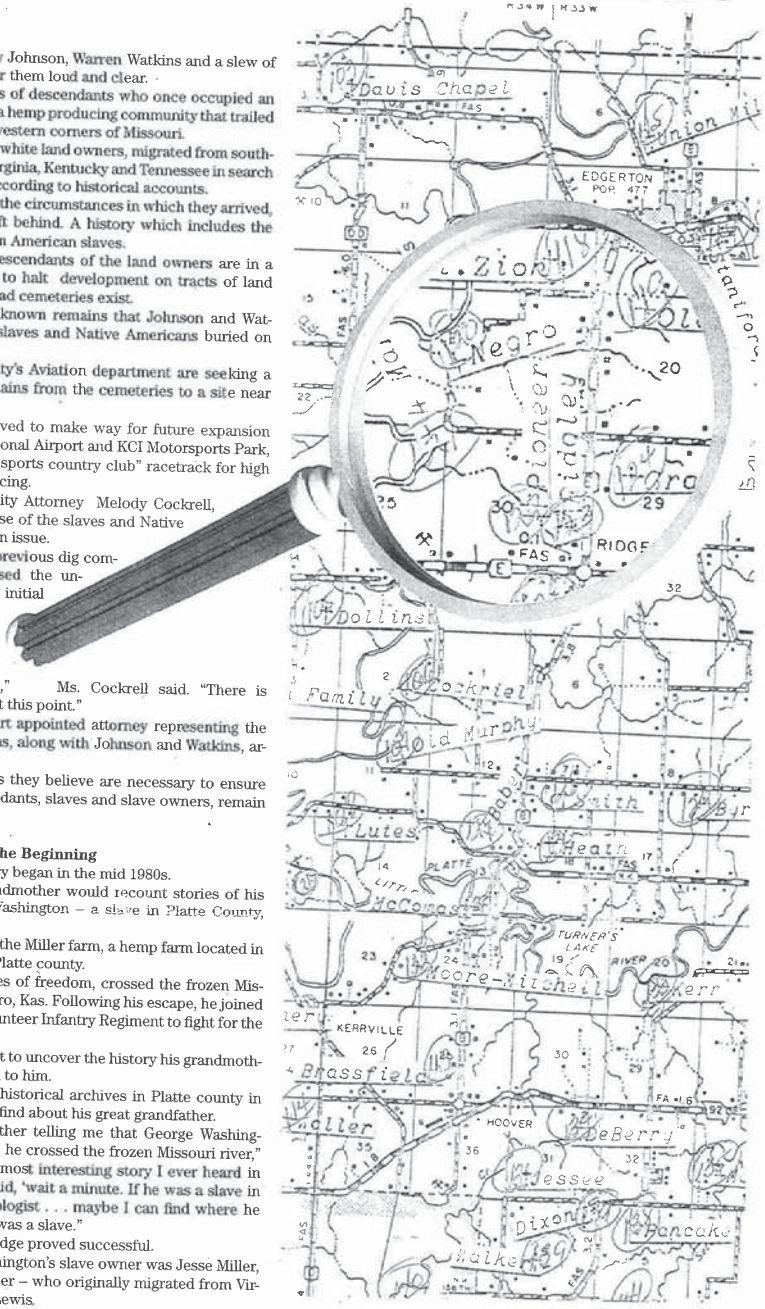
According to Assistant City Attorney Melody Cockrell, the unknown remains – those of the slaves and Native Americans – are no longer an issue.

Lack of evidence from a previous dig commissioned by Johnson erased the unknown remains from the initial petition, she said.

"Having no factual information, we removed the allegations of any slave remains being found," Ms. Cockrell said. "There is nothing for the court to do at this point."

But Robert Shaw, the court appointed attorney representing the known and unknown remains, along with Johnson and Watkins, argue otherwise.

And, they are taking steps they believe are necessary to ensure that the history of all descendants, slaves and slave owners, remain undisturbed.



Continued on page 4

The Beginning

Johnson's road to discovery began in the mid 1980s.

As a child, Johnson's grandmother would recount stories of his great grandfather, George Washington – a slave in Platte County, Mo.

Washington was a slave of the Miller farm, a hemp farm located in the southeastern regions of Platte county.

Washington, lured by hopes of freedom, crossed the frozen Missouri River in 1862 to Quindaro, Kas. Following his escape, he joined the First Kansas Colored Volunteer Infantry Regiment to fight for the union during the Civil War.

Those stories fueled a quest to uncover the history his grandmother had once vividly described to him.

That quest led him to the historical archives in Platte county in search for anything he could find about his great grandfather.

"I remember my grandmother telling me that George Washington didn't cross the Potomac, he crossed the frozen Missouri river," Johnson said. "This was the most interesting story I ever heard in my life. In the mid-1980s, I said, 'wait a minute. If he was a slave in Platte county, I'm an archaeologist . . . maybe I can find where he was manumitted – where he was a slave."

Johnson's quest for knowledge proved successful.

His research revealed Washington's slave owner was Jesse Miller, the husband of Margaret Waller – who originally migrated from Virginia with her first husband, Lewis.

Event Presents Continued from front page

law of land but it wasn't right. We take incremental steps to heal the past. And this was one of them."

Johnson, a local archaeologist, shared the same sentiments.

Johnson's great grandfather, George Washington, was a slave on the Miller farm --one of the hemp farms that dominated the region.

Tracing through historical archives and forming friendships with descendants of Washington's owners, Johnson was able to compile a 60-page report chronicling the history of the area.

Johnson, who spent years sifting through artifacts on the acreage, said he never imagined that so many people would unify to preserve the area's history.

"That's my great grand daddy's slave owner," Johnson said, pointing to a century old headstone bearing Jesse Miller's name. "I am extremely humbled to see this group of people at this remote site. I never thought in 10,000 years I'd see people (celebrating on this tract of land. This is good stuff."

"We stand together, today, to pledge to you (our ancestors) that we stand today as partners, we the living amongst ourselves and we the living to you the forgotten," said Oralee Watkins, a descendant of slaves believed to be buried on the site. "We stand together today to tell you these changes, progress and fulfillment of democracy's promise came about because our shared belief in the sanctity of life, and in our fundamental love for each other and ourselves.

"We each may hear different pastors, but in community, we act together," Ms. Watkins continued. "We each may celebrate a universal power at different times, and in slightly differing traditions, but in community we are one."

Ms. Watkins has filed a civil lawsuit against Mark VanLoh, director of the Kansas City's Aviation department, seeking punitive damages for his alleged violation of federal laws and statutes concerning the disinterment of human remains.

Regardless of what legal battles lie ahead, UMKC professor Mark Raab sees the stories of those buried on the acreage as launching points to creating a dialogue about America's flaws.

"There are stories here both black and white that are part of America," Raab said. "America is not a finished product. The border wars are over, but we've got a long way to go to make America better place to live."

permission to remove all of the remains from these cemeteries and reinter them in a centrally located fifth cemetery not in the path of development.

The real holdup is the unmarked slave cemetery.

Warren Watkins, Jackson and others are sure that it's on that same 300 acres. Shafer appointed Shaw to represent these unknown dead, and today, at the Platte County Courthouse, Shaw is asking Shafer's permission to go digging for them.

Lowell Gard, an attorney for the city, steps up to his lectern and complains to Shafer that the city already hired an archaeologist, Craig Sturdevant, who drove a backhoe into one of the areas thought to be the slave cemetery, dug and found nothing, at a cost of $5,000. Shaw wants any new excavation to be done quickly and wisely, "so we don't spend another several months just prospecting."

Gard adds that he has doubts about dowsing. Sometimes called "witching" or "divining," the practice involves walking over an area with a metal or wood rod held parallel in each hand; when the rods cross, they supposedly indicate the presence of water, metal or other objects underground. Platte County cemetery sextons and amateur historians use the method to locate underground graves. "The scientific basis for it, I think, is nearly nil," Gard says.

Shaw replies that Warren Watkins and others don't want to search the entire 300 acres, only a small, specific site identified through locals' stories, dowsing rods, and deliberately placed red rocks thought to mark the graves. The city won't spend a dime, Shaw explains, because there is a volunteer archaeologist willing to do the work for free.

Shafer grants Shaw's motion to let an archaeologist check out the site, provided that the work is completed before December 10, the next scheduled court date in the cemetery matter.

When the hearing ends, the benches empty and a small group convenes in the courthouse hallway. Warren Watkins explains the court proceedings to Jackson, who couldn't hear.

"They want to move it, but after so many years, I wonder if they know what they're doing," Jackson says.

Jackson and her 104-year-old aunt, Katharine Mace, remember Mace's great-grandmother, who was born into slavery and was buried somewhere in Platte City. She was missing a leg but could still ride a horse. "She sat in a rocking chair, and she was good, as far as her mind was concerned, but she couldn't walk so well because they'd mistreated her," Jackson says.

Standing just outside the courtroom doors is a gray-haired woman with a stick-straight back and a rolled-up cemetery map clenched under one arm.

Unlike the city's maps, Shirley Kimsey's includes a tiny square marked "Slave Cemetery." Kimsey says representatives of the State Historical Society of Missouri told her that she knows more about Platte County's dead than anyone in their office. People who visit the courthouse for historical information are directed to Kimsey's clothing shop, called Shirley's Fashion Center, across the street from the courthouse. Near the dressing rooms, she keeps a microfiche machine with articles dating back to 1871.

Platte County planners asked Kimsey to use her dowsing rods to determine the placement of unmarked graves before a cell-phone tower was erected on land near a cemetery.

"I think they're full of bull," Kimsey says of the city's attorneys. "Cemeteries all over the United States use witching rods."

Kimsey would prefer that none of the graves on city land be disturbed. She's not against progress, but she doesn't trust the city to care properly for the graves that stand in the way of development.

"I don't care what color, what race or anything else they are," Kimsey says. "Leave my dead people alone."





Above: Katharine Mace, whose maternal grandmother was born a slave, will celebrate her 105th birthday this month. Left: Ernestine Mace, Katharine's daughter.

It's hard to imagine early pioneers resting in peace on airport land. The intermittent roar of jet engines is sometimes so loud, you can't hear your own footsteps crackling over sheared acres of cornstalks and brush.

Kimsey has traipsed over this property and many other parcels, documenting 218 of Platte County's 220 cemeteries. Her interest began when she looked up the genealogy of her family and learned that her great-grandfather came to Platte County from Virginia, riding shotgun on a wagon train when he was 18 years old. He registered for 80 acres to farm and rode back to Virginia on horseback to fetch the rest of his family.

She married into the Kimsey family. One of her late husband's relatives, Benjamin Kimsey, was a Platte County farmer who acquired the land in 1843 and owned four slaves, according to old census data. Another relative, Wade Hampton Kimsey, worked for a monument company and placed many of the tombstones in the Platte County Cemetery.

Starting in the 1970s, Shirley Kimsey tended to the graves of these Kimseys, and perhaps 20 others, at least twice a year. The cemetery was deep into the fields, so the farmer who owned the land let Kimsey jump on the back of his tractor, and he took her there himself.

Kansas City acquired the acreage in the 1980s in order to build up the area surrounding KCI. The city leased the land to farmers while waiting for development to catch up to it.

By 1990, a different farmer leased the property, and Kimsey says she noticed that earth-moving equipment had been creeping closer to the plots. She contacted the Aviation Department and asked the person in charge of the city-owned farmland to make sure the cemetery was protected.

In May 1992, some distant relatives of Kimsey's husband came to visit and asked for a tour of the Kimsey cemetery.

"Well, we get down there, and — wait a minute, am I on the wrong hill?" Kimsey recalls. "And so I looked in both directions to see whether I'm in the wrong place, and, well, I'm not. Finally, I see this one tree has been left, and little Nancy's tombstone is lying against this tree. All the rest of the tombstones are gone, and all the rest of the trees that were around there are gone ... well, I will guarantee you that I came unglued."

The next year, an archaeologist named Jimmy Johnson came to Kimsey's shop. He'd been researching landholding archives in the courthouse when a clerk suggested that he cross the street and seek her help.

Johnson told her that his great-grandfather, who'd taken the name George Washington, was a slave in Platte County during the 1840s and 1850s. He said he learned through stories told by his grandmother that when Washington was a year old, he was given to farmer Jesse Miller and his wife, Margaret Jones-Miller, as a wedding gift from the bride's father.

Washington's master, Jesse Miller, was a Southern sympathizer in the years leading up to the Civil War. In April 1855, Miller took part in a raid on a newspaper in Parkville called the *Luminary*, the Boston-born publisher of which, George S. Park, printed editorials arguing that slavery was bad for business and that Kansas should join the Union as a free state. According to W.M. Paxton's *Annals of Platte County, Missouri* (a history of the families that settled in Platte County in the 1800s — local historians call it "the Bible"), Jesse Miller and a crowd of others stormed the *Luminary* offices, scattered the press's type up and down Main Street and threw Park's press into the Missouri River.

In the winter of 1862, with the Civil War under way, Platte County's slaves were escaping into Kansas, and the now-grown Washington was among them. He ran from the Miller hemp farm, crossed the frozen Missouri River and joined the 1st Kansas Colored Volunteer Infantry Regiment to fight for the Union. He survived the battles and, after the war, married another ex-slave and used the money he'd earned as a soldier to buy land in the Wakarusa valley outside Lawrence. He raised a family there and died in 1931.

Johnson told Kimsey that he was planning to complete an archaeological study of the Millers' farmhouse, and he wished to meet the descendent of his great-grandfather's master, Gordon Miller.

Kimsey knew Gordon Miller. He was a retired insurance executive with his own company. The office was just down Main from Kimsey's shop.

Kimsey was nervous about telling Miller the news. Old sentiments persist in some parts of Platte County.

"It used to be that if you even mentioned a black person around Gordon, he'd take your head off," she says.

But Miller surprised Kimsey. She says he told her, "All my life, I've been told how I'm supposed to feel about colored

continued on page 14

continued from page 13

people. But I woke up one morning and I thought, Gordon, what has a colored man ever done to you? Nothing.'" He agreed to meet Johnson.

Johnson says his friends call him Indiana Johnson because of his style; he wears a fedora, drives a black Jaguar and speaks precisely, with swagger. In the introduction to his report on the Miller plantation, Johnson wrote of meeting Miller, "It was an emotional experience ... and a tremendous amount of recollection took place. After a few hours of conversation, we all became very good friends."

They talked on the phone every day. Johnson says he and Gordon were as much like family as any two unrelated people could be.



History detectives Warren Watkins, Jimmy Johnson and Olin Miller (left to right)

"We were supposed to collaborate on a book until he cut grass one afternoon, sat to rest under the shade of a tree and never got up." Miller died of a heart attack.

In 1998, KCI officials gave Johnson permission to dig on the Miller plantation. The Missouri Department of Natural Resources' Historic Preservation Program supplied funding for the project. Johnson dedicated the work to the memory of his friend. A handful of Boy Scouts helped him unearth artifacts. Among the items recovered from the Miller root cellar was a handmade iron bolt that could have been used to tie up horses — or slaves.

According to Johnson's report, after Washington escaped, Jesse Miller chained his remaining slaves in the cellar at night in order to avoid losing any more. After the war, Miller tried through the federal courts to recover $500 compensation for his runaway; it's not known whether he collected.

Now, nearly 10 years after Johnson's work at the Miller plantation, he has returned to excavate the area that Kimsey is sure is the slave cemetery. She says she knows because old-timers who were raised in the area told her about it.

Kimsey recalls one elderly man whom people called "Red." She once argued with him over a Platte City proposal to move the courthouse. One day he came to her shop and said, "Shirley, I know we're not always in agreement, but there's one thing I know we will be in agreement on, and that is, down by where I live and where I was raised, there is a slave cemetery, and I don't ever want to see it destroyed." She says he showed her the place on her cemetery map and marked it with a pin.

"There is something about that slave cemetery," Kimsey says. "People who lived in that area have a protective feeling about it. And I don't know why. Maybe they felt guilty about it. Not being proper headstones and such as that."

Another person felt protective of the slave cemetery: Gordon Miller's son, Olin Miller, who took over the family insurance business on Main. Miller helps care for the Miller-Rixey Cemetery, one of the four cemeteries at the airport, and he learned how to dowse for graves from Kimsey.

In May 2006, the Aviation Department notified descendents, including Olin Miller, of the city's intention to move four cemeteries. When Kimsey suggested that the racetrack might also threaten an unmarked slave cemetery, Miller pulled together a search party.

Last February, Miller and his crew visited the Brightwell Cemetery, a tiny, fenced pioneer graveyard on airport property where several tall obelisks date back more than 100 years. "We went out and walked the fence line where they said the cemetery was located. We walked that fence line 400 yards ... at the bottom of the hill, we started finding red granite rocks. Three of us pulled out witching irons and walked the area, grave-dowsing, and began locating graves, and many of them had red-granite rocks at the head of the grave. We had what appeared to be three rows of graves, but the area was so overgrown with small trees and shrubs, even though it was the dead of winter, we had to walk deer paths and cattle paths to get through it."

They thought they'd found about 80 graves. That got Olin Miller thinking. "How many descendents are there, of slaves in the area, who have no idea that they're related?" he says. "Back then, slaves were not schooled. They marked their names with an X if they had [illegible]

sus, there's no one, no church records, nothing to fall back on. Anything prior has to come from what grandparents told parents."

He wanted to somehow notify African-Americans all over Kansas City, in case their families' oral traditions hinted at relatives buried in Platte County.

Miller called the Bruce R. Watkins Cultural Heritage Center in Kansas City, a museum dedicated to the African-American experience and named for Warren Watkins' late uncle Bruce, who in the 1960s was the first black politician to serve on the City Council. A secretary connected Miller with Warren Watkins, who started looking for other descendents.

One other thing was bothering Miller.

"Not until the city filed their lawsuit did we really, formally learn exactly what they wanted to do," he says. "They never would specifically state why they wanted to move the cemeteries, except for the general welfare of the city of Kansas City. When we found out it was for a racetrack — we don't have a Porsche 560 we can go out here and race. We have a car we're content to buy gas for and wondering how to buy the next round of gas. Now these folks want to put a gentlemen's racetrack out here, which most of us will never have the opportunity to set foot on."

Mark VanLoh, the director of the Aviation Department, says the racetrack is good for the city. "They're [FastTrack Group LLC] paying us rent," he tells *The Pitch*. "They took the land as is. It's a lot of rent, too — if I recall, it's approaching $300,000 a year. It's a pretty brilliant plan, I think, for raw land."

After the court granted permission to dig for the slave cemetery, Johnson, Warren Watkins, Kimsey and Miller decided on a date: November 3. The weather was to be sunny and unseasonably warm.

That Saturday morning, Johnson and Miller set out for the dig.

The sign by the country road reads, "KCI Motorsports Park: Future Home."

The undeveloped acres feel solemn in the morning sun. Not far from here, a farmer has taken care to plow around a stand of trees near the on-ramp for the airport. The trees conceal some bricks – all that's left of the Red Crown Tavern where Bonnie and Clyde hid out and eventually engaged in their infamous shootout with Platte County Sheriff Holt Coffey. Sometimes all that preserves history around other step disturbs grasshoppers with black wings. Sparrows wheel overhead. The fall wind bends the shoulder-high grass, making it sound as if someone is walking through the field, just out of sight. For a few moments, it's possible to forget the prairie's loud neighbor; the only reminder of the nearby airport is the gray top of the control tower peeking above the blond-and-green hills.

Johnson parks his black Jaguar just past the swinging metal cattle gate at the beginning of the country road leading to the Brightwell Cemetery. He jumps into Miller's rickety yellow truck full of equipment. A friend of Miller's is already ahead, waiting with a backhoe to sift through the first meter of dirt.

As they bounce over paths of smashed grass, Johnson suspects they should be digging in a different location. Despite the insistence of oral tradition, Miller's and Kimsey's witching rods and the red stones lined in formation, he has doubts.

A quarter-mile past the stone obelisks of the Brightwell Cemetery, they expect to find a handful of locals and some representatives from the airport. Instead, they find a cavalry.

City trucks and cars line the path. Two attorneys for the city and six airport police officers are waiting. The officials are here to keep out anyone not directly involved with the excavation (including a *Pitch* reporter).

Descendents of Platte County pioneers gather in the lobby of the Watkins Brothers funeral home.

Camino (no funeral-home limousines today). Two more cars have followed him in, full of cameras and video equipment to document the scene.

When Kimsey arrives, her car packed with coolers full of sandwiches, airport police officer John Martinez grills her about the coolers' contents. She offers to let him search them, but he relents and lets her through.

Descendents arrive from each of the four threatened cemeteries. An airport police officer questions Bob Werline, a descendent of pioneers at Brightwell, about the person sitting in his truck. He says she is his wife — "Or, at least, she was when we left the house."

Later, Johnson will say he was surprised by the heavy security. Then again, folks are always curious about his work. "Everyone wants to go on an archaeological site. Everyone wants to get a glimpse of the grinning skeletons. You might find a pot of gold. Tutankhamen's arm might be there. Everyone thinks it's a glorified adventure. But it's a lot of work."

For this dirty job, Johnson wears a KU sweatshirt and, rather than his customary fedora, a backward-turned KU cap. Miller's pal Russ Statler operates the backhoe, taking bites out of the dirt and spitting them out slowly as Johnson watches, looking for remnants of a wooden box or pieces of hemp that might have covered the bodies of the dead when Johnson stops the machinery. The gathering of cops, lawyers and locals goes silent and waits for his word. If remains are found, Warren Watkins has plans to receive them at the funeral home and hold onto them for DNA sampling and eventual reburial.

"Ladies and gentlemen," Johnson announces, "No one lives here. Let's cover it back up."

"Just another foot," Miller suggests. But it's not to be.

Later, Johnson will explain, "Two things happened: We either dug in the right cemetery in the wrong place, or the old oral tradition was incorrect and the coordinates were wrong. My gut feeling is, some farmer just took those stones and moved them out of the way so they could plow their crops."

Not finding anything is good, too, Johnson says. He figures he has until December 10, the court date when Shafer will decide the fate of the cemeteries, to craft a legal brief asking permission to dig in another spot. He knows exactly where.

Slaves in Little Dixie, he says, eked out a living close to the families that owned them (unlike in the South, where plantation operations were massive and used scores of slaves). Surely they would have been buried closer to their masters — not in the same cemetery but perhaps just outside the perimeter of places like Brightwell.

"I know they're there," Johnson says. "The locals know it, too. Our first dig should have been at Brightwell. There were slaves buried all around there. It ain't over. You can't stop progress, but I don't want anyone buried under the racetrack."

Miller's disappointment is palpable. "We tried our best to find it," he says. "I know there's a cemetery out there somewhere."

But the search has discovered something else.

"Whatever the differences have been in years past, all those things have been laid aside," Kimsey says.

With his new friends, Warren Watkins will continue his hunt for the descendents of Platte County slaves.

And so, as Miller puts it, "The North and the South are united in this effort of all free men to tell the story of the people who lived in this era of Missouri history."

You can reach Nadia Pflaum at Nadia.Pflaum@pitch.com or call her at 816-218-6773

Chris Babb

From: KCIEA Comments
Subject: FW: KCI Environmental Assessment

From: Lisa Piazza <lisa_piazza@me.com>
Sent: Wednesday, October 10, 2018 11:29 AM
To: KCIEA Comments <KCIEAcomments@landrum-brown.com>; katherine.andrus@faa.gov; Amanda.Burke@dnr.mo.gov
Subject: KCI Environmental Assessment

Good day,

My name is Lisa A.Piazza. I am a descendent of farming families who, lived and died on land that is now KCI airport property. My brother, Thomas M. Levin has already provided details of our ancestry in his letter to you. I too request that important documents that have been left out of the Environmental Assessment be included in the report, such as the one referenced below.* I want to add to the conversation from my own experience. Recently, I returned to my hometown of Kansas City, Missouri to be more near to family, some of whom still live in Platte County. I returned here after several decades in the lowcountry of South Carolina where examples of the preservation of cultural history now abound. Cemeteries of the enslaved and their ancestors are respectfully preserved, situated amongst golf courses, marinas and other resort properties. The story of Reconstruction is finally being told. Thoughtfully organized annual vents are generating tourist dollars. Please take the cultural and natural history of the airport land seriously and create something that gives it the regard it deserves and leaves a legacy to be learned and shared. Don't hide history or destroy it.

P98

Sincerely,

Lisa A. Piazza
4550 Warwick Blvd
Kansas City MO
64111

* The Miller Plantation: An Archeological Interpretation of a Northwest Missouri Antebellum Slave Site-1998, Jimmy S. Johnson, III, Principal Investigator; Cultural Resource Investigations 23PL1470. 23PL1504 & 23PL1507 Kansas City International Airport, Platte County, Missouri – 2009 Prepared for the City of Kansas City, Missouri, Craig Sturdevant, Principal Investigator.

Table H-1 Responses to Comments

Comment Number	Commenter	Comment Summary	Response
A01	Missouri Federal Assistance Clearinghouse	None of the agencies involved in the review had comments or recommendations to offer at this time. This concludes the Clearinghouse's review.	Comment Noted
A02	Missouri Federal Assistance Clearinghouse	None of the agencies involved in the review of the Section 4(f) Statement had comments or recommendations to offer at this time. This concludes the Clearinghouse's review.	Comment Noted
A03	SHPO	The term historic property is a legally defined term that should be defined in the document and used throughout to identify resources as needed. In addition, the terms building, structure, object, site, and district should be used as defined by the National Park Service in relation to eligibility and nomination of properties to the National Register of Historic Places (NRHP).	Final document revised to correct terminology.
A04	SHPO	The report should be updated to include information on the Programmatic Agreement (PA) currently being developed and the suggested mitigation stipulations listed in section 3.10.2.2 should be updated to match those in the PA. In addition, all consulting parties to the development of the agreement document should be listed in the EA. As the type of agreement document required for resolving adverse effects has changed, our office recommends that the FAA reach out to the ACHP to notify them of the change and invite them to participate in the consultation process.	This Final document has been updated to include an overview of the mitigation measures contained in the Programmatic Agreement (PA). The PA is included in Appendix C. In addition, all consulting parties to the development of the PA document are listed in the EA. The FAA contacted the ACHP via email dated September 25, 2018, October 5, 2018, and November 16, 2018 to notify them of the change from a MOA to a PA and to invite them to participate in the consultation process.
A05	SHPO	Section 3.8.1 introduces the airport as a historic property and Section 3.10.1.3 identifies that it is	Initial planning and design of the passenger complex was initiated in 1966 and construction commenced in 1968, this

Comment Number	Commenter	Comment Summary	Response
		less than fifty years old, but does not go on to discuss how Criterion G is applicable in this case.	district does not have to meet Criterion Consideration G for properties that have achieved significance within the last fifty years, even though completion of the terminals overlaps the fifty year period by a few years (See Appendix C, FAA Memo, Review of Findings under Section 106 for the Kansas City International Airport Terminal Replacement Project – National Register Eligibility of Resources in the Direct APE, dated November 15, 2018).
A06	SHPO	Exhibit 3-3 is a map entitled "Structures in the Direct APE" and includes a table with the dates the buildings were constructed, but no rationale for its inclusion was in the text. Please explain its relevance and how it relates to the airport historic district.	The Structures in the Direct APE exhibit has been removed from the Final document to avoid confusion. Please refer to Appendix C, FAA Memo, dated November 15, 2018, Review of Findings under Section 106 for the Kansas City International Airport Terminal Replacement Project – National Register Eligibility of Resources in the Direct APE and the October 2018 Kansas City International Airport Architectural and Historical Property Evaluation for the Proposed Replacement Terminal Project.
A07	SHPO	Section 3.10.2.2 Direct Impact section states, "There would be no direct impacts to any other structures eligible or potentially eligible to the National Register of Historic Places. The Parking garages would not be considered eligible and contribute nothing to the historic nature of the terminal buildings." This needs to be edited to reflect the fact that the airport is a historic district with applicable areas and periods of significance and contributing and non-contributing resources.	This Final document has been revised to reflect KCI as a historic district. Please refer to Appendix C, FAA Memo, dated November 15, 2018, Review of Findings under Section 106 for the Kansas City International Airport Terminal Replacement Project – National Register Eligibility of Resources in the Direct APE and the October 2018 Kansas City International Airport Architectural and Historical Property Evaluation for the Proposed Replacement Terminal Project.
A08	SHPO	Section 3.10.2.2 for Direct Impact does not reference the continued consultation that will result in monitoring and continued investigation into the possibility of buried resources.	This Final document has been revised to reference the continued consultation. “Therefore, with the Programmatic Agreement there would be continued consultation that will result in monitoring and continued investigation into the possibility of unknown buried resources.”

Comment Number	Commenter	Comment Summary	Response
A09	SHPO	Section 3.10.2.2 for Traditional Cultural Properties (TCP) makes statements that imply that if the airport were determined to be a TCP, the airport would have do research and prepare a nomination for the property to the NRHP; however, this is not the case and the section should be reworded.	The text under Section 3.10.1.3 for Traditional Cultural Properties has been revised.
A10	SHPO	Table 3-7 “Past, Present, and Foreseeable Future Actions" lists expansion and renovations to the airport and Appendix F contains a map entitled "Future Airport Layout Plan." In order for our office to assess effects of the foreseeable actions and cumulative effects please provide our office with the scope, plans, and locations of this future development. In addition, Table 3-7 references the Intermodal Business Center Phase II and has notations indicating SHPO consultation was completed in 2008. Should this project move forward in the future, consultation with this office will need to resume due to the length of time between review and action	Potential projects beyond 2024, such as a potential third parallel runway shown on the current KCI Airport Layout Plan would be considered speculative and too far out into the future to realistically predict potential impacts. These post 20-year projects at KCI were shown on the Airport Layout Plan in order to preserve the land for future aviation development and consideration during the FAA airspace review process. The exact scope, plans, and locations have not been fully determined and are not ripe for a decision by FAA. EA Section 3.18.1 was revised to clarify information. An environmental assessment (EA) and Section 106 consultation for the Intermodal Business Center was completed in 2008. The Business Center development includes a group of manufacturing, commercial, and industrial buildings used for final assembly, warehousing, and transportation of freight using multiple modes of transportation. The development is being constructed in phases as tenants and their individual needs are determined. The overall boundary of the Business Center development contains approximately 700 acers and will not change as the project site is developed. A cultural resources study of the Trammel Crow Tract which encompasses the Business Center boundaries was completed in 2007. No

Comment Number	Commenter	Comment Summary	Response
			significant cultural resources eligible for the NRHP were found in the project area. The FAA determined and the SHPO concurred, dated June 16, 2007 “No Historic Properties Affected.” Since 2008, development of the site has begun with four buildings already constructed. Construction of additional buildings within the same Project Site is ongoing.
A11	SHPO	Appendix C contains copies of letters from our office; however, not all pages of these communications appear in the document. Please revise the appendix to include all pages of documentation.	Appendix C has been revised to include all pages of the documentation. Specifically, pages 2 and 4 of the correspondence from SHPO to L&B dated August 21, 2013 have been added.
A12	EPA	We have reviewed the Draft EA for the project and, provided the required local, state and federal regulations, permit conditions and best management practices discussed within the EA are implemented and followed, EPA believes that NEPA compliance and environmental effects are adequately considered in the document for this project. EPA supports the commitment to recycle and reuse existing materials and implement sustainable construction, building, and operational measures where reasonable and practicable. We commend your continued coordination efforts with various other local, state and federal agencies and entities throughout the development of the project and we encourage ongoing coordination as design planning and construction activities commence.	Comment Noted

Comment Number	Commenter	Comment Summary	Response
A13	U.S. Department of the Interior	The Department's review concurs with the determination that there is not a feasible and prudent alternative to this use of 4(f) resources, and the proposed action includes all possible planning to minimize harm to the archeological resource resulting from the use. The Department determines that if the Memorandum of Agreement with the SHPO and tribes is fully executed, it will have no objection to the 4(f) evaluation and concur with the measures to minimize and mitigate the use of the archeological site.	Comment Noted
P01	Mark Raab, Watkins Foundation	The draft EA raises significant questions about whether the airport is properly complying with FAA and other Federal environmental guidance in how it manages this land development.	The City of Kansas City, Missouri, Aviation Department (KCAD) is responsible for the operations of KCI and does so in compliance of all FAA regulations. The Federal Aviation Administration (FAA) is the lead Federal agency to ensure compliance with NEPA and other applicable federal requirements for this Proposed Action; therefore, this EA has been prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*; and FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions*.
P02	Mark Raab, Watkins Foundation	The draft EA's discussion of cumulative environmental effects (pages 88-89) is a materially inaccurate representation of the airport's Federal environmental protection responsibilities.	The scale of the Proposed Action and the extent of FAA involvement define the scope of the Section 106 review, including FAA's obligation to identify historic properties, assess effects, and develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties. In this case, the Proposed Action is a proposed replacement terminal that would not expand the airport capacity.

Comment Number	Commenter	Comment Summary	Response
			FAA is obligated under 36 CFR 800.4(b)(1) to make a "reasonable and good faith effort" to identify historic properties. Because the nature of this action involves replacement of an existing terminal with a proposed terminal of approximately the same footprint, primary impacts of this Proposed Action are related to that direct impact. Per FAA orders, the analysis included consideration of direct, indirect, and cumulative impacts including potential impacts from construction and demolition activities as well as operation of the Proposed Action after opening.
P03	Mark Raab, Watkins Foundation	Inaccurate statements in the draft EA pose questions about proper conveyance of airport land to private developers.	No airport land is being conveyed to private developers. Final document revised to clarify. EA Sections 3.11.1 and 3.18.1 were revised to clarify information.
P04	Mark Raab, Watkins Foundation	The final EA should document cumulative environmental effects of past, present and foreseeable airport land development, effects which are likely to accelerate after new terminal construction.	The EA does document cumulative effects in Section 3.18 and Section 3.13.2.4 was updated to clarify that the Proposed Action would not induce growth in aircraft operations. The Proposed Action is anticipated to provide 39 gates upon opening with potential future expansion to 42 gates. Therefore, the Proposed Action would have less gates than that of the existing Terminals A, B, and C. As stated in Chapter 1 of this Final EA, the purpose of the Proposed Action is to provide a better customer experience for passengers and to ensure continued safe, secure and efficient airport operations by providing space for current and potential future demand while avoiding duplication of services and systems. The Proposed Action would not induce or cause unforecasted growth in aircraft operations that would accelerate the need for additional projects. The number and type of aircraft would be the same for the No Action Alternative as the Proposed Action for the same future year.

Comment Number	Commenter	Comment Summary	Response
P05	Mark Raab, Watkins Foundation	This statement's convoluted and ambiguous phrasing is difficult to decipher. However, it seems to assert that development projects on airport property fall into two categories. One category includes projects subject to Federal environmental laws because they are undertaken by a Federal agency, require a Federal permit or funding or are otherwise under "direct" Federal jurisdiction. The second category includes projects involving "purely private property off airport property," obligated only to local and state environmental regulations. This distinction poses an important question: Is there a category of "purely private" development of airport property exempt from Federal environmental laws in the manner implied in the draft EA?	Development of airport property is not exempt from Federal environmental laws. The property being referenced in the comment is private property. KCI does not own or control this property and the proposed private development is not being initiated by KCI. Therefore, there is no Federal action which would require the FAA to complete an environmental review of the private development. This Final document was revised to clarify that the private development is on private property.
P06	Mark Raab, Watkins Foundation	This comment raises questions about whether the statements found on pages 88-89 of the draft EA are materially inaccurate and misleading. Based on Ms. Andrus' comments, conveyance of airport land to a private developer is generally a Federal undertaking per se, triggering a NEPA/Section 106 environmental study, even if the developer is not otherwise Federally obligated or receiving a Federal permit or funding.	Conveyance of airport land to a private developer would be considered a Federal Action. However, no airport land is being conveyed to private developers. The property being referenced in the comment is and always has been private property. KCI does not own or control this property and the proposed private development is not being initiated by KCI. Therefore, there is no Federal action which would require the FAA to complete an environmental review of the private development. This Final document was revised to clarify that the private development is on private property.

Comment Number	Commenter	Comment Summary	Response
P07	Mark Raab, Watkins Foundation	If this parcel is private property, why is it within the EA's indirect APE; i.e., subject to NEPA/Section 106 study by definition?	It is common for an indirect APE to extend beyond an airport property boundary. The indirect APE is the area where indirect impacts due to noise or changes in view are evaluated. Noise contours regularly extend beyond the airport property boundary. Since no physical (direct) disturbance would occur in this area, potential resources below ground were not evaluated because they would not experience any change in noise or view.
P08	Mark Raab, Watkins Foundation	The land parcel in question is listed for sale by a private land broker. Is that an example of the "purely private" category of airport development described in the draft EA; i.e., excluded from compliance with FAA environmental regulations? If so, why is the land subject to NEPA/Section 106 study in the current EA? More unanswered questions: Is the sale parcel included in the Airport Layout Plan (ALP) mentioned above, and is its sale subject to an FAA-approved ALP amendment and a required NEPA/Section 106 study? This is a concrete example of the EA's confusing rationale for when the airport is required to comply with FAA environmental regulations and when it isn't.	Please see Responses P06 and P07. Since the parcel is not owned by the Airport, and therefore, not being sold by the Airport, there is no Federal action that would require NEPA/Section 106 evaluation of the private sale and proposed private development.
P09	Mark Raab, Watkins Foundation	The reference to "purely private development off airport property" (EA draft, page 88) creates more confusion. How is it determined when "purely private development" of airport land is "off airport property"? Is it when airport property is leased or sold to a private developer or designated for such conveyance? If so, would such a rationale violate the KCIA's contract with the FAA by allowing the land to be developed without following the FAA	Please see responses P06 and P08.

Comment Number	Commenter	Comment Summary	Response
		environmental regulations described by Ms. Andrus?	
P10	Mark Raab, Watkins Foundation	In our opinion, these data are far from adequate for assessing cumulative environmental effects. Table 3-7 does not address the number of projects before 2013, private and airport-only, although this number is likely substantial (see below) and would give a better idea of the pace of land development in the past and perhaps to project future developments. Crucially, there is no indication in this discussion whether private developments on airport land, during any period, were carried out with FAA-approved ALP amendments and, following Ms. Andrus' analysis, if these projects were deemed Federal actions requiring NEPA and NHPA compliance	The cumulative effects analysis in EA Section 3.18 encompassed the geographic boundaries beyond the immediate area of the Proposed Action, and a reasonable timeframe based on the nature and extent of the potential effects, including past actions and foreseeable future actions, in order to capture these additional effects. Any development on Airport property that was a Federal Action required NEPA and NHPA compliance.
P11	Mark Raab, Watkins Foundation	This claim implicitly defines "foreseeable" as a single project already underway at the airport; i.e., the LogisticsCentre IV Intermodal complex noted in Table 3-7. Nor does this analysis factor in minimum to maximum projected effects of the expanded aviation capacity that the new terminal will certainly cause; for example, foreseeable effects of more flights involving intermodal commerce.	Please see Response P04. Potential projects beyond 2024 would be considered speculative and too far out into the future to realistically predict potential impacts. The exact scope, plans, and locations have not been fully determined and are not ripe for a decision by FAA.
P12	Mark Raab, Watkins Foundation	We therefore request that the EA should not be accepted until the following are documented in the EA: ● A list of all land conveyances to private land developers at the airport, past or present.	These requested lists are not required by the FAA to evaluate the environmental impacts of the Proposed Action. The Proposed Action would occur entirely on KCAD property and would not change the current land use designation of the Airport. No property would be acquired or sold as part of the Proposed Action.

Comment Number	Commenter	Comment Summary	Response
		● A list of FAA-approved ALP amendments related to privately-developed airport land. ● A list of private developments at the airport that required NEPA and NHPA review, referenced to resulting compliance reports.	
P13	Mark Raab, Watkins Foundation	For purposes of CE analysis, we believe the proper frame of reference is the airport's approximately 53-square-miles of land.	FAA 1050.1F Desk Reference Section 15.2 states "The study area for cumulative impacts analysis is the same area defined for a project's direct and indirect impact analysis. Thus, the study area will be different for each impact category." The development of the Cumulative Impact Study Area(s) for this evaluation is consistent with the FAA 1050.1F Desk Reference using the Detailed Study Area and the specific study areas identified for each resource category.
P14	Mark Raab, Watkins Foundation	The proposed terminal logically increases the airport's capacity for this type of rapidly increasing commercial activity. The new airport is expected to significantly increase passenger and air freight traffic. It is thus reasonably foreseeable that airport expansion will stimulate more airport land development.	Please see Response P04. The Proposed Action does not include any specific facilities designed to induce or increase the capacity for air freight or cargo operations.
P15	Mark Raab, Watkins Foundation	What if foreseeable future actions consist of the leases and sales of airport land to private developers discussed above? If these conveyances are Federal actions, as Ms. Andrus' analysis suggests, it seems logical that these actions are subject to compliance with the NEPA and Section 106 of the NHPA.	Any future land development on airport property and triggering a federal action would be subject to NEPA. Currently there are no such actions proposed by KCAD that are ripe for a decision. Potential projects shown in the Airport's Future Airport Layout Plan would be considered speculative and too far out into the future to realistically predict potential impacts.
P16	Mark Raab, Watkins Foundation	The draft EA's assertion that the proposed terminal will have no CE is not warranted. Based on the comments above, we believe the final EA	The level of cumulative impacts anticipated to occur within the environmental resource categories is not significant due to the types of past, present, and reasonably foreseeable future

Comment Number	Commenter	Comment Summary	Response
		must provide more detailed information with which to analyze cumulative environmental effects than the brief, confusing and inaccurate statements in the current EA draft.	projects, the extent of the built environment in which they would occur, the lack of certain environmental resources in the area, and the mitigation measures identified for the Proposed Action. For these reasons, the discussion in EA Section 3.18 adequately addresses the cumulative effects of the proposed action.
P17	Mark Raab, Watkins Foundation	The airport's response to the Foundation's consultation request was categorical exclusion of African Americans and other minorities from EJ consideration, based on inexplicable use of aviation software designed to model environmental effects of jet noise and other aircraft performance factors.	FAA Oder 1050.1F, Desk Reference: An environmental justice analysis considers the potential of Federal actions to cause disproportionately high and adverse impacts on low-income or minority populations living within or near the study area. DOT Order 5610.2(a) provides the following definition for the types of adverse impacts that should be considered when assessing impacts to environmental justice populations: Adverse effects means the totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to: bodily impairment, infirmity, illness, or death; air, noise, and water pollution and soil contamination; destruction or disruption of man-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community's economic vitality; destruction or disruption of the availability of public and private facilities and services; vibration; adverse employment effects; displacement of persons, businesses, farms, or nonprofit organizations; increased traffic congestion, isolation, exclusion, or separation of minority or low-income individuals within a given community or from the broader community; and the denial of, reduction in, or significant delay in the receipt of, benefits of DOT programs, policies, or activities. Per FAA Order 1050.1F, Exhibit 4-1: the factors to consider that may be applicable to environmental justice include, but are not limited, to a situation in which the proposed action or alternative(s) would have the potential to lead to a

Comment Number	Commenter	Comment Summary	Response
			disproportionately high and adverse impact to an environmental justice population due to: - Significant impacts in other environmental impact categories; or - Impacts on the physical or natural environment that affect an environmental justice population in a way that the FAA determines is unique to the environmental justice population and significant to that population. A review of those impact categories that relate to the Airport's neighboring communities was conducted. These impact categories include, air quality, noise, compatible land use, light emissions and visual impacts, and socioeconomic impacts. According to the applicable sections in this EA, there are no significant impacts to any of the impact categories listed above. In addition, there are no environmental justice populations living in the General Study Area. As described in Section 3.14.2 of the EA, FAA determined that the Proposed Action would not disproportionately impact any minority or low income populations within the General Study Area. FAA's Guidance on Using the Aviation Environmental Design Tool (AEDT) to Screen for Potential Environmental Justice Populations was used in this analysis. The AEDT Version 2d was used to identify existing census block groups within the General Study Area using the U.S. Census's American Community Survey (ACS) data. AEDT was used to determine which census block groups are composed of 50% or more minority populations and/or 50% or more low income populations. As described in Section 3.14.2 of the EA, according to the data there were no environmental justice populations identified within the General Study Area.

Comment Number	Commenter	Comment Summary	Response
P18	Mark Raab, Watkins Foundation	Past legal action involving airport historical resources poses a significant question about whether the airport has a conflict of interest in assessing EJ issues.	The FAA is the lead Federal agency to ensure compliance with NEPA and other applicable federal requirements, including those related to environmental justice, for this Proposed Action not KCAD.
P19	Mark Raab, Watkins Foundation	The draft EA should be amended to identify archaeological resource management alternatives, based on consultation with the African American EJ stakeholders.	The scale of the Proposed Action and the extent of FAA involvement define the scope of the Section 106 review, including FAA's obligation to identify historic properties, assess effects, and develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties. In this case, the Proposed Action is a proposed replacement terminal that would not expand the airport capacity. FAA is obligated under 36 CFR 800.4(b)(1) to make a "reasonable and good faith effort" to identify historic properties. Because the nature of this action involves replacement of an existing terminal with a proposed terminal of approximately the same footprint, primary impacts of this Proposed Action are related to that direct impact. The Proposed Action does not include any potential direct or indirect impacts to known archaeological or cultural resources. A Programmatic Agreement has been prepared between the FAA, KCAD, Missouri State Historic Preservation Office (SHPO), Osage Nation, Kaw Nation, Pawnee Nation, and the Ponca Tribe of Oklahoma, which includes an unanticipated discovery plan to address any inadvertent archeological or cultural resource discovery that may occur during routine subsurface disturbances of the Proposed Action. Furthermore, it includes that an archaeological monitor be present during certain construction activities.

Comment Number	Commenter	Comment Summary	Response
P20	Mark Raab, Watkins Foundation	Does this mean, then, that African Americans and other non-Native American minorities are differentially excluded by the AEDT model from EJ considerations? This presumably includes using non-sensical applications of aviation software to avoid the formally stated EJ concerns of African Americans with clear historical links to documented KCIA archaeological resources.	Please see EA Section 3.14.2 and Response P17. FAA's Guidance on Using the Aviation Environmental Design Tool (AEDT) to Screen for Potential Environmental Justice Populations was used in this analysis. According to the data there were no existing environmental justice populations identified within the General Study Area.
P21	Mark Raab, Watkins Foundation	There are claims that slave burials may exist in or in proximity to the four historic cemeteries. The EA should properly acknowledge these links in evaluating EJ issues.	Please see EA Section 3.10.1.2. The Proposed Action would not result in any impacts to cemeteries. In June 2018, an archeological and cultural resource survey was conducted of the Direct APE in compliance with Section 106 of the NHPA. No archeological or cultural resources were discovered during the survey and ground testing. A Programmatic Agreement under Section 106 of the National Historic Preservation Act (Section 106) has been developed, which includes an unanticipated discovery plan to assist with any inadvertent archeological or cultural resource discovery that may occur during routine subsurface disturbances of the Proposed Action.
P22	Mark Raab, Watkins Foundation	Here, one might also question whether the airport has a conflict of interest that undercuts its objectivity in evaluating EJ compliance. Having failed to prevail in its 2008-09 attempt to move historic cemeteries on airport land, can KCIA be relied upon to acknowledge African Americans' links to airport historical resources, if such acknowledgement may cloud the airport's future attempts to move historic cemeteries?	The FAA is the lead Federal agency to ensure compliance with NEPA and other applicable federal requirements, including those related to environmental justice, for this Proposed Action not KCAD.

Comment Number	Commenter	Comment Summary	Response
P23	Mark Raab, Watkins Foundation	We request that the draft EA be amended to write African Americans into history. This should be done by addressing the EJ issues raised by the Watkins Foundation and other representatives of the Kansas City African American community.	The scale of the Proposed Action and the extent of FAA involvement define the scope of the Section 106 review, including FAA's obligation to identify historic properties, assess effects, and develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties. In this case, the Proposed Action is a proposed replacement terminal that would not expand the airport capacity. FAA is obligated under 36 CFR 800.4(b)(1) to make a "reasonable and good faith effort" to identify historic properties. Because the nature of this action involves replacement of an existing terminal with a proposed terminal of approximately the same footprint, primary impacts of this Proposed Action are related to that direct impact. FAA's EJ analysis addresses the potential environmental justice implications of the proposed action. See EA Section 3.14.2. Please also refer to EA Section 3.10.1.3 and Response P82 with regard to TCP.
P24	Mark Raab, Watkins Foundation	"Deep testing" of the new terminal construction area is based on second-hand data of unknown scientific reliability.	In June 2018, an archeological and cultural resource survey was conducted of the Direct APE in compliance with Section 106 of the NHPA. The survey included an archaeological background records review and an intensive pedestrian survey with shovel testing and mechanical trenching by a 36 CFR Part 61 qualified archaeologist. No archeological or cultural resources were discovered during the survey and ground testing. The SHPO concurred with the results of this survey, August 14, 2018.
P25	Mark Raab, Watkins Foundation	The Section 106 report mysteriously omits previously documented archaeological data of exceptional significance to African American and U.S. history.	The Phase I Archaeological survey focused on the Direct APE where there was a potential for physical disturbance from the Proposed Action. The survey revealed a low potential for significant cultural resources given to the Proposed Action being entirely contained within the KCI Airport's existing terminal area,

Comment Number	Commenter	Comment Summary	Response
			which showed evidence of prior disturbances (lacking a top soil, truncation, mottled, reverse stratigraphy, or having imported gravels and angular concrete fragments). Please see EA Section 3.10.1.2.
P26	Mark Raab, Watkins Foundation	The Section 106 report fails to acknowledge the airport's legal conflict of interest in evaluating airport archaeological sites, undermining its credibility as a fair broker of the current environmental assessment.	An archaeological contractor with a 36 CFR Part 61 qualified archaeologist was selected to conduct the Phase I Archaeological survey. The results of the survey were provided to the FAA and the SHPO who concurred with the methodology and the results of the survey. Please see EA Section 3.10.1.2.
P27	Mark Raab, Watkins Foundation	These methods fall into two categories. One of these is "shovel test pits" (STPs) and mechanically excavated trenches. The second category is the most technically challenging, involving soil/sediment cores or probes capable of reaching depths between approximately 10 to 20 meters below the surface of the current airport terminal complex. These deep cores are the most problematic part of Golder's findings.	The Phase I Archaeological survey subsurface investigations complied with the Missouri SHPO's Guidelines for Phase I Archaeological Surveys and Reports. Both shovel testing and mechanical trenching (deep testing) were conducted. In a separate effort unrelated to the Phase I Archaeological survey, borings were conducted for a geotechnical engineering evaluation to assist with the proposed design and construction of the new airport terminal, parking garage and pavements. These borings were not directly conducted as part of this Phase I Archaeological survey. The samples from the borings were saved, labeled, and secured on airport property. The 22 borings completed showed that the existing KCI Airport and the proposed location of the new terminal rests on mostly imported material that was used to make the previously existing landform level to accommodate the placement of the existing airport. Since the materials from the borings were saved, they were looked over by the archaeologist. No cultural resource material was found in the boring samples. The review of the boring samples by the archeologist was not considered to be the deep testing and was not the basis of the

Comment Number	Commenter	Comment Summary	Response
			archaeologist's findings. Please refer to Appendix C, Golder Report, Section 6.2.2 for discussion on how these borings were used.
P28	Mark Raab, Watkins Foundation	There are significant problems with using these data for detecting possible buried archaeological deposits. In summary, the commenter expressed concerns with the use of such second-hand data that could pose a large degree of sampling uncertainty. The basic problem is using sub-surface coring samples taken for purposes other than archaeological research.	Comment Noted. The information used for the findings in the Phase I Archaeological survey subsurface investigations were based only on the shovel testing and mechanical trenching (deep testing) conducted directly by a 36 CFR Part 61 qualified archaeologist. See Response P27.
P29	Mark Raab, Watkins Foundation	Previous archaeological research demonstrates that highly significant archaeological resources are documented around and within the "footprint" area that makes up the project's direct APE. As we show below, SHPO guidance emphasizes testing for possible buried archaeological resources in terminal area because this was once the site of archaeologically significant 19th Century farms and related cultural features, including possible human graves.	The Phase I Archaeological survey, June 2018 was conducted on the Direct APE where there was a potential for physical disturbance from the Proposed Action. No archeological or cultural resources were discovered during the survey and ground testing. A Programmatic Agreement under Section 106 of the National Historic Preservation Act (Section 106) has been developed, which includes an unanticipated discovery plan to assist with any inadvertent archeological or cultural resource discoveries that may occur during routine subsurface disturbances of the Proposed Action. Refer to Appendix C for the PA.
P30	Mark Raab, Watkins Foundation	Table 2 of the Golder report misrepresents the Federal preservation status of sites PL1470, PL1504 and PL1507. These are listed as "unevaluated" in terms of eligibility for the National Register of Historic Places. These are not minor omissions but material biases against complete and informed assessment of the airport's archaeological resources. These omissions also obscure airport Federal accountability.	The Draft Environmental Assessment identified 23PL1470 and 23PL1504 as those that might meet NRHP eligibility and 23PL1507 was identified as meeting NRHP eligibility criteria. However, by letter dated November 20, 2009 the SHPO concurred that 23PL1470 and 23PL1504 are not eligible for inclusion in the NRHP. The Environmental Assessment, Section 3.10.1.2 and Table 3 of the Phase I Archaeological survey were revised to show 23PL1507 as meeting NRHP eligibility criteria and 23PL1470 and 23PL1504 as not being NRHP eligible. All of

Comment Number	Commenter	Comment Summary	Response
		Archaeological sites found potentially or demonstrably Register eligible trigger Federal protection under Section 106 of the NHPA.	these sites are outside of the Direct APE and would not be physically disturbed by the Proposed Action.
P31	Mark Raab, Watkins Foundation	References to the reports which originally documented these three sites (ERCM 2008 and 2009) are nowhere found in the Golder report. Readers unfamiliar with the history of airport archaeological investigation would have no clue these reports even exist.	Table 2 of the Golder report provided references to the previous investigations and studies conducted. The Final EA has been revised in Section 3.10.1.2 to discuss the previous studies conducted at the Airport including the Phase I Surveys conducted by the Environmental Research Center of Missouri for 23PL1470, 23PL1504, and 23PL1507.
P32	Mark Raab, Watkins Foundation	We believe that the EA should be prepared with this conflict of interest acknowledged. To act as a fair broker in the preparation of the EA, the airport must provide a full and explicit accounting of the historical, archaeological and legal precedents that are currently omitted from the Golder report and other relevant sections of the EA.	A 36 CFR Part 61 qualified archaeologist was selected to conduct the Phase I Archaeological survey. The FAA, as the lead Federal agency to ensure compliance with NEPA and Section 106 of the NHPA for this Proposed Action, reviewed the information. The Missouri SHPO reviewed the Phase I Archaeological survey and by letter dated August 14, 2018 stated that a thorough and adequate monitoring of the cultural resources has been conducted of the project area.
P33	Mark Raab, Watkins Foundation	We therefore request that the draft EA be amended to write African Americans into this history. The EA should not be accepted until this information is appropriately integrated into the Golder report and other relevant sections of the EA.	Comment noted. See response to P23.
P34	Mark Raab, Watkins Foundation	Missouri SHPO's letter endorsing the results of the Golder study is appended to the Golder report (page 379 of the EA). This suggests the letter may have been forthcoming before the Golder report was submitted to the airport.	The Missouri SHPO in the Missouri Department of Natural Resources is responsible, in partnership with the U.S. Department of the Interior's National Park Service and local governments, in carrying out the mandates of the National Historic Preservation Act (P.L. 89-665,as amended) in Missouri. The SHPO works with citizens and groups throughout the state

Comment Number	Commenter	Comment Summary	Response
			to identify, evaluate and protect Missouri's diverse range of historic, architectural and archaeological resources. The SHPO letter is included in the EA appendix as reference to the SHPO's concurrence with the Golder report. The SHPO's letter is not part of the Golder report. The last page of the Golder report clearly shows as the back page of the report.
P35	Mark Raab, Watkins Foundation	Two cultural resources reports (1987 Sturdevant report and 2008 Sturdevant report) submitted by KCI to your office and the FAA raise troubling questions about the airport's past and future compliance with Section 106. These reports document a disturbing history of undocumented destruction of federally protected historic resources spanning three decades, as well as risk to historic resources in the future. References to these reports and their findings appear nowhere in the EA's Section 106 report.	The Phase I Survey conducted by the Environmental Research Center of Missouri in 2008, which included the findings of the 1987 report, was referenced in Table 2 of the Phase I Archaeological survey and in the Draft Environmental Assessment. The Final EA has been revised to discuss the previous studies conducted at the Airport, please refer to EA Section 3.10.1.2. Please also refer to EA Section 3.10.13 and Response P82 with regard to TCP.
P36	Mark Raab, Watkins Foundation	The EA's Section 106 report is specifically tasked with reviewing previous airport archaeological studies and their significance (EA: 311-448). Amazingly, three previous airport archaeological studies are not referenced or discussed in the EA's current Section 106 report: ERCM 1987, 2008 and 2009	Please see Response P35
P37	Mark Raab, Watkins Foundation	We believe that a full and fair accounting of the airport's management of cultural, historical and archaeological resources is overdue. By law and right, the EA is the proper occasion of such an	The FAA is the lead Federal agency to ensure compliance with NEPA and Section 106 of NHPA for this Proposed Action; therefore, this EA has been prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and*

Comment Number	Commenter	Comment Summary	Response
		accounting. We believe that the EA should be accepted until it includes this accounting. We also suggest that oversight of this accounting should not be left to the airport, but rather by independent regulatory authorities such as the Advisory Council on Historic Preservation and the Federal Aviation Administration.	*Procedures*; and FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions*, and all other special purpose laws and regulations, such as the National Historic Preservation Act (NHPA). FAA is obligated under 36 CFR 800.4(b)(1) to make a "reasonable and good faith effort" to identify historic properties. For purposes of this Proposed Action under Section 106, this EA focuses on the Direct and Indirect APE to assess the impacts of this Proposed Action. The Advisory Council on Historic Preservation has been consulted on this Proposed Action and has declined to participate in consultation.
P38	Mark Raab, Watkins Foundation	The EA is specifically tasked with assessing past airport Section 106 efforts and assessing their significance to the current effort.	Please see EA Section 3.10.1.2 and Responses P51 and P70.
P39	Mark Raab, Watkins Foundation	The possibility that significant archaeological resources survive below ground has not been assessed, as far as we are aware. A third Section 106 study conducted by the airport, excavations reported in 2009 (ERCM 2009), shows that historic structures like those noted in 2008 (ERCM 2008) may be associated with exceptionally preserved and scientifically and cultural significant below ground archaeological deposits. Until such an assessment is carried out, significant archaeological resources may be at risk.	Please see Responses P29 and P38.
P40	Mark Raab, Watkins Foundation	The EA is a reasonable and appropriate context for concluding the airport's Section 106 obligations in the matter of these Register-eligible properties.	Please see Response P38 and P39.
P41	Mark Raab, Watkins Foundation	The EA's current Section 106 study should include a Memorandum of Agreement (MOA)	A Programmatic Agreement (see Appendix C) under Section 106 of the National Historic Preservation Act (Section 106) has been developed to provide mitigation for the adverse effect to

Comment Number	Commenter	Comment Summary	Response
		between the airport, Missouri SHPO and the FAA to do the following: ● Report, to the extent practical, the conditions under which the five historic archaeological properties were destroyed. ● Obtain SHPO recommendations for sub-surface archaeological testing of the five historic properties shown above and execute an MOA for carrying such testing. The commenter also includes an appendix alleging KCAD conflicts of interest in past and present compliance with federal historic preservation laws.	the potential historic district. The Agreement also includes an unanticipated discovery plan to assist with any inadvertent archeological or cultural resource discoveries that may occur during routine subsurface disturbances of the Proposed Action. Please see EA Section 3.10.1.2 for an accounting of the five structures being referenced. It is important to note none of the locations where these structures were previously found would be directly impacted or physically disturbed by the Proposed Action. If a future project is proposed on or near these sites, then any required Section 106 evaluation of the sites would be conducted at that time. Section 1506.5 of the CEQ regulations states “”If an agency permits an applicant to prepare an environmental assessment, the agency, besides fulfilling the requirements of paragraph (a) of this section, shall make its own evaluation of the environmental issues and take responsibility for the scope and content of the environmental assessment.” KCAD has prepared this EA. Consistent with these regulations, where KCAD has been required to submit environmental information for use by FAA, for this EA, FAA has independently evaluated the information submitted and is responsible for its accuracy. Further, FAA has made its own evaluation of the environmental issues in the EA and takes responsibility for the scope and content of this EA. Similarly, consistent with 36 CFR 800.2 in the Section 106 regulations, for this EA, FAA has ensured that documents or studies prepared by a non-federal party meet applicable standards and guidelines. The FAA is the lead Federal agency to ensure compliance with NEPA and other applicable federal requirements for this

Comment Number	Commenter	Comment Summary	Response
			Proposed Action; therefore, this EA has been prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*; and FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions.*
P42	Charles Cammack	Exhibit 2.3 shows two possible renovation plans for KCI. The upper half of the exhibit shows existing parking garages out of place and incorrectly sized. The plan is unfeasible as the processing building would extend into the existing parking garage. The plan shown in the lower half of that exhibit is also flawed in that the garages are not shown in the correct form (and possibly position). Parking garages A and B have posttensioned decks, so it is not possible to adjust the shape of the garages (personal report from the engineer of record). Since the single processor is located between Terminals A and B, huge physical changes result that are detrimental. Walking distances become too great, and moving walkways must be linear.	Alternative 2: Renovate the existing terminals with two new central processors and Alterative 3: Renovate the Existing Terminals with one new central processors were evaluated as part of this Environmental Assessment and Section 4(f) Statement. Both of these alternatives did not meet the stated purpose and need of the Proposed Action and therefore were not selected for detailed environmental analysis.
P43	Charles Cammack	A properly prepared EA would include consideration of the best renovation plan (ALT 30).	Over the years, KCAD initiated a variety of planning efforts to address the planning of terminal facilities such as development of an airport master plan and terminal improvement program. Many different alternatives were reviewed and evaluated. See Chapter 2 of the EA. Some of these alternatives were very similar to the ALT 30 proposal. The six alternatives evaluated under this EA are a result of these previous planning efforts. They included the No Action Alternative, replacing the three existing terminals with one new facility, and major renovations to the existing terminals. The alternatives were evaluated through a screening process to determine whether they meet the Purpose

Comment Number	Commenter	Comment Summary	Response
			and Need. The EA was prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures,* and FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions.*
P44	Charles Cammack	Breaking down intact, heavily reinforced, interconnected structural members will be much more difficult than breaking up lightly reinforced pavement slabs resting on the ground. Air quality concerns at KCI will include the aircraft engines.	Please see EA Section 3.5. An air quality assessment was conducted as part of the EA. The analysis concluded that none of the relevant federal thresholds were equaled or exceeded for the Proposed Action. In addition, emissions from construction activities would not equal or exceed the *de minimis* thresholds defining insignificant and negligible emissions. Therefore, no significant adverse construction impacts would occur relative to air quality. The demolition of the terminals and the construction of the Proposed Action would result in a short-term increase of airborne fugitive dust emissions from vehicle movement and soil excavation in and around the construction site. KCAD would ensure that all possible best management practices would be taken to reduce fugitive dust emissions by adhering to guidelines included in FAA Advisory Circular (AC), Standards for Specifying Construction of Airports. As part of the ALP approval along with design and construction approval, the airport sponsor must meet safety and security standards. Approval of a Construction Safety and Phasing Plan to maintain aviation and airfield safety during construction pursuant to FAA Advisory Circular (AC) 150/5370-2F, Operational Safety on Airports During Construction (14 CFR Part 139 [49 USC § 44706]) will be required to be submitted to the FAA prior to construction.

Comment Number	Commenter	Comment Summary	Response
P45	Charles Cammack	Edgemoor's plan and any alternative used in the EA should be confirmed to be feasible by a credible, unbiased source. Due to the traffic problem cited above, I don't consider Edgemoor's plan to be feasible - that is, they can't build it without putting the health and safety of drivers and passengers at risk.	The Proposed Action has gone through an exhaustive review process by KCAD. KCAD and the airlines initiated the Exhibit K Agreement that defined a process to more fully explore various alternatives. The Exhibit K process included a detailed alternatives analysis and was a unique collaborative process involving a working partnership between the airlines serving KCI and KCAD. Please refer to Section 3.14.1 of the EA for a discussion of traffic impacts.
P46	Charles Cammack	Please direct KCMO and Edgemoor to revise their EA for the single terminal by: ● Obtaining critical reviews of the plans, including my ALT 30 plan, from a credible, unbiased source ● Base the EA, in part, on the best renovation plan, ALT 30	Based on KCAD's specific goals, airline recommendations, FAA operational requirements, and criteria including affordability, airside, terminal, and landside characteristics, ability to meet security needs, support facilities, availability of utilities, environmental impacts, implementation, and other strategic considerations, KCAD has selected the Proposed Action as the preferred alternative. The EA was prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures,* and FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions.* The FAA has determined that the number of alternatives assessed in the EA is reasonable given the nature of the proposed action and agency experience with the environmental issues involved. Please see Chapter 2 of the EA and Response P43. See also FAA Order 1050.1F, Para. 6.2-1.
P47	Mark Raab, Watkins Foundation	The subsequent Section 106 evaluation of these properties by ERCM (1987) was carried out and, as we noted in our comments (attached), five of these structures were found Register eligible. It's after this finding that a mysterious "gap" appears in the compliance record. After being found Register eligible in 1987, and despite the guidance provided by the project final EIS, there	Please see EA Section 3.10.1.2 for an accounting of the five structures being referenced.

Comment Number	Commenter	Comment Summary	Response
		is no record of what happened to these structures until 2008, when ERCM (2008) notes that the structures have been razed with no Section 106 compliance record.	
P48	Mark Raab, Watkins Foundation	As we noted in our earlier comments, airport historic sites of this type have been found to contain Register eligible archaeological deposits. This is clearly documented in ERCM 2009. While the above-ground structures have been destroyed, we do not yet know if these sites contain significant archaeological deposits.	Please see EA Section 3.10.1.2 for an accounting of the structures being referenced. None of the locations where these structures were previously found would be directly impacted or physically disturbed by the Proposed Action. If a future project is proposed on or near these sites, then any required additional Section 106 evaluation of the sites would be conducted at that time.
P49	Mark Raab, Watkins Foundation	The Missouri SHPO clearly stated its intention that the airport give the SHPO an opportunity to comment on treatment of these properties. Is there any record of such consultation during the mysterious compliance “gap” noted above? As far as we are aware, no records have been produced by the airport or SHPO for this time period. Moreover, it remains an open question whether potentially significant archaeological deposits exist at these sites. This possibility has yet to be adequately documented. To repeat, we believe that Section 106 compliance in this case has not been satisfactorily concluded, and this deficiency should be addressed in the pending EA.	Please see Response P48.
P50	Mark Raab, Watkins Foundation	The lost sites are in the pending EA's APE and the Section 106 study is specifically tasked with assessing past Section 106 studies in the APE. As noted earlier, the draft Section 106 study makes no reference to major previous Section 106 studies at the airport. One of the omitted	Please see Response P48.

Comment Number	Commenter	Comment Summary	Response
		reports (ERCM 2009) excavated historic properties like those lost and found Register eligible, exceptionally preserved subsurface structural remains and archaeological deposits. This record does not give us much confidence the airport is making a good faith effort to assess affects of the proposed action. Archaeological deposits have a substantial probability of surviving at the five sites where above ground architecture went missing. Unless we get these five sites evaluated, the airport will likely be free to develop those properties in the future with no record of the existence of potentially significant archaeological resources. This includes expansion of facilities related to the replacement terminal.	
P51	Mark Raab, Watkins Foundation	The circumstances surrounding demolition of stone chimneys on the Miller farm archaeological site, 23PL1507, remain murky, despite our requests for information about alterations to the integrity of this National Register-eligible historical and archaeological site.	In 2008, KCAD proposed the removal of a stone chimney, a portion of a wall, and to fill a well and cistern at Site 23PL1507, because the area was visited by collectors and these features were considered a safety issue. Since the site had been considered eligible for listing on the NRHP and an adverse effect would occur a NEPA and Section 106 process was initiated. Public comments were solicited by KCI through The Kansas City Star on July 13 and 16, 2008. A memorandum of agreement (MOA) between KCI, SHPO, and the FAA was developed and approved in late 2008. On January 9, 2009, the Advisory Council on Historic Preservation acknowledged the filing of the MOA. Both the FAA and SHPO approved the archaeological data recovery project at Site 23PL1507 and an extensive cultural resource investigation of the site was conducted in 2009. The SHPO concurred,

Comment Number	Commenter	Comment Summary	Response
			November 20, 2009, that the stipulations in the MOA regarding the archaeological mitigation of Site 23PL1507 were satisfactorily completed. Several flats of the bricks from the chimney were donated to the Shoal Creek Living History Museum and are used on other donated structures as decorative foundation pieces.
P52	Mark Raab, Watkins Foundation	This excavation found the Miller farm site eligible for listing in the National Register of Historic Places, bringing it under Federal protection. Inexplicably, no reference to this study (ERCM 2009) is included in the pending Section 106 report.	EA Section 3.10.1 discloses that Site 23PL1507 is within the Indirect APE but would not experience any direct or indirect impacts due to the Proposed Action. The EA and Golder Report have been revised to state the current status of Site 23PL1507.
P53	Mark Raab, Watkins Foundation	Where did they (Miller house cut-stone chimneys) go? We asked the airport that question. The answer we received is that the airport considered the chimneys a safety hazard. They were torn down at some point after 2009 and the stones given to an off-airport party. We asked if the airport talked to anyone about whether demolition of the chimneys was an acceptable alteration to the integrity of a Register-eligible property.	Please see Response P51.
P54	Mark Raab, Watkins Foundation	Did the airport consult with Missouri SHPO about its plan to demolish the chimneys? We don't know, but we believe this information should be available to the public.	Please see Response P51.
P55	Mark Raab, Watkins Foundation	A narrow reading of the EA's purpose might suggest that terminal construction will have no direct effect on the Miller farm and other	The scale of the Proposed Action and the extent of FAA involvement define the scope of the Section 106 review, including FAA's obligation to identify historic properties, assess

Comment Number	Commenter	Comment Summary	Response
		archaeological properties and therefore need not consider descendant consultation. We believe such a view is shortsighted because it will continue to ignore obvious and meaningful community ties to the airport's archaeological and historical resources.	effects, and develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties. In this case, the Proposed Action is a proposed replacement terminal that would not expand the airport capacity. FAA is obligated under 36 CFR 800.4(b)(1) to make a "reasonable and good faith effort" to identify historic properties. Because the nature of this action involves replacement of an existing terminal with a proposed terminal of approximately the same footprint, primary impacts of this Proposed Action are related to that direct impact. The Environmental Assessment and Section 106 Evaluation has been conducted to determine the potential impacts of the Proposed Action. The FAA determined that there would be an "adverse effect" to the potential historic district located within the Direct APE. Based on the results of the Phase I Archaeological survey conducted as part of this process, development within the Direct APE will have no effect on known archeological or cultural resources. The FAA also determined that there would be "no adverse effect" on any historical, architectural, archaeological, or cultural resources in the Indirect APE.
P56	Mark Raab, Watkins Foundation	Attached is a PowerPoint program that shows some of the historic sites at the airport, including the illegally destroyed houses we mention in some of our comments to the airport. Are any Offutt ancestors connected in some way to the destroyed properties shown in the PowerPoint?	Email is directed to a Thomas Levin and does not contain a comment for this EA process. Please see Response P47 and EA Section 3.10.1.2for an accounting of the five structures being referenced.
P57	Charles Cammack	Mr. Bruce R. Watkins, Jr., a descendant of slaves, has requested that the Environmental Assessment (EA) for the single terminal airport	Please refer to Response P27.

Comment Number	Commenter	Comment Summary	Response
		(STA) be amended to recognize the presence of graves holding the remains of slaves at the airport site. Investigation by boreholes yield only scant information on the presence or absence of graves. One might be able to identify the soil as native (undisturbed) or fill (but probably not a grave fill). I hold that investigation by boreholes provides no value in this case.	The Phase I Archaeological survey, June 2018, was conducted on the Direct APE where there was a potential for physical disturbance from the Proposed Action. No archeological or cultural resources were discovered during the survey and ground testing. A Programmatic Agreement under Section 106 of the National Historic Preservation Act (Section 106) has been developed, which includes an unanticipated discovery plan to assist with any inadvertent archeological or cultural resource discoveries that may occur during routine subsurface disturbances of the Proposed Action. The final Programmatic Agreement is included in Appendix C of the EA. See also Response P46.
P58	Charles Cammack	I recommend that the EA investigation be extended by including an analysis of historic aerial photographs. The commentor also notes safety and traffic concerns.	Historic aerials were reviewed as part of this process. See Section 5.1 of the Golder Report in Appendix C. Please also see Responses P43 and P44
P59	Jon Woodward	It's about damn time we got to this point. Having done EAs & EISs for 30 years, the MCI terminal plan and its environmental effects have been shown numerous times to have zero significant (and virtually no insignificant) impacts on the environment - evaluations that have been accomplished several times during the last ten years. The terminal plan will provide benefits through significant improvements, the efficacy of traffic, security, and commercial enterprise within the terminal plan. While the three horseshoe plan has been a trademark of KCI for fifty years, subsequent changes in security have rendered	Comment Noted

Comment Number	Commenter	Comment Summary	Response
		everything from bathrooms to newsstands to be inefficient in the current layout. I hereby endorse the new plan.	
P60	Alicia Stephens	I would assume no issues since it is built on an existing site. Glad to see new detention area for deicing. Appreciate the public input opportunity but am eager to see KCAD move forward with the projects…prince of materials is not decreasing.	Comment Noted
P61	Warren Watkins Jr.	Previous studies document KCI archaeological sites of extraordinary importance to African American and U.S. history. African Americans have declared the importance of these sites to local history and culture, including connections to figures like Bruce R. Watkins. The airport's pending environmental study claims there are no minority groups with an interest in the airport's archaeological sites. This study also completely omits reference to the most important archaeological discoveries on airport land. The black community is effectively written out of history.	It is noted that minority groups have expressed an interest in the Airport's archeological sites. Please see Response P17. This EA has been prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*; and FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions*. According to the U.S. Census's American Community Survey (ACS) data, there were no existing environmental justice populations identified within the General Study Area.
P62	Warren Watkins Jr.	Archaeological sites found by these studies were destroyed in a manner that broke Federal law. Other airport historical properties have been studied in detail by archaeologists. The report of these investigations is mysteriously missing from the airport's environmental assessment.	Please see Response P47 and EA Section 3.10.1.2 for an accounting of the five structures being referenced.
P63	Mark Raab, Watkins Foundation	Do the airport's actions constitute anticipatory demolition, as defined by Section 110(k) of the NHPA? Anticipatory demolition is a serious	FAA is not aware of any intentional noncompliance with Section 106 with respect to these properties. Please see Response P47 and EA Section 3.10.1.2 for an accounting of the five structures being referenced.

Comment Number	Commenter	Comment Summary	Response
		offense in which a party intentionally avoids compliance with Section 106 of the NHPA	
P64	Mark Raab, Watkins Foundation	The pending EA's section 106 report should document what happened to the five historic properties shown in Appendix 1 (of the comment).	Please see Response P47 and EA Section 3.10.1.2 for an accounting of the five structures being referenced.
P65	Mark Raab, Watkins Foundation	The scope of the proposed action may have adverse effects on the five historic sites discussed above and shown in Appendix 1. The draft EA contends something quite different, concluding that the effects of the proposed action do not extend beyond the new terminal itself, an effected area of approximately 100 acres. This conclusion is unrealistic, based on the project's scope of anticipated construction activities and the project's Area of Potential Effects (APE).	None of the locations where these structures were previously found would be directly impacted or physically disturbed by the Proposed Action. The Direct APE covers approximately 700 acres and is defined as the area where direct impacts may result from the Proposed Action. Please see Response P47 and EA Section 3.10.1.2 for an accounting of the five structures being referenced.
P66	Mark Raab, Watkins Foundation	It's not clear that locations of such outlying construction areas have yet been determined or that such areas were given meaningful consideration in the current Section 106 study. Consequently, how can we reasonably assess whether the locations of historic sites listed in Appendix 1, and possible sub-surface archaeological deposits associated with them, will be affected by outlying construction activities?	The Direct APE includes areas of construction, borrow/fill sites, staging and stockpile areas, utility corridors, and haul routes. Potential impacts to historic properties in the Direct APE are addressed in Section 3.10 of the EA
P67	Mark Raab, Watkins Foundation	Seek guidance from the Advisory Council on Historic Preservation in resolving the issues outlined above. We suggest that the Council's role in determining anticipatory demolition would be helpful in evaluating this case. If the airport is determined to have engaged in a pattern of anticipatory demolition, we suggest that the	Please see Response P63.

Comment Number	Commenter	Comment Summary	Response
		Council and FAA should then concur in recommending that Federal grants and assistance to the airport be withheld until an MOA has been executed which provides for corrective action.	
P68	Mark Raab, Watkins Foundation	Appropriate corrective action should include discussion of the “disappeared” archaeological sites in the current Section 106 study.	Please see Response P47 and EA Section 3.10.1.2 for an accounting of the five structures being referenced.
P69	Anne Raab	I have had the opportunity to read the comments submitted on behalf of the Watkins Foundation, and I whole-heartedly support those comments and their recommendations.	Comment Noted
P70	Anne Raab	This report inexplicably omits major airport archaeological studies that document historic archaeological sites eligible for the National Register of Historic Places. These reports should be referenced and analyzed. These previous archaeological studies are important to the proposed construction.	Previous cultural resource investigation reports were reviewed and referenced in this EA. The Draft Environmental Assessment identified 23PL1470 and 23PL1504 as those that might meet NRHP eligibility and 23PL1507 was identified as meeting NRHP eligibility criteria. No other sites identified from previous reports were determined eligible for inclusion in the National Register. SHPO in a letter dated June 2, 2008 stated that a thorough and adequate cultural resource survey was conducted for this study which included approximately 8,000 acres of land. By letter dated November 20, 2009 the SHPO concurred that 23PL1470 and 23PL1504 are not eligible for inclusion in the NRHP. The Environmental Assessment and Table 2 of the Phase I Archaeological survey was revised to show 23PL1507 as meeting NRHP eligibility criteria and 23PL1470 and 23PL1504 as not being NRHP eligible. All of these sites are outside of the Direct APE and would not be physically disturbed by the Proposed Action.

Comment Number	Commenter	Comment Summary	Response
			Please see EA Section 3.10.1.2 for additional information.
P71	Anne Raab	These sites present a rare opportunity to collect information about these important sites. This circumstance is presumably why the Missouri SHPO requested “deep testing” of the new terminal construction area.	The Phase I Archaeological survey was conducted on the Direct APE where there was a potential for physical disturbance from the Proposed Action. No archeological or cultural resources were discovered during the survey and ground testing. A Programmatic Agreement (see Appendix C) under Section 106 of the National Historic Preservation Act (Section 106) has been developed, which includes an unanticipated discovery plan to assist with any inadvertent archeological or cultural resource discoveries that may occur during routine subsurface disturbances of the Proposed Action. Please see EA Section 3.10.1.2 for additional information.
P72	Anne Raab	The EA should identify these descendants and seek their comments on how the airport will manage its cultural resources. Their status as descendant communities, in my professional opinion, seems clear.	Several public involvement activities were completed allowing stakeholders and the public to participate in the process and provide comments. See EA Chapter 4.
P73	Anne Raab	The airport has a conflict of interest.	Please see Response P41.
P74	Anne Raab	This claim is contradicted by the fact that thousands of acres have already been developed on airport property far beyond the existing terminals, and much more development is planned, particularly as stimulated by increased aviation activities. The EA should include past, present and future development in enough detail to assess future environmental risk.	EA Section 3.18 included an analysis of potential cumulative effects. The analysis encompassed the geographic boundaries beyond the immediate area of the Proposed Action, and a reasonable timeframe based on the nature and extent of the potential effects, including past actions and foreseeable future actions, in order to capture these additional effects. The level of cumulative impacts anticipated to occur within the environmental resource categories is not significant due to the types of past, present, and reasonably foreseeable future projects, the extent of the built environment in which they would occur, the lack of certain environmental resources in the area, and the mitigation measures identified for the Proposed Action.

Comment Number	Commenter	Comment Summary	Response
P75	Anne Raab	I also believe the SHPO should rescind its approval of the EA until these issues are properly addressed.	Comment Noted
P76	Shirley Kimsey	The Airport allowed the Kimsey cemetery to be bulldozed, trees were put on the stones and set on fire. So, it literally deshadowed the old tombstones. I do have the records to prove this, and it bothers me. I just don't think that the Airport has done as well as they should on preserving some of this. I was told any number of times that under one of the ruins, there is still actually several plots, and they were probably slaves. I have also heard that when they were doing all of the bulldozing, there were things found, and all that, and they did not preserve those bones, and they just junked them.	Comment Noted. In June 2018, an archeological and cultural resource survey (Golder Report in Appendix C) was conducted of the Direct APE in compliance with Section 106 of the NHPA. The survey included an archaeological background records review and an intensive pedestrian survey with shovel testing and mechanical trenching by a 36 CFR Part 61 qualified archaeologist. No archeological or cultural resources were discovered during the survey and ground testing. Please see EA Section 3.10 and Response P63.
P77	Olin Miller	I came tonight to make sure that the construction folks knew about the Hughes Family Cemetery and the Hughes Slave Cemetery, which are located due south of Terminal B. We don't know exactly how far up in between the Terminal and the far side of the runway. The cemeteries were dozed in when the runways were originally built in the last fifties, and we are talking about probably 20 white graves and close to 100 Negro or slave graves. No efforts were made to remove the bones or the bodies. We don't know what direction the earth movers took the dirt, so anywhere under those Terminals there may be bones. We don't know where they are. There is	No archeological or cultural resources were discovered during the June 2018 (Golder Report in Appendix C) survey and ground testing conducted for this Proposed Action. A Programmatic Agreement (Appendix C) under Section 106 of the National Historic Preservation Act (Section 106) has been developed, which includes an unanticipated discovery plan to assist with any inadvertent archeological or cultural resource discoveries that may occur during routine subsurface disturbances of the Proposed Action.

Comment Number	Commenter	Comment Summary	Response
		no written record done back in the late fifties, and there was no effort made at that time to protect anything.	
P78	Cora Douglas Thompson	It is significant to me that in order to try to sanitize the history of this land, the Airport again is trying to pretend that slaves didn't exist in this area.	Previous cultural resource investigations conducted at the Airport have identified sites that have been considered eligible for listing on the National Register of Historic Places. Archaeological data recovery has even occurred at Site 23PL1507. However, no archeological or cultural resources were discovered within the Direct APE where this Proposed Action would occur. Please see Response P57.
P79	Cora Douglas Thompson	If there were any slave graves over there, then they were under the Terminal that exists there now, and the archeologist doesn't know of any slave graves.	In June 2018, an archeological and cultural resource survey (Golder Report in Appendix C) was conducted of the Direct APE in compliance with Section 106 of the NHPA. The survey included an archaeological background records review and an intensive pedestrian survey with shovel testing and mechanical trenching by a 36 CFR Part 61 qualified archaeologist. No archeological or cultural resources were discovered during the survey and ground testing. See also response to P29.
P80	Frank Offutt	The Hampton Cemetery Association is concerned about the efforts for improvements and what impact from that will be. And it was impacted in 1965 when bodies were removed from Terminal B to a new Hampton Cemetery and Cemetery Annex.	No archeological or cultural resources were discovered during the survey, June 2018 (Golder Report in Appendix C), and ground testing conducted for this Proposed Action. A Programmatic Agreement under Section 106 of the National Historic Preservation Act (Section 106) has been developed, which includes an unanticipated discovery plan to assist with any inadvertent archeological or cultural resource discoveries that may occur during routine subsurface disturbances of the Proposed Action. No impacts to the Hampton Cemetery are anticipated from this Proposed Action.
P81	Warren Watkins Jr.	Why is the Environmental Study writing that there are no minority groups with the interest in the Airport or the archeology sites?	Please see Response P61. Please refer to EA Section 3.14.2. The U.S. Census's American Community Survey (ACS) data was used to determine which census block groups are

Comment Number	Commenter	Comment Summary	Response
			composed of 50% or more minority populations and/or 50% or more low-income populations. According to the data there were no existing environmental justice populations identified within the General Study Area. In addition, the Proposed Action would not have a disproportionately high and adverse effect on minority populations and low-income populations. Implementation of the Proposed Action would not cause those populations to suffer more than, more severely, or greater in magnitude than that which would be suffered by the non-minority and non-low income populations.
P82	Mark Raab, Watkins Foundation	We described the airport as a TCP of great importance to descendants of enslaved African Americans and to Euro-American descendants of slave owners. These descendants, which today form a community united in their efforts to preserve cultural history, have direct, demonstrable links to 19th Century farms located where the airport's terminals currently stand, including the Proposed Action's direct Area of Potential Effects (APE).	Please refer to EA Section 3.10.1.3. The historic significance of this area is not in dispute, nor is its current importance to the descendants of the 19th century inhabitants of this area. Assuming the existence of a historic district that encompassed some or all of the airport property, the terminal complex, airfield and ancillary structures do not retain integrity as a 19th century rural landscape and would either be excluded from its boundaries or considered non-contributing resources. Therefore, there would be no effects to this potential district within the Direct APE. The noise and visual impacts of the undertaking would not differ in character from what currently exists, and therefore there would be no effects to this potential district in the Indirect APE. Based on this analysis, there is no need to evaluate the eligibility of such a district as a TCP at this time.
P83	Mark Raab, Watkins Foundation	Appropriate TCP evaluation of the Proposed Action's effects should have included consultation with declared TCP stakeholders.	Several public involvement activities were completed allowing stakeholders and the public to participate in the process and provide comments. See EA Chapter 4.

Comment Number	Commenter	Comment Summary	Response
P84	Mark Raab, Watkins Foundation	The draft EA should be amended to include discussion of the two main criteria that identify a TCP: National Register eligibility of airport property as a distinct historical and cultural district and consulting with members of a traditional community. Abundant data are available with which to evaluate both criteria and these should be identified and evaluated in the EA.	Please see Response P82.
P85	Mark Raab, Watkins Foundation	Diverse data sets make a strong case for KCIA as a TCP, as defined above. These include information establishing the airport as a potentially Register-eligible historical and cultural district. These data also include members of a traditional community, partly African American and partly Euro-American, who are working together to preserve airport cultural history.	Please see Response P82.
P86	Mark Raab, Watkins Foundation	This statement implies that the Proposed Action, owing to its limited “footprint”, will have no adverse effects on historic properties beyond the terminal itself. This statement is an evasion. It evades African American descendants’ prior written request that the EA consider the airport in toto as a TCP, employing criteria established by Federal authorities for that purpose.	The undertaking would include ground disturbance and construction activities within the existing terminal complex. The Direct APE was defined as the area of potential physical disturbance. The Direct APE includes areas of construction, borrow/fill sites, staging and stockpile areas, utility corridors, and haul routes. Please see Response P82.
P87	Mark Raab, Watkins Foundation	At the center of this map are the existing airport terminals, including the “footprint” of the Proposed Action. Pains-taking archival researcher by Dr. Dawn Stricklin, Columbia College, undertaken at the request of the Watkins Foundation, reveals that at least 30 slave-owning farms existed on airport property. Mathew Hughes owned over 30	Please see Response P82. The existing land uses within the Direct APE are made up of developed land currently used for Airport operations. The Phase I Archaeological survey (Golder Survey in Appendix C) was conducted on the Direct APE where there was a potential for physical disturbance from the Proposed Action. No archeological or cultural resources were discovered during the survey and ground testing.

Comment Number	Commenter	Comment Summary	Response
		slaves, ancestors of the descendants discussed in Appendix 1. The proposed construction footprint is located on the site of the Hughes farm. Moreover, a 2009 report of archaeological excavations at the airport documents in detail the farms of Hughes neighbors and relatives, all slave-owning (ERCM 2009). The direct APE of the new terminal is literally ground-zero of a cultural and historical landscape of slavery and its socio-political effects on American society; a landscape that we believe makes a compelling case for designation as a TCP. None of these facts are considered in the EA but we believe they should be, particularly because African American descendants made a reasoned and reasonable request to the airport for such consideration	
P88	Mark Raab, Watkins Foundation	We believe that wide range of cultural and historical data, including previous airport archaeological investigations (ERCM 2009), warrant a good-faith evaluation of the airport's status as a TCP. This evaluation should include (1) consultation with declared TCP stakeholders and (2) consideration of National Register eligibility of airport property as a distinct historical and cultural district.	The scale of the Proposed Action and the extent of FAA involvement define the scope of the Section 106 review, including FAA's obligation to identify historic properties, assess effects, and develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties. In this case, the Proposed Action is a proposed replacement terminal that would not expand the airport capacity. FAA is obligated under 36 CFR 800.4(b)(1) to make a "reasonable and good faith effort" to identify historic properties. Because the nature of this action involves replacement of an existing terminal with a proposed terminal of approximately the same footprint, primary impacts of this Proposed Action are related to that direct impact.

Comment Number	Commenter	Comment Summary	Response
			Please see Response P82.
P89	Mark Raab, Watkins Foundation	Federal Aviation Administration's (FAA) land-use regulations require KCIA to prepare a historic preservation plan (HPP). The draft EA references no such plan in its discussion of the airport's archaeological and historical resources.	This comment references guidance developed by the FAA Southern Region Airport Division in 1998, "Land Use Compatibility and Airports" in reference to noise impacts and compatible land use around airports and is taken out of context. This guidance specifically states, "This guide, developed by the Task Force, is provided as a resource to local planners, governments, and other interested parties **and should not be construed as FAA regulations or official agency policy** [emphasis added]. The case studies contained within this guide are included as examples to illustrate specific techniques and strategies of how and where some of the compatible land use tools across the country have been applied and implemented. Inclusion of these examples does not in any way represent official endorsement by the FAA. In some instances, approved Part 150 Noise Compatibility Program measures and Noise Exposure Maps have been included as examples for discussion purposes only." The Kansas City International Airport is not required to develop cultural resource management plans (CRMP) under Section 110 of the NHPA. While a CRMP is an excellent management tool, KCI is not a Federal facility and the FAA cannot require the airport sponsor to develop such a plan.
P90	Mark Raab, Watkins Foundation	We are requesting that the FAA, Advisory Council for Historic Preservation (ACHP) and the Missouri State Historic Preservation Office (SHPO) to condition acceptance of the draft EA on preparation of an MOA in which KCIA agrees to prepare an airport HPP.	Please see Response P89.

Comment Number	Commenter	Comment Summary	Response
P91	Mark Raab, Watkins Foundation	We documented long-standing problems with protection of archaeological and historic resources at KCIA, including undocumented destruction of properties found eligible for listing on the National Register of Historic Places. We also documented deficiencies in the draft EA's Section 106 report, including failure to reference major archaeological studies performed at KCIA in the past	Please see Response P47 and EA Section 3.10.1.2 for an accounting of the five structures being referenced.
P92	Mark Raab, Watkins Foundation	The lack of such a data base is apparent in the draft EA's Section 106 report, which fails to reference important archaeological studies conducted at the airport in the past; studies which have an important bearing on the current Section 106 investigation. These earlier reports, for example, discuss important archaeological discoveries in the construction area the Proposed Action. There is also the future to consider. The airport plans to develop much of its 53 square miles of land. These development objectives should include an airport HPP.	Previous cultural resource investigation reports were reviewed and referenced in this EA. No earlier reports discuss archeological resources in the construction area of the proposed action. In June 2018, an archeological and cultural resource survey (Golder Survey in Appendix C) was conducted of the Direct APE in compliance with Section 106 of the NHPA. The survey included an archaeological background records review and an intensive pedestrian survey with shovel testing and mechanical trenching by a 36 CFR Part 61 qualified archaeologist. No archeological or cultural resources were discovered during the survey and ground testing. The SHPO concurred with the results of this survey, August 14, 2018. See Responses to P13, P47, P70, and P89. Please see EA Section 3.10.1.2 for an accounting of the five structures being referenced.
P93	Anne Raab	This EA is being done because Kansas City International Airport is requesting permission to build a new airport.	To clarify, the proposed action does not include building a "new airport", only a replacement passenger terminal building within approximately the same footprint as the existing Terminal A building. Please see Chapter 1 of the EA. The Proposed Action includes the demolition of Terminal A and construction of a replacement terminal on Airport property located on the existing Terminal A site. The Proposed Action

Comment Number	Commenter	Comment Summary	Response
			also includes construction of a new parking structure and demolition of the existing Terminals B and C after the new terminal is in operation. The City of Kansas City, Missouri, Aviation Department (KCAD), prepared this EA to disclose the analysis and findings of the potential environmental impacts of the Proposed Action and the No Action Alternative. The FAA is the lead Federal agency to ensure compliance with NEPA and other applicable federal requirements for this Proposed Action.
P94	Anne Raab	It's not clear what kind of environmental impacts have resulted from these developments or whether the airport has complied with regulations in developing this land. For instance, have all previous construction/development projects gone forward with proper approval of the Airport Layout Plan (ALP)?	KCAD is required to operate KCI in compliance with all applicable Federal regulations, which includes the development of an airport layout plan.
P95	Thomas Levin	I am concerned that reports such as these are not included in the environmental report, much less even mentioned. At best this would appear to be an oversight. At worst, it would seem to be an intentional omission intended to ignore the significant and well documented archaeology and history of the area, including the airport.	It is not possible to include all reports as part of this EA. All reports and records are on file with KCAD, SHPO, and the FAA. Previous cultural resource investigation reports were reviewed and referenced in this EA. Please see Response P47 and EA Section 3.10.1.2 for an accounting of the five structures being referenced..
P96	Thomas Levin	I believe the Aviation Department and the Developer should consult with the descendants regarding their wishes for the treatment of archaeology and history of the airport land.	Several public involvement activities were completed allowing stakeholders and the public to participate in the process and provide comments. See EA Chapter 4.
P97	Warren Watkins Jr.	The group was not allowed by the airport to make a presentation at the workshop but we were able to show a Power Point and to answer the	A public workshop and hearing was conducted on September 24, 2018 to offer the public the opportunity to provide comments on the information contained in the Draft EA. The public was able to review display boards illustrating the Proposed Action

Comment Number	Commenter	Comment Summary	Response
		questions of interested parties outside the meeting.	and the potential environmental impacts. The public workshop and hearing was conducted in an open house format, with FAA, KCAD, and the consultant team available to provide information and answer questions. For those wanting to make an oral statement a court reporter was available. Each commenter was allowed three minutes in an effort to respect the rights of all commenters.
P98	Lisa Piazza	I too request that important documents that have been left out of the Environmental Assessment be included in the report, such as the Miller Plantation: An Archeological Interpretation of a Northwest Missouri Antebellum Slave Site-1998, Jimmy S. Johnson, III, and the Cultural Resource Investigations 23PL1470. 23PL1504 & 23PL1507. Please take the cultural and natural history of the airport land seriously and create something that gives it the regard it deserves and leaves a legacy to be learned and shared. Don't hide history or destroy it.	It is not possible to include all reports as part of this EA. All reports and records are on file with KCAD, SHPO, and the FAA. Previous cultural resource investigation reports were reviewed and referenced in this EA. In addition, a Phase I Archaeological survey, June 2018, was conducted on the Direct APE where there was a potential for physical disturbance from the Proposed Action. No archeological or cultural resources were discovered during the survey and ground testing. Please see Response P47 and EA Section 3.10.1.2 for an accounting of the five structures being referenced.