



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

November 16, 2022

Surface Transportation Board
Attention: Diana Wood
RE: Environmental Filing, Docket No. FD 36500 (Sub-No. 1)
395 E. Street SW
Washington, DC 20423-0001

Dear Diana Wood,

This letter is in response to the Office of Environmental Analysis Director Danielle Gosselin's environmental effects request letter, dated October 20, 2022, sent to Scott Edwards, State Conservationist, NRCS, Missouri. The following comments pertain to the proposed acquisition of a line of railroad between Kansas City, MO, and Springfield and East St. Louis, IL. 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 is available at the Farmland Protection Policy Act web site- <https://www.nrcs.usda.gov/conservation-basics/natural-resource-concerns/land/cropland/farmland-protection-policy-act>.

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, then 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 any 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.** Cropland, forest, grassland, are included in the definition of agricultural land. If final construction does not eliminate any land from



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agricultural crop production, then FPPA does not apply. Construction for national defense purposes are exempt from the FPPA- Farmland Protection Policy Act.

4. The NRCS County Hydric soil lists can be obtained at the county NRCS field office, and online at the NRCS 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. 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.

If you have any questions, please call me at 816-364-3927 ext. 6.

Sincerely,

A handwritten signature in cursive script that reads "Kim Vinson".

Kim Vinson
Area Resource Soil Scientist, acting

cc: Andrea King, Area Conservationist, Palmyra, MO
Diane Bradley-Redden, Area Conservationist, St. Joseph, MO
Jorge L. Lugo-Camacho, State Soil Scientist, Columbia, MO