

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

ENTERED
Office of Proceedings
January 28, 2019
Part of
Public Record

FINANCE DOCKET NO. 35982

**JACKSON COUNTY, MISSOURI
-ACQUISITION AND OPERATION EXEMPTION-
UNION PACIFIC RAILROAD COMPANY
VERIFIED NOTICE OF EXEMPTION
PURSUANT TO 48 C.F.R. § 1150.31, *Et. Seq.***

NOTICE OF SUPPLEMENTAL INFORMATION

***DEBORAH S. GROH
DJJHS ENTERPRISES, LLC
JHB & MEB ENTERPRISES, LLC
DAVID W. WELLS
DAWN R. WELLS
CURRENT PROPERTIES INVESTMENTS, LLC
NEPHRITE FUND 1, LLC***

Stewart, Wald & McCulley, LLC
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Counsel for Plaintiffs

Dated: January 10, 2019

Please find additional information in support of *Groh, et al.*'s Petition for Revocation which was filed on October 23, 2018. Jackson County filed its reply to CenturyLink Communication LLC's Motion for Housekeeping Stay on January 19, 2016. Jackson County stated on page 9 of its reply that "***Jackson County has no plans to remove track from the trail and Petitioners statement regarding track removal is unfair and unsubstantiated***". This is a false statement. The rails and ties have indeed been removed from the corridor as demonstrated by Plaintiffs' Notice of Supplemental Authority affidavits and photographs filed on January 4, 2019. The photographs clearly show the tracks and ties have been removed from the trail. Landowners also confirm that the rails and ties have been removed. This contradicts statements listed in Jackson County's January 19, 2016 reply to CenturyLink Communications before the STB.

Also, Jackson County filed its reply in opposition for petition of revocation on November 13, 2018. In their reply, respondents state petitioners have not submitted any relevant evidence to demonstrate that the Notice is false or misleading or contrary to rail transportation policy. The December 13, 2018 photographs indeed show Jackson County submitted false statements to the STB when it in fact has removed the tracks and ties. If a notice of exemption contains false or misleading information, it is void ab initio. That is the case here

Petitioners have also received a copy of a 25-page PowerPoint depicting the future plans of the Rock Island Corridor. The PowerPoint is dated October 25, 2018. The PowerPoint provides a detailed analysis of the intended use of the corridor as a "shared use path." The Rock Island PowerPoint and its intended future use of the corridor is clear and convincing evidence that Jackson County provided false and misleading statements to the STB in the December 23, 2015 Notice of Exemption and the Exemption should immediately be revoked.

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COUNSEL FOR PETITIONERS/LANDOWNERS

CERTIFICATE OF SERVICE

I certify that I have this day served copies of document upon all parties of record in this proceeding, by U.S. Mail this 10th day of January, 2019.

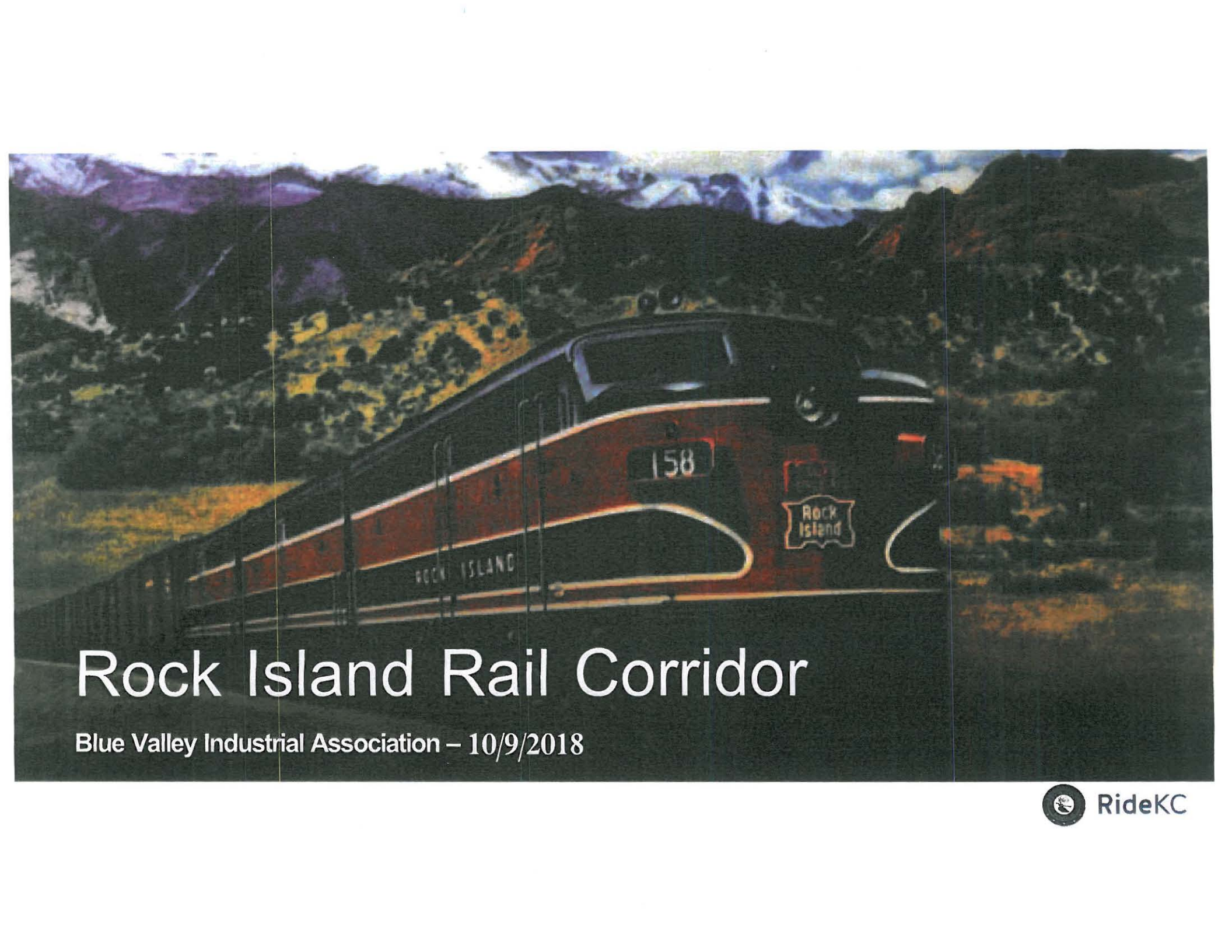
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/s/ Elizabeth A. McCulley_____

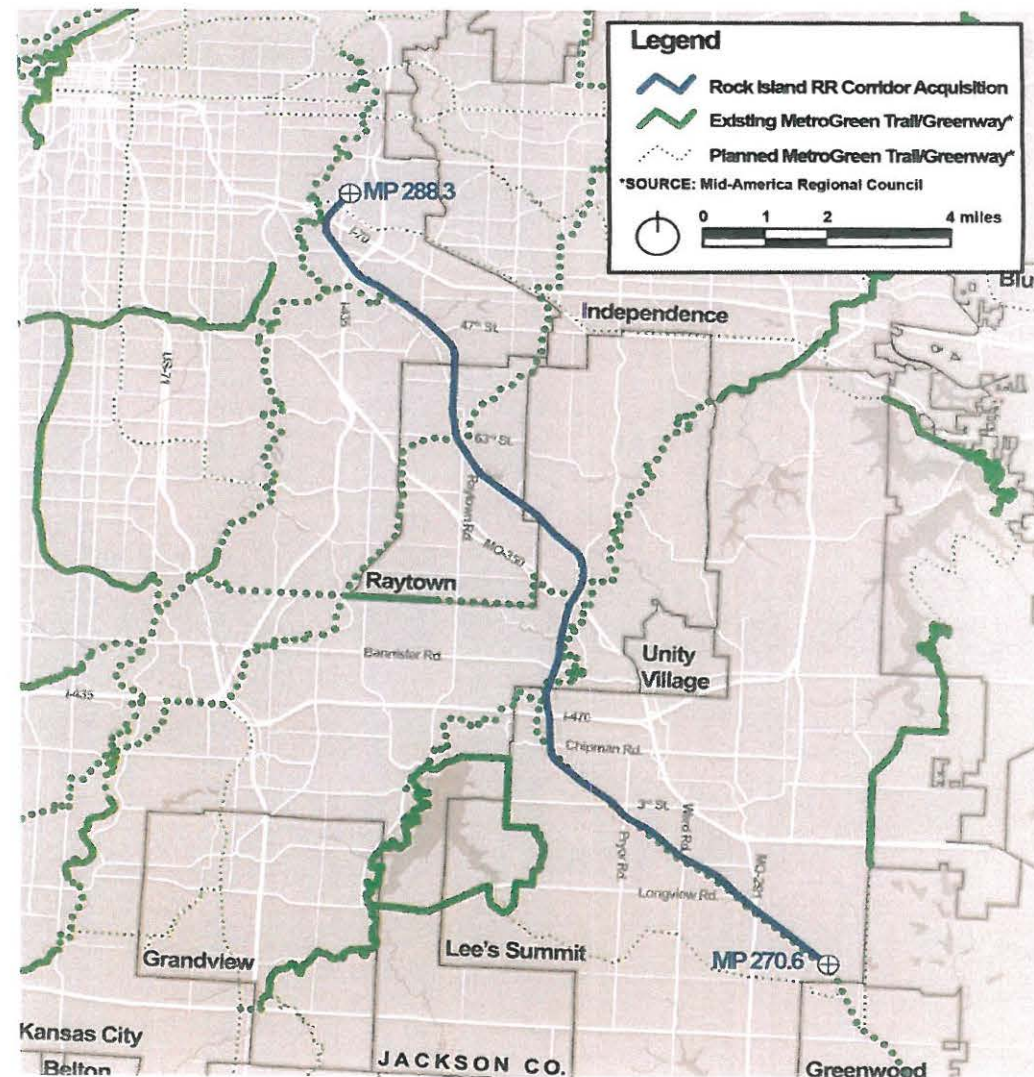
A photograph of a black and red Rock Island locomotive, number 158, traveling through a mountainous landscape. The locomotive is in the foreground, moving towards the viewer. The background features rugged, rocky mountains under a cloudy sky. The locomotive has "ROCK ISLAND" written on its side and a "Rock Island" logo on the front.

Rock Island Rail Corridor

Blue Valley Industrial Association – 10/9/2018

Rock Island Basics

- 17.7 Miles
- Formerly Owned by Union Pacific RR
- Out of Service, but Active RR
- Both a Trail and Transit Project
- Kansas City's Katy Trail Connection



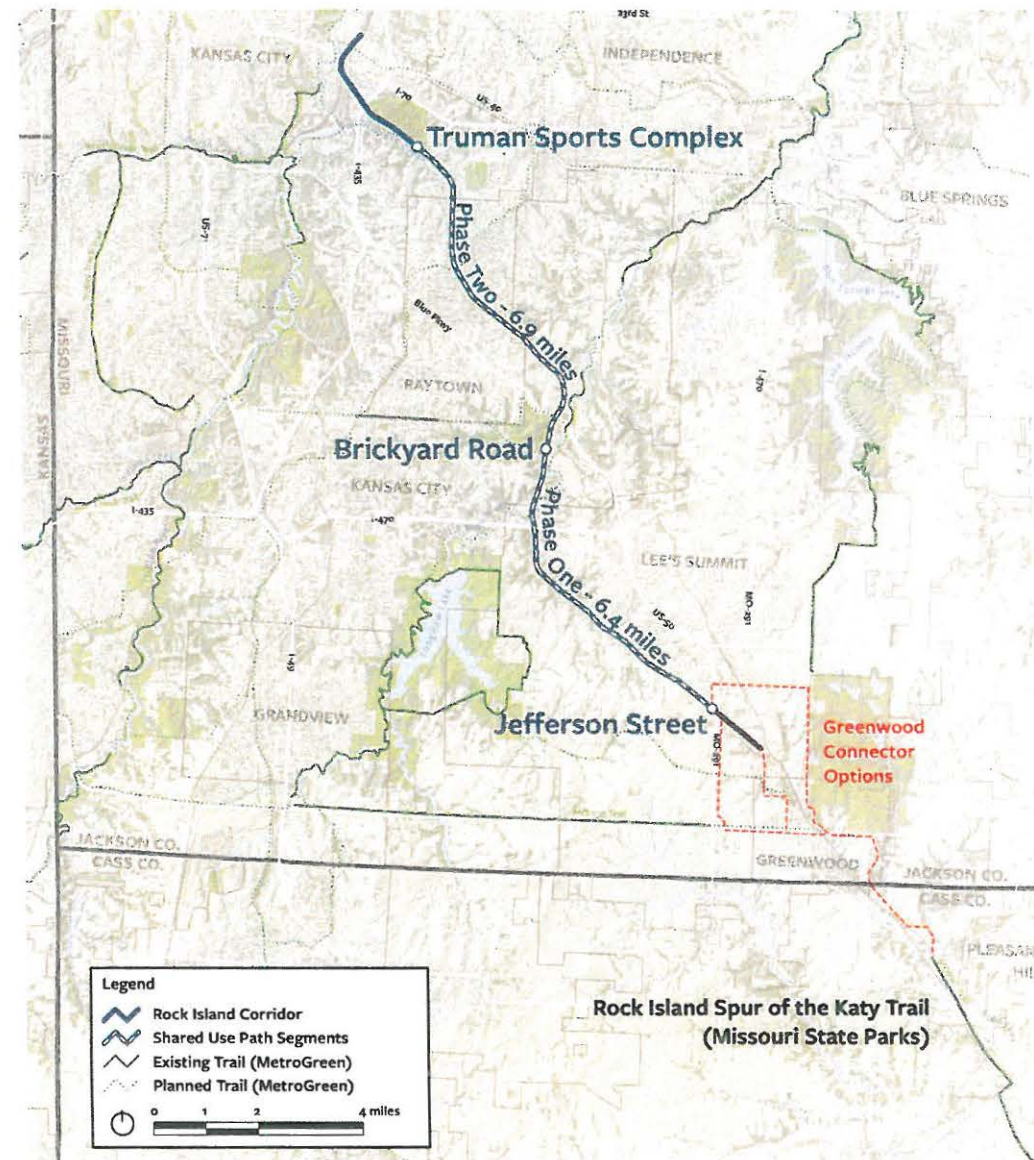
Corridor Acquisition

- **March 2013:** Alternative Analysis identifies the preferred use of the Rock Island to be a commuter rail and trail corridor.
- **November 2013:** Jackson County enters an MOU with Union Pacific.
- **September 2015:** The KCATA Board votes unanimously to partner with Jackson County to acquire the corridor.
- **On May 2, 2016,** Jackson County acquires the corridor from Union Pacific.



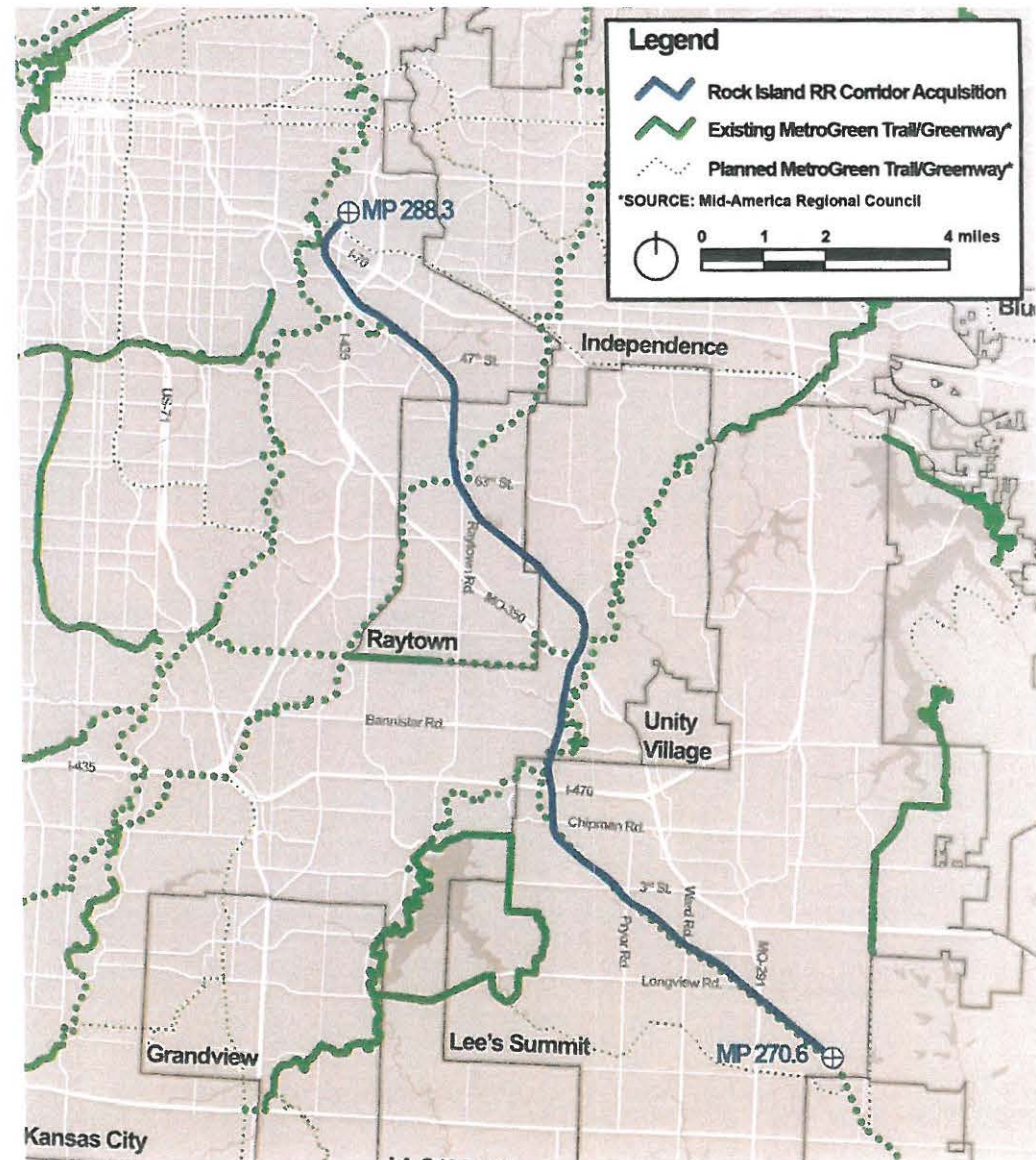
Schedule

- **Phase One:**
 - **BEGIN:** Jefferson Street (Lee's Summit)
 - **END:** Brickyard Road (KCMO)
 - **LENGTH:** 6.4 miles
 - **Completed** mid-2018
- **Phase Two:**
 - **BEGIN:** Brickyard Road (KCMO)
 - **END:** Truman Sports Complex (KCMO)
 - **LENGTH:** 6.9 miles
 - **Beginning** mid-2018
- **Future:**
 - Greenwood Connector
 - Little Blue Trace Trail
 - Blue River Connection
 - Independence Connection



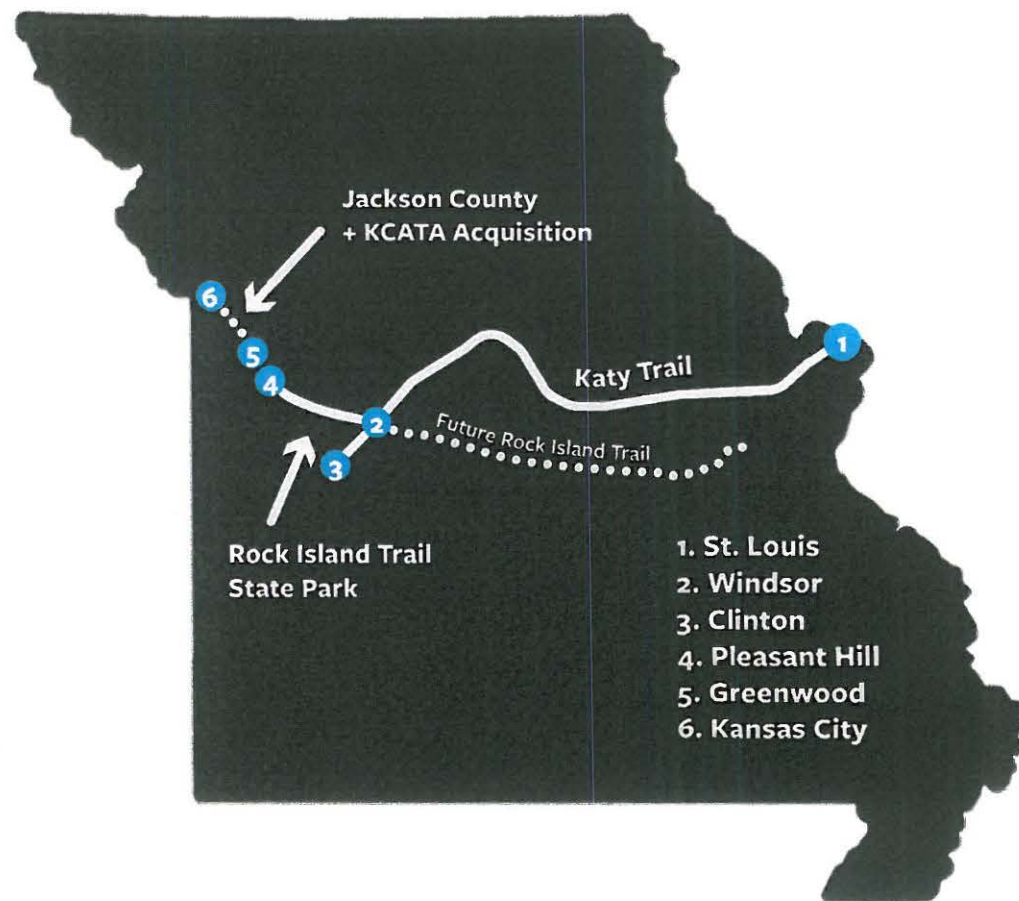
Metro Trail Connections

- Little Blue Trace Trail
 - Kansas City, Independence
- Three Trails Corridor
 - Sugar Creek to Gardner
- Blue River Trail
 - Brush Creek Trail to Plaza
 - Swope Park
 - Indian Creek Trail to Olathe



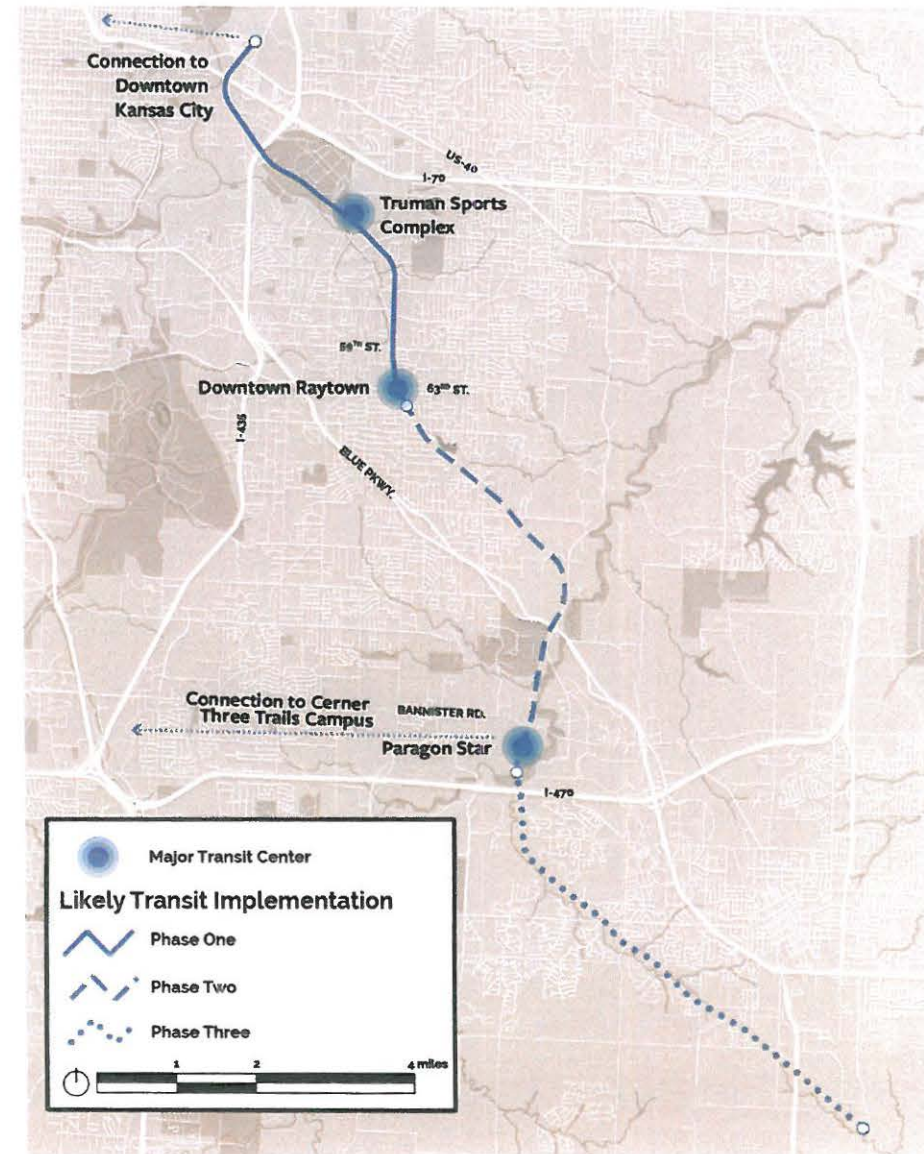
Kansas City to St. Louis

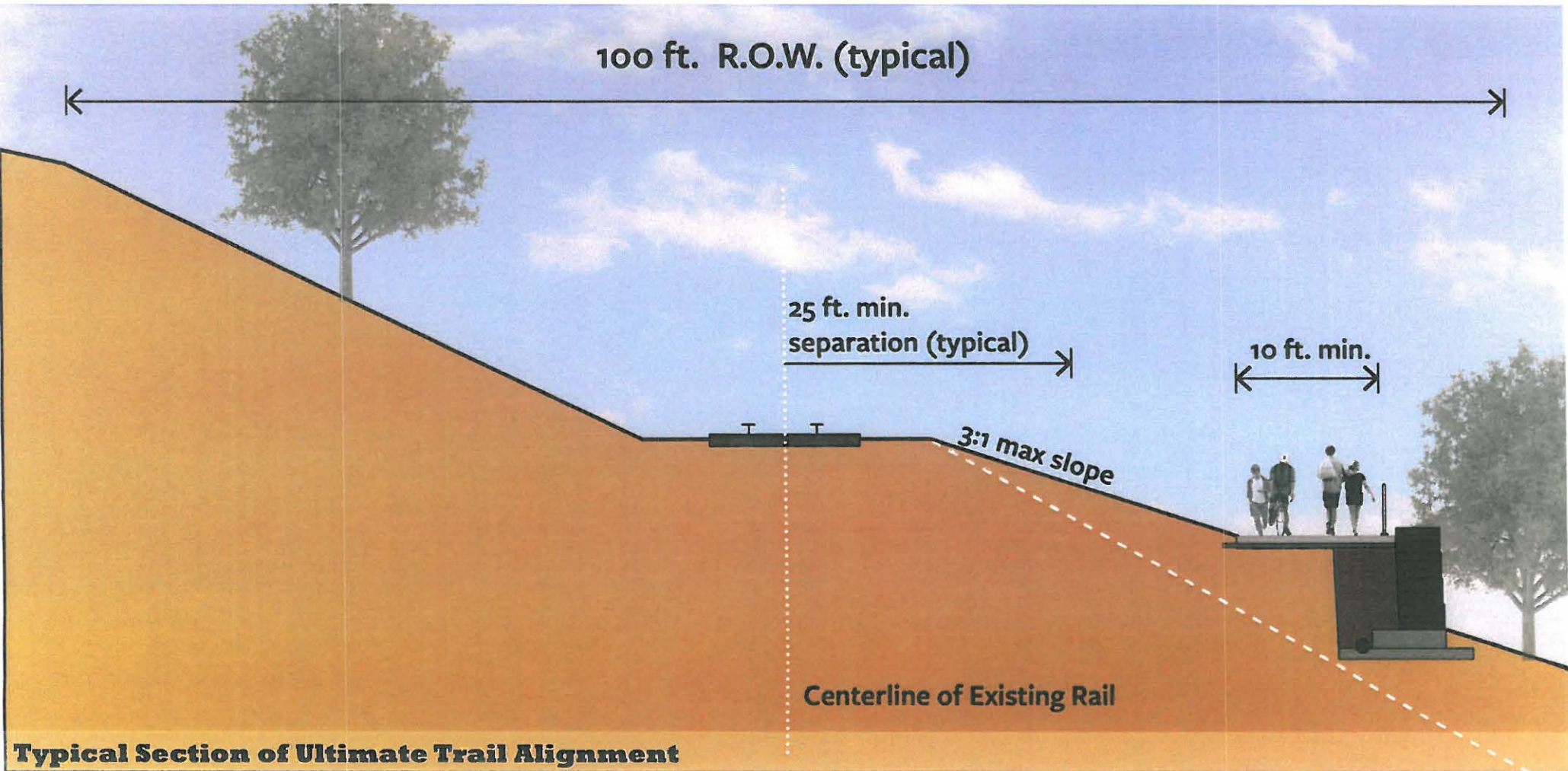
- The Katy Trail is the nation's second longest trail with rails, offering nearly 238 miles of scenic bicycle and pedestrian trail
- Annual trail usage is at roughly 400,000 visitors per year
- In 2012, an economic impact study found that communities near the Katy Trail experienced \$10.4 million in direct trail spending, translating to some 300+ jobs
- Kansas City's connection will unlock access to another major metropolitan area, amplifying trail use and spending
- The trail will connect to a broader Kansas City MetroGreen system



Preserving the Corridor

- While the shared use path is being implemented now, it's being done in a way to preserve the corridor for future transit.
- High-capacity transit is the primary purpose of the corridor in the long- or mid-term
- Trail or “shared use path” development will be a valuable amenity that can be delivered in the short term and drive private development and provide a ridership base for high-capacity transit



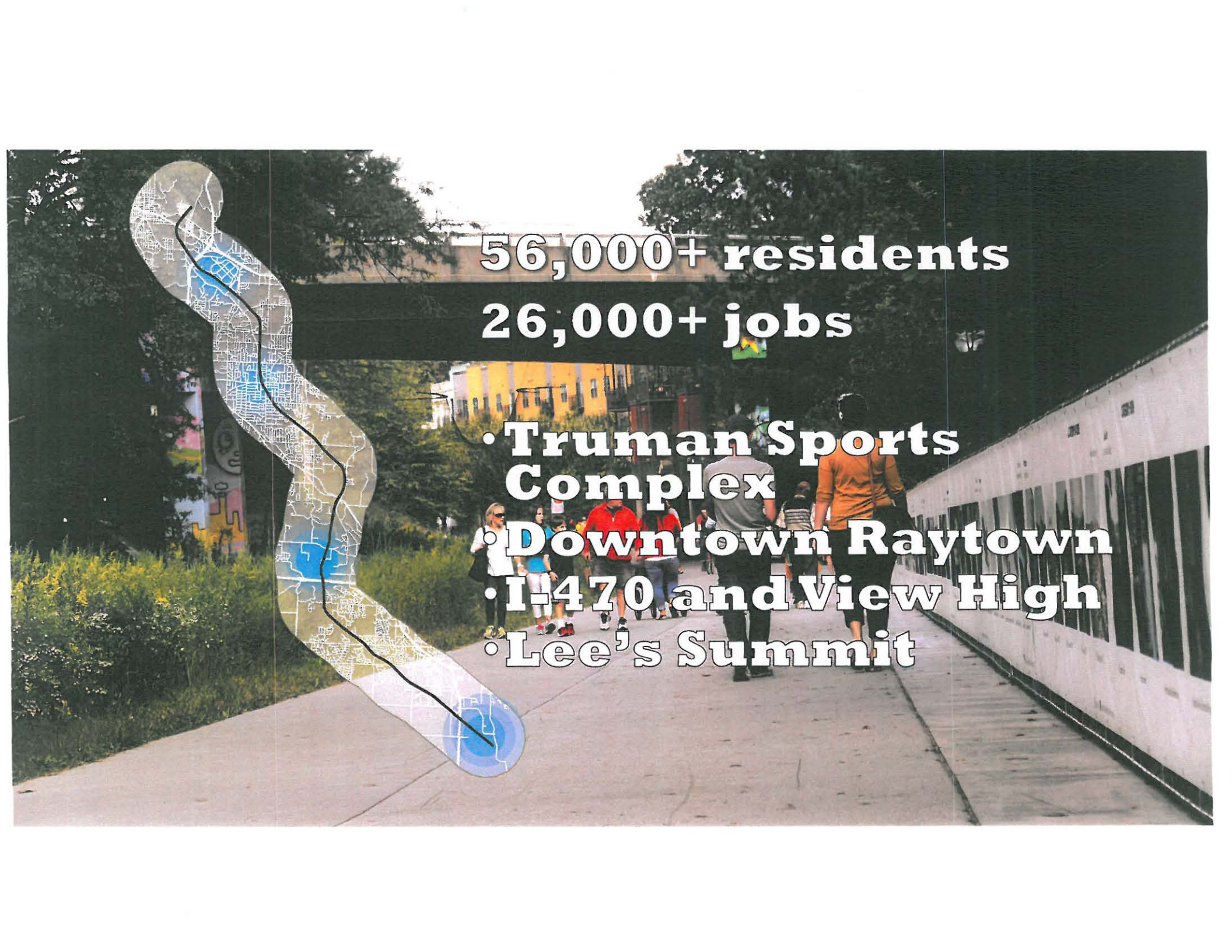


100 ft. R.O.W. (typical)

10 ft. min.

3:1 max slope

Typical Section of Interim Trail Alignment



56,000+ residents

26,000+ jobs

- **Truman Sports Complex**

- **Downtown Raytown**

- **I-470 and View High**

- **Lee's Summit**



3.5-11% increase in single-family residential property values

**Little Miami Scenic Trail (Cincinnati to Columbus, OH)
Monon Trail (Indianapolis, IN)**



Bicyclists, Pedestrians & Transit users spent 1.42x at shops, restaurants, and bars as drivers

Portland, OR survey of commercial establishments



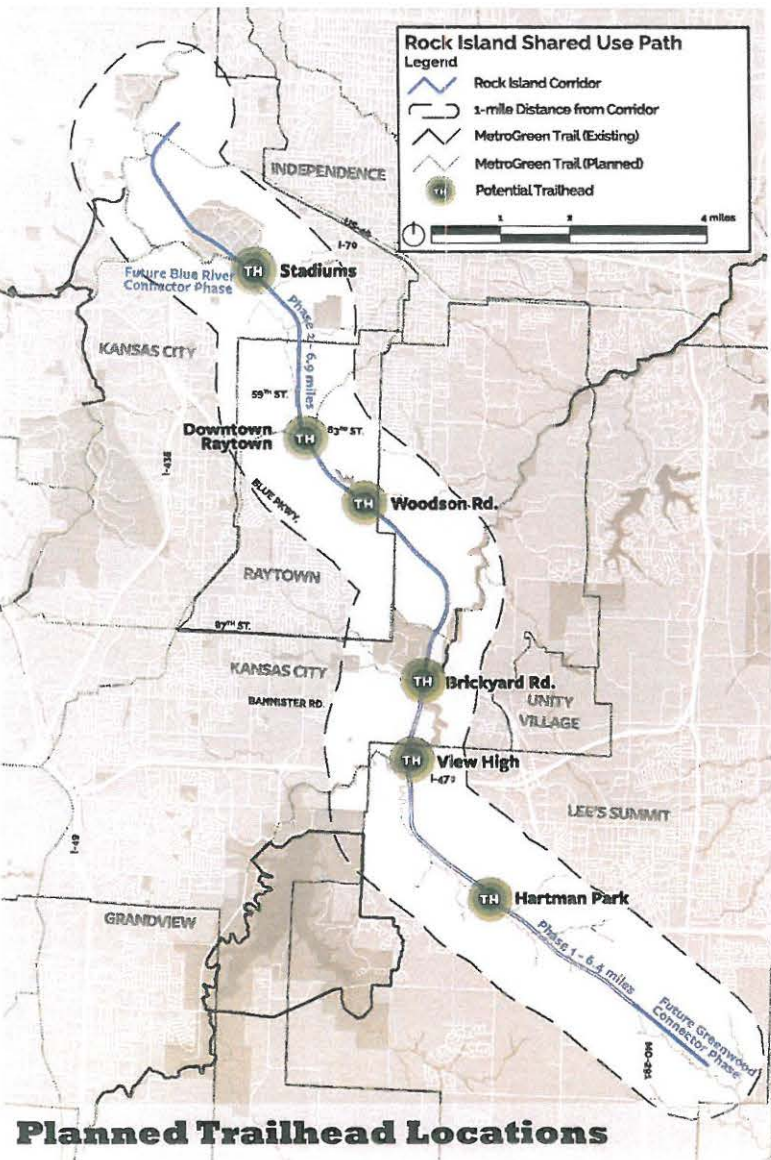
**People who take up
cycling save, on average,
\$150 a year on medical
costs**

NCHRP National Cost-Benefit Study



**People are willing to
spend an extra 20.38
minutes commuting on a
bike path than on the
street**

NCHRP National Cost-Benefit Study



BASIC TRAILHEAD

- PARKING
- BASIC SIGNAGE
- BENCH
- LITTER RECEPTACLE
- BOLLARDS
- BIKE RACK

+

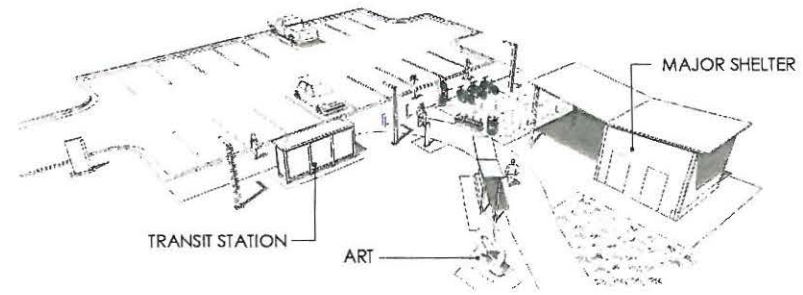
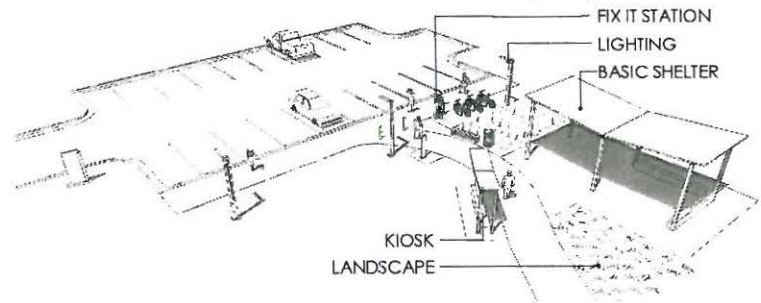
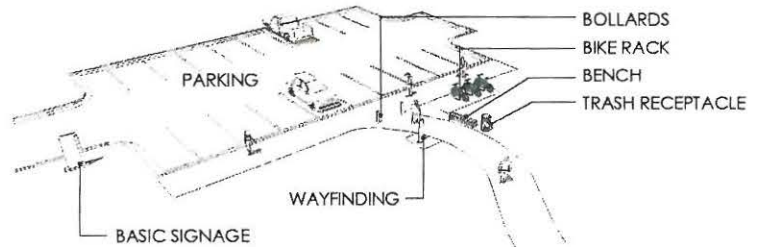
MINOR TRAILHEAD

- LIGHTING
- KIOSK
- BASIC SHELTER
- FIX IT STATION

+

MAJOR TRAILHEAD

- MAJOR SHELTER (RESTROOMS AND DRINKING FOUNTAIN)
- PUBLIC TRANSIT STATION



Trailhead Evolution & Placemaking

- **TODAY:**

- Basic parking lot and amenities
- Funded through Federal dollars

- **TOMORROW:**

- Enhanced amenities
- Trail-side and Transit-Oriented Development
- Bike Share & Dock-less B-Cycle
- Partnerships with businesses, volunteers, cities, and developers
- Opportunities for sponsorship, events, corridor lease agreements, etc.





Historic Raytown Depot & Raytown Rd. Bridge circa 1960 (courtesy Raytown Historical Society)



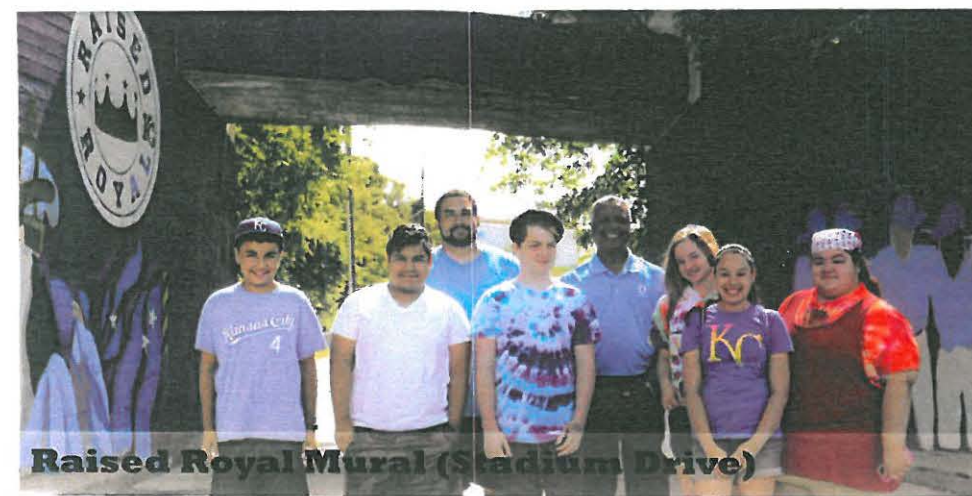
Conceptual Raytown Trailhead Rendering (Confluence)



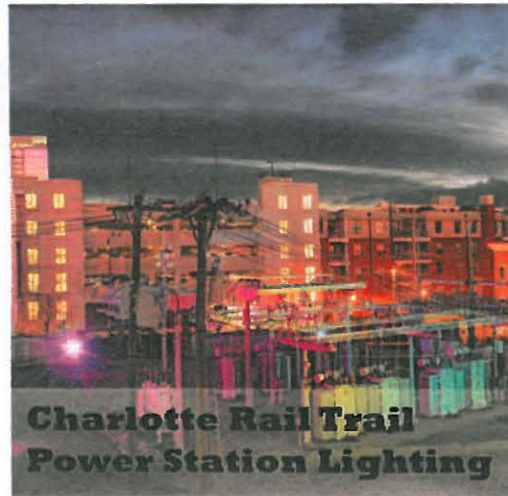
Portland, Oregon Highway Underpass



Charlotte Rail Trail "Magic Carpets"



Raised Royal Mural (Stadium Drive)



Charlotte Rail Trail Power Station Lighting

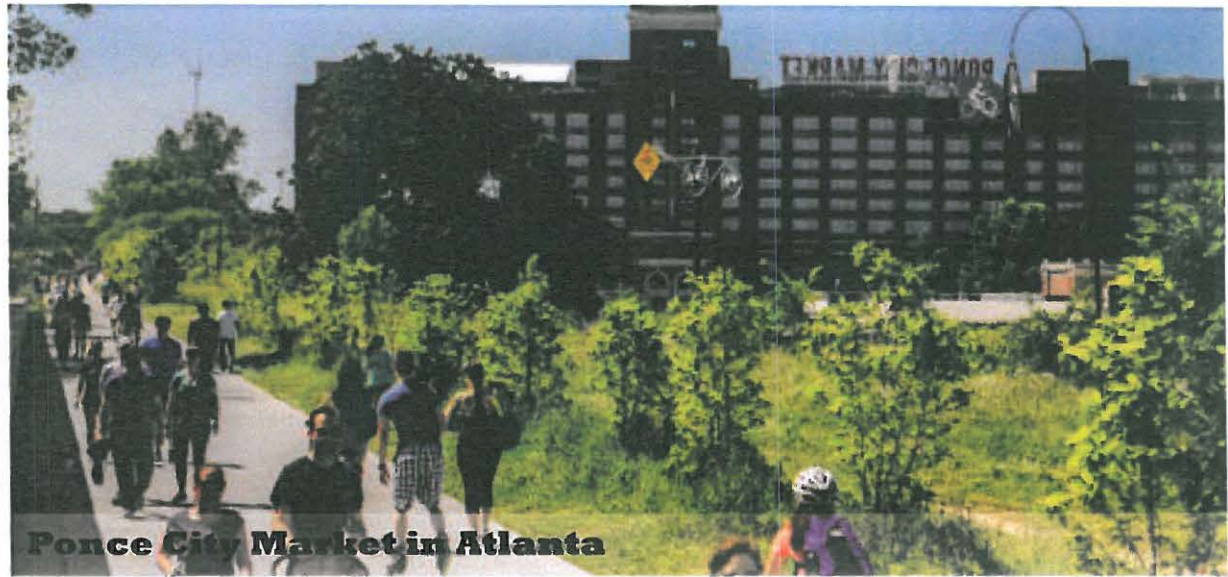


Atlanta Beltline Westside Trail Tunnel

ART TRANSFORMS BLIGHTED INFRASTRUCTURE



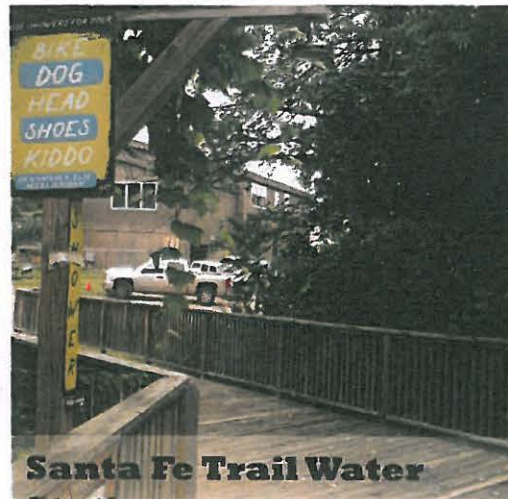
Charlotte Rail Trail



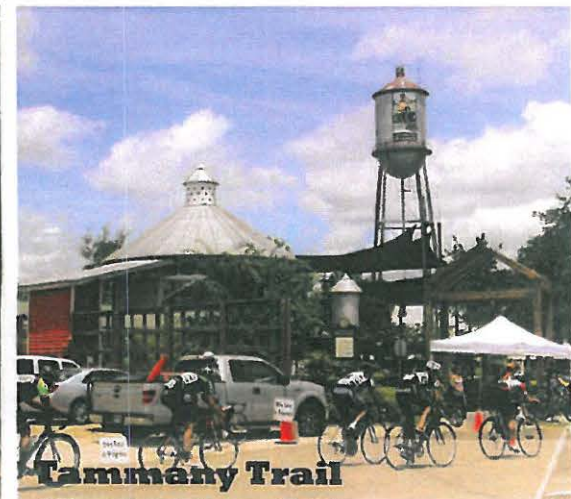
Ponce City Market in Atlanta



Katy Trail Ice House (Dallas, TX)



Santa Fe Trail Water Station



Tammany Trail (Covington, LA)



ORGANIC TRAIL-ADJACENT BUSINESSES. What will this look like in Raytown?



Greenwood Connector

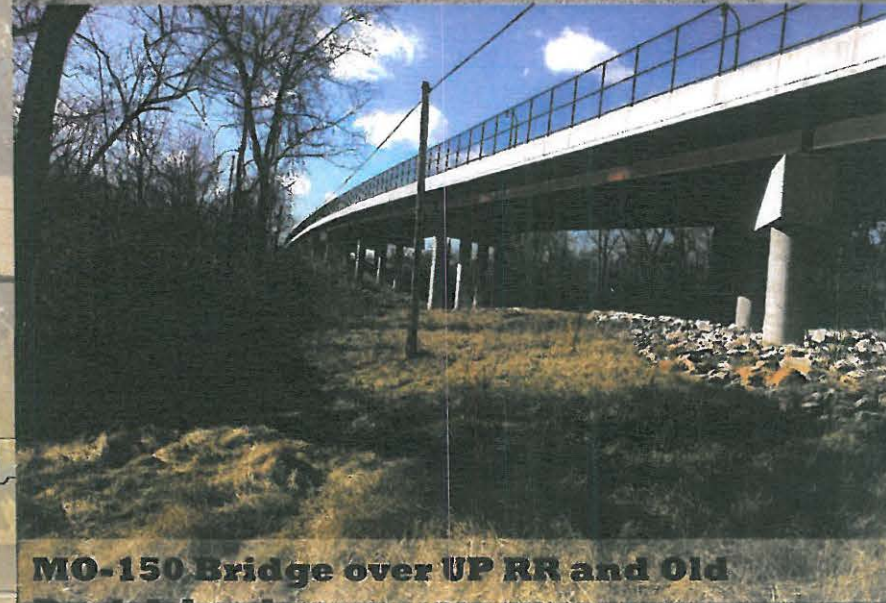
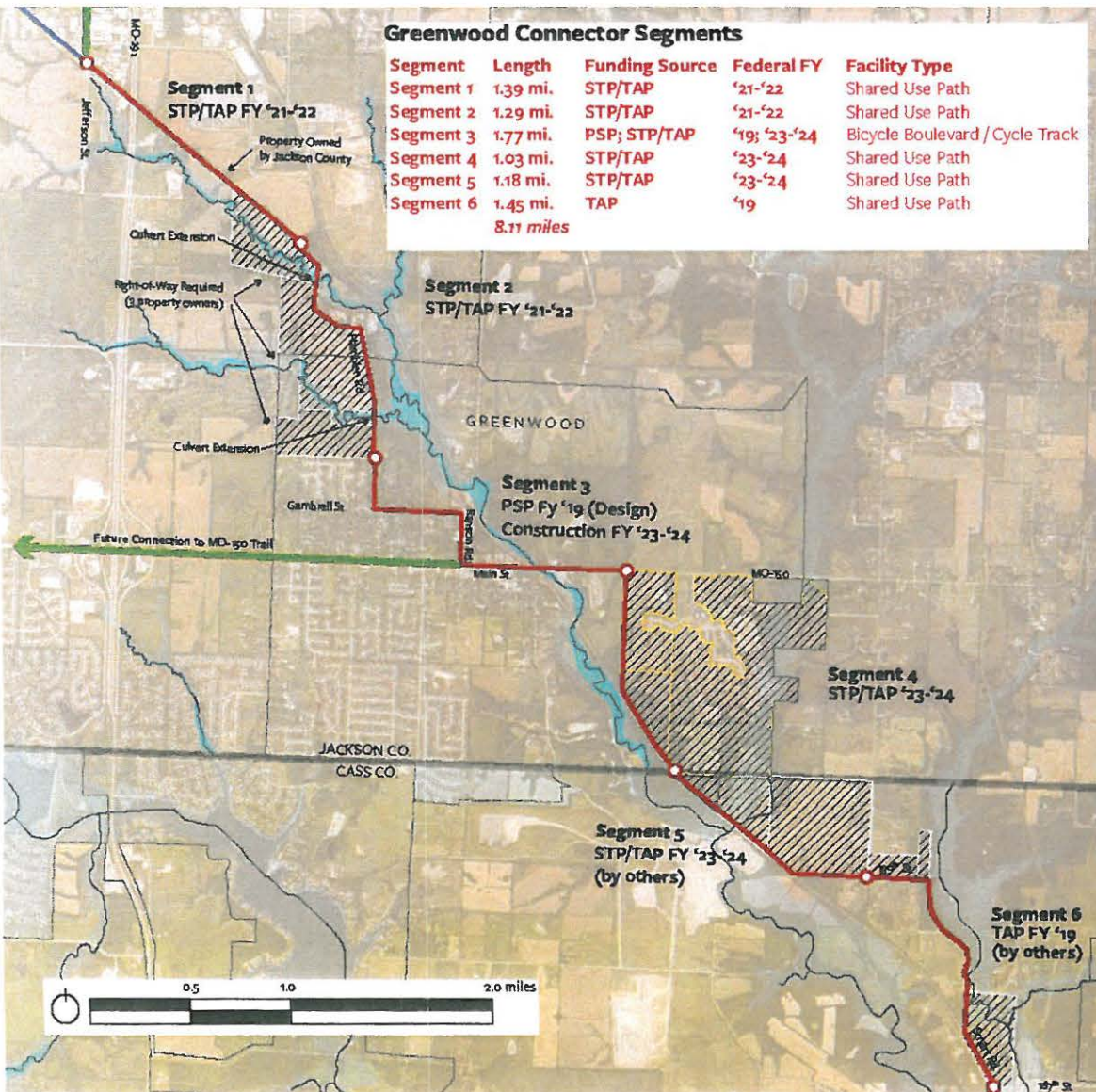
GREENWOOD

LAKE WINNEBAGO

PLEASANT HILL

Greenwood Connector Segments

Segment	Length	Funding Source	Federal FY	Facility Type
Segment 1	1.39 mi.	STP/TAP	'21-'22	Shared Use Path
Segment 2	1.29 mi.	STP/TAP	'21-'22	Shared Use Path
Segment 3	1.77 mi.	PSP; STP/TAP	'19; '23-'24	Bicycle Boulevard / Cycle Track
Segment 4	1.03 mi.	STP/TAP	'23-'24	Shared Use Path
Segment 5	1.18 mi.	STP/TAP	'23-'24	Shared Use Path
Segment 6	1.45 mi.	TAP	'19	Shared Use Path
8.11 miles				



MO-150 Bridge over UP RR and Old

Key Contact Information

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- **Dick Jarrold - Transit**
- **Dennis Hays – Economic Development**

Questions?

