



Kaw Nation

LONG RANGE TRANSPORTATION PLAN

April 2020

DEVELOPED BY CROSS TIMBERS CONSULTING, LLC |

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EXECUTIVE SUMMARY

The Kaw Nation contracted Cross Timbers Consulting, LLC, to assist with the development of the Tribe's Long Range Transportation Plan (LRTP). This LRTP has been developed under the guidelines of the Tribal Transportation Program (25 CFR Part 170) and to reflect the Tribe's values and concerns.

The objectives of the plan are

- to satisfy the requirements of 25 CFR Part 170;
- to provide an accurate overview of the existing transportation system;
- to identify roads that will provide safe and efficient public access to all Tribal properties and facilities within the jurisdictional boundaries;
- to plan for the maintenance of existing facilities and for the construction of future transportation facilities;
- and, to assist the economic development of the Kaw Nation while protecting natural and cultural resource values.

Introduction

Tribal Transportation Program

The Tribal Transportation Program (TTP), originally known as the Indian Reservation Roads (IRR), addresses the transportation needs of federally recognized Indian Tribes in the United States. The TTP is administered by the Federal Highway Administration (FHWA) and the Bureau of Indian Affairs (BIA) in accordance with the Memorandum of Agreement (MOA), dated May 1983. This Long Range Transportation Plan (LRTP) has been prepared for the Kaw Nation (Kaw Nation) in accordance with that MOA.

The BIA is an agency of the United States Department of the Interior (DOI), with the primary responsibility for the administration and management of approximately 66 million acres of land held in trust by the United States for American Indians, Indian Tribes, and Alaska Natives. The BIA Division of Transportation (BIADOT) is the Division of the BIA that oversees the road maintenance and road construction programs for the TTP.

National Tribal Transportation Facility Inventory (NTTFI)

The National Tribal Transportation Facility Inventory (NTTFI), as defined in 25 CFR Part 170, includes any facility that provides access to or is located within tribal lands. These roads, trails, and other facilities provide safe and adequate transportation and public access to, within, and through Indian reservation and native communities for Native Americans, visitors, recreational users, resource users, and others, while contributing to the health and safety and economic development of Native American communities (<https://flh.fhwa.dot.gov/programs/ttp>).

Purpose and Scope

Purpose

The purpose of this LRTP is to serve as a foundation and guide for the development of the Transportation Improvement Program (TIP). The traditional LRTP is a 20-year vision document that identifies, examines, and evaluates present and future transportation needs. This document will assist tribal leaders in the transportation decision-making process.

The LRTP will consider the potential transportation impacts of existing and planned Kaw Nation projects to establish a prioritized list of transportation needs and to estimate time and monetary investments for transportation improvement projects. The LRTP will include:

- An evaluation of a full-range of transportation modes and connections between modes such as highway, rail, air, and water, to meet transportation needs;
- Trip generation studies, including determination of traffic generator due to land use;
- Social and economic development planning to identify transportation improvements or needs to accommodate existing and proposed land use in a safe and economical fashion;
- Measures that address health and safety concerns relation to transportation improvements;
- A review of the existing and proposed transportation system to identify the relationships between transportation and the environment;

- Cultural preservation planning to identify important issues and to develop a transportation plan that is sensitive to tribal cultural preservation;
- A prioritized list of short- and long-term transportation needs
- An analysis of funding alternatives to implement plan recommendations.

Scope

The goals of the Kaw Nation's Roads Department are to provide safe and convenient public access within the Kaw Nation's boundaries and tribal statistical area, to consider public access to new development, to conform and complement with the area-wide transportation systems, to assist with the economic development of the Kaw Nation, and to account for and incorporate the preservation and enhancement of cultural and environmental resources.

Public involvement is critical to understanding the tribal community's values and perceived needs, establish consensus, and raise community concerns. Through public meeting and other tribal venues, the Kaw Nation will solicit public participation as part of this LRTP development. Due to the COVID-19 outbreak, public meetings were forbidden at the time of the LRTP development. Therefore, the Kaw Nation Transportation Director engaged with Tribal and community leaders and received feedback from them regarding the LRTP development process.

Funding Allocations

The Tribal Transportation Program (TTP) is a program of the Federal Highway Administration (FHWA), Office of Federal Lands Highway, that provides funds to federally-recognized tribes for their transportation needs (23 USC 202) using a statutory formula based on tribal population, road mileage, and average tribal shares of the former Tribal Transportation allocation methodology formula. The TTP and associated TTP Bridge Program and TTP Safety Funds are the primary resources of funding for tribal transportation programs.

The TTP program received \$456 million under Fixing America's Surface Transportation Act (FAST Act) in 2016. The FAST Act is a five-year highway bill authorizing \$2.425 billion for the TTP from 2016 to 2020. As a provision of FAST Act, the Tribal Self-Governance Program extends to give Tribes greater decision-making authority over how their TTP funds are spent. TTP funds may be used for transportation planning, design, construction and maintenance, including safety, and a multitude of other transportation related purposes (Appendix A to Subpart B of 25 CFR Part 170).

Part 1 – Overview of the Kaw Nation

1.1 Kaw Nation Culture and History

The Kanza (Kansa) or the Wind People are collectively known as the Kaw Nation. The tribal enrollment is currently over 3,500. The Kaw people were the predominant Tribe in the area now recognized as northern and eastern Kansas, but their hunting territory extended to the west. Westward expansion to the agricultural lands produced by the Missouri and Kansas Rivers disrupted Kaw territory. The Kaw Allotment Act of 1902 stripped the Tribe of any kind of legal status until Indian Reorganization in 1959. In the fall of 1871, the northeast portion of the former Osage holdings was selected, and the Tribe was moved from Council Grove, Kansas, to the 100,000 acres purchased from the Osage Tribe to form the

Kaw Reservation in northern Indian Territory (Kay County, Oklahoma). Through disease and starvation, the population of the Kaw people dwindled from several thousand to less than 200.

In the 1960s, the U.S. Army Corps of Engineers dammed the Arkansas River and built Kaw Lake over most of the designated Kaw Reservation. Many tribal members were displaced and the original settlements inundated. Prior to flooding, the Kaw Council House was relocated and the tribal cemetery was moved north of Newkirk. The main tribal complex is found on the peninsula extending into Kaw Lake.

A more detailed history of the Kaw Nation can be found on the culture page of their website: https://kawnation.com/?page_id=72. The Kaw Nation headquarters is in Kaw City, Oklahoma, and oversees several tribal enterprises and provides health and wellness and education services for its Tribal members of all ages.

1.2 Kaw Nation Tribal Jurisdictional Area

The state of Oklahoma has an estimated population of over 3.9 million, of which over 9% are American Indian/Alaska Native (AIAN). The Kaw Nation tribal jurisdictional area lies in eastern Kay County, a northern Oklahoma county that shares a border with Kansas. Kay County is rural: Ponca City is the largest municipality with a population of 24,033. The town of Newkirk, population 2,317, holds several major Kaw Nation facilities. The tribal headquarters is found in Kaw City, population of approximately 320.

For Tribes in Oklahoma, the U.S. Census Bureau, through the American Community Survey (ACS), identifies and delineates federally recognized Tribes that formerly had a reservation in Oklahoma Territory as an Oklahoma Tribal Statistical Area (OTSA). The boundary of an OTSA is the former reservation in Oklahoma, except where modified agreements with neighboring Tribes for statistical data presentation purposes. The Kaw Nation OTSA extends west beyond the tribal jurisdictional area boundary. Figure 1 (page 4) shows the Kaw Nation boundary and OTSAs within Kay County.

1.3 Kaw Nation Land Characteristics

The Kaw Nation jurisdictional area is located in northern Oklahoma within the Central Lowland physiographic province. The ecoregion is that of Flint Hills. The Flint Hills is a region of rolling hills with relatively narrow steep valleys and is composed of shale and cherty limestone with rocky soils. In contrast to surrounding ecological regions that are mostly in cropland, most of the Flint Hills region is grazed by beef cattle. The Flint Hills mark the western edge of the tallgrass prairie and contain the largest remaining intact tallgrass prairie in the Great Plains.

<https://www.epa.gov/eco-research/level-iii-and-iv-ecoregions-continental-united-states>

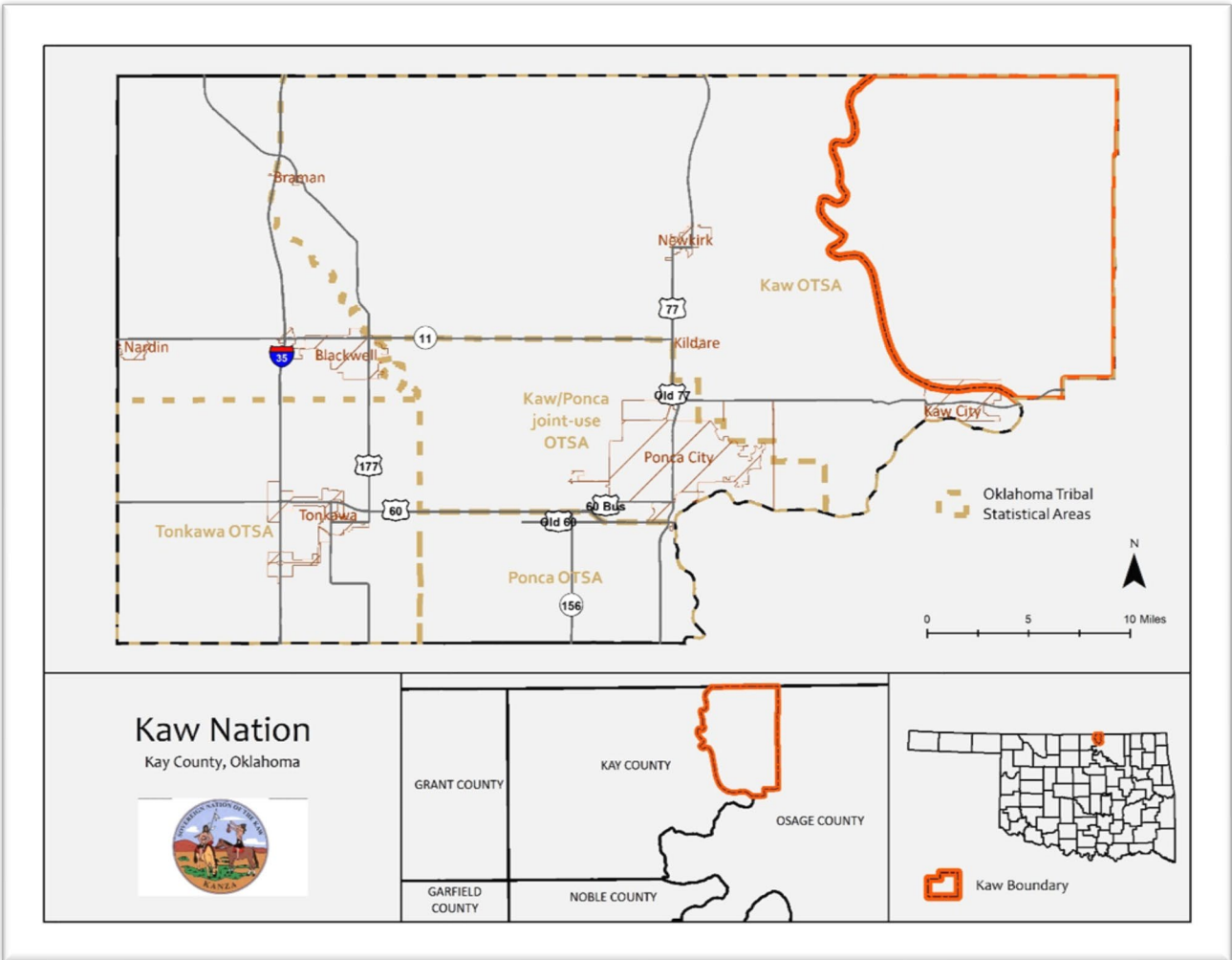


Figure 1. Kaw Nation Tribal Jurisdictional Area

1.4 Demographics

The demographics included in this section were selected because of their relationship with transportation networks and considerations for transportation planning, especially tribal transportation planning. The topics considered relevant are overall population, economic status, employment status, commuting behaviors, and age dependency. The source of the data examined is from the U.S. Census Bureau, American Community Survey (ACS) 2017 unless otherwise cited.

1.4.1 The Kaw Nation OTSA

Three Tribes have jurisdictional areas that lie within Kay County: the Kaw Nation, the Ponca Tribe, and the Tonkawa Tribe. Demographic data is collected for each of these tribal statistical areas.

The overall population of Kay County is 45,173, of which 14.7% is AIAN (alone or in combination). The Kaw OTSA population is 5,907. The Kaw/Ponca joint-use OTSA population is 26,437, the majority of whom live in Ponca City.

NTTFI routes cover the Kaw Nation OTSA and the Kaw/Ponca joint-use OTSA. For the purpose of this study, Kaw OTSA and Kaw/Ponca joint-use OTSA comprise the geographic region examined and will be collectively referred to as the Kaw OTSAs, multiple values listed respectively.

1.4.2 Household Income

Household income measures can be used to track the economic status of regions. The median household income (MHI) for the state of Oklahoma is \$49,767 and for the country is \$57,652. The MHI is affected by the aging of the population, patterns in work and schooling, and the trends of the local and overall economy. The median household income for the Kaw OTSA is \$48,558, and the Kaw/Ponca OTSA is \$44,502. The income levels are notably lower than the state and the country.

1.4.3 Working Force & Commuters

The labor force participation rate refers to the number of people available for work as a percentage of the total population. It is a measure of the active portion of an economy's labor force. It refers to the number of people who are either employed or are actively looking for work. Within the Kaw Nation OTSAs, in the population 16 years and over, the Labor Force Participation Rate is 54.8% and 60.1%, below the national rate of 63.2% (U.S. Bureau of Labor Statistics, December 2019).

The unemployment rate is the percentage of unemployed workers in the total labor force. Workers are considered unemployed if they currently do not work, despite being able and willing to do so. The unemployment rate for the Kaw Nation OTSAs is 5.5% and 6.4%. These rates are higher than the Oklahoma unemployment rate which was measured at 3.3% (Oklahoma Employment Security Commission, October 2019) and the national rate which has been holding steady around 3.5% (U.S. Bureau of Labor Statistics, January 2020).

The Oklahoma Department of Commerce is the primary economic development entity in the state whose mission is to create and deliver high-impact solutions that lead to prosperous lives and communities for all Oklahomans. The Kaw Nation is part of the Northern Oklahoma Workforce as defined by the Oklahoma Department of Commerce. The Northern Oklahoma Region is comprised of the following counties: Garfield, Grant, Kay, Noble, Pawnee, Osage, and Washington (Appendix A). Commuter data from the Department of Commerce shows that in Kay County, 91% of workers live and work in the same county; 4% work in the region but not in the county; and, 5% commute outside of the Northern Oklahoma region. This means that the road network within Kay County is vital for those who live and work there.

The commuter demographics of the Kaw Nation OTSAs show that the majority of people commute alone. Public transportation is not widely available although two transit services operate within Kay County. The road network is dominated by personal vehicles. Table 1 shows the commuter types within the Kaw Nation OTSAs.

Table 1. Commuter Types of the Kaw Nation OTSAs

Commuter Type	Number
Car, Truck, Van (Alone)	11,575
Car, Truck, Van (Carpool)	1,243
Public Trans. (no Taxi)	21

Commuter Type	Number
Motorcycle	1
Bicycle	23
Pedestrian	353
Other Means	117
Work At Home	326

1.4.4 Employment Status

The labor force participation rate (LFPR) is a measure of an economy's active workforce, one of the factors of production. The U.S. labor force participation rate is defined as the number of employed and unemployed (but looking for a job) as a percentage of the population aged 16 years and over. Over the last decade, the LFPR has declined across the country, largely due to the recession from 2008-2010. Since 2016, the national LFPR has improved and as of January 2020, the U.S. LFPR was 63.4%. In Oklahoma, the statewide LFPR has been declining over the last decade and reached a low of 61.0% in 2016 where it has leveled off (<https://www.ok.gov/oesc/documents/lmichgoklfpr.pdf>).

The Kaw OTSA LFPR was 54.8% and the Kaw/Ponca joint-use OTSA 60.1%.

The unemployment rate represents the number of unemployed as a percentage of the civilian labor force (aged 16 and over). The unemployment rate for the country has been at markedly low over the last year. The national rate was 3.6% as of January 2020. In December 2019, the state unemployment rate was 3.4%.

The Kaw OTSA unemployment rate was 5.5% and the Kaw/Ponca joint-use OTSA was 6.4%. Both of these are much higher than the state and national rates.

1.5 Existing Land Use and Services Provided

1.5.1 Residential

The Kaw Nation Housing Authority helps Native American families rent or purchase homes within the towns of Newkirk, Kaw City, Ponca City, and Blackwell. The Authority provides several housing-support options for tribal members that include low-income housing, down payment assistance, maintenance and repairs, storm shelters, and college and youth housing assistance. On trust land, north of Newkirk, lies the White Plume tribal housing addition. https://kawnation.com/?page_id=163

1.5.2 Education / Health Care

Cultural and academic education and health and wellness are priorities for the Kaw Nation. The Kanza Education and Learning Center opened in 2010 and offers library resources and a gathering place for community sharing and individual learning. The Kaw Nation Education Assistance program provides grants and scholarships for students pursuing higher education and adults seeking vocational/technical training. https://kawnation.com/?page_id=145

The Kaw Nation inventory intersect six school districts that service the area by running regular school bus routes. School bus routes travel considerable distance along county roads and two-lane highways. Blackwell and Kildare schools provided school bus route maps (Appendix B). The Kaw Nation also

requested the Johnson O'Malley Program and received information about eligible Kaw Nation students serviced by the schools in the area. These reports are also included within Appendix B.

The Kaw Nation Tribal Youth Program offers counseling and life skills and education support through cultural activities and tribal member volunteers.

The Kanza Health Clinic in Newkirk is an ambulatory clinic that provides general health and wellness services, diabetic services, dental services, women's health services, radiology services, and a pharmacy. The clinic is open to members of any federally recognized Tribe pursuant to Indian Health regulations. Other Tribal health care clinics in the area are White Eagle Health Clinic, the Pawnee Health Center, and Osage Health Clinic. Also in Newkirk is the Kanza Wellness Center that is dedicated to promoted health and wellness within the tribal community.

1.5.3 Economic Impact

Commerce / Enterprises / Gaming and Recreation

The Kaw Nation Business Services (KNBS) and the Kaw Gaming Incorporation (KGI) operate and maintain the business enterprises of the Tribe. The KGI operates the two Southwind Casinos in Newkirk and Braman as well as the gas station at Braman that has slot machines. The KNBS owns and manages the two Smoke Shops which are located in Newkirk and Ponca City, the gas station in Kaw City, and the Woodridge Market in Ponca City. The Kanza Gift Shop (Kaw City) is also under the KNBS purview.

Economic Impact Studies

Kay County is part of the seven counties that comprise the Northern Oklahoma Workforce according to the Oklahoma Department of Commerce. The seven counties are Garfield, Grant, Kay, Noble, Pawnee, Osage, and Washington. The Northern Oklahoma economic region is dominated by oil and gas, public education, health care, and tribal government / enterprises.

The Kaw Nation was a participating Tribe in a study published in 2019 that examined the economic impact of Tribal Nations in Oklahoma (FY 2017). Tribal activities supported over 96,000 jobs in the state, paid out \$4.6 billion in wages and benefits, resulting in a \$12.9 billion total economic impact. The Kaw Nation's casinos and other enterprises benefit rural health care, education, and transportation within the State of Oklahoma.

The complete economic impact study reports are included within Appendix A.

1.5.4 Government / Administration

The People of the Southwind, known as the Kaw Nation, was formally established under the Oklahoma Indian Welfare Act of 1936. The constitution of the Kaw Nation was ratified on April 20, 2011 and amended April 29, 2016.

The Tribal Council is the supreme legislative body of the Kaw Nation. Council members are elected and fill the officer positions of Chair, Vice-Chair, Secretary, and four Council Members. The current Chair is Lynn Williams.

The General Council consists of all citizens of the Kaw Nation, 18 years or older who are deemed mentally competent. A quorum of the General Council is comprised of 25 citizens and is required to meet quarterly.

Part 2 – Transportation System Conditions

2.1 Public Roads

All public roads within the Kaw Nation tribal jurisdictional area are maintained either by the county government, municipalities, and ODOT through MOAs (Memorandum of Agreements) with the Kaw Nation. The Kaw Nation also has tribally owned roads and transportation facilities which are managed and maintained through the Tribal Transportation Program.

2.2 Bridges

With over 23,000 bridges (on-highway system and off), Oklahoma has consistently ranked as one of the worst states for structurally deficient bridges. In December 2004, the number of structurally deficient on-system bridges reached a peak of 1,168 (17% of all bridges in Oklahoma). Since that time, ODOT has placed a priority on bridge improvements. By the end of 2010, there were 706 structurally deficient bridges. FHWA statistics show that Oklahoma was down to 185 structurally deficient bridges at the end of 2017. Effective in 2018, the definition of “structurally deficient” was updated. Bridge Condition is now determined by the lowest rating of the National Bridge Inventory (NBI) condition ratings for Deck (Item 58), Superstructure (Item 59), Substructure (Item 60), or Culvert (Item 62). If the lowest rating is greater than or equal to 7, the bridge is classified as Good; if it is less than or equal to 4, the classification is Poor. Bridges rated 5 or 6 are classified as Fair.

<https://www.fhwa.dot.gov/bridge/britab.cfm>.

The on-system bridges are those on the state highway system. These bridges are inspected by ODOT on a biannual cycle. Within the Kaw Nation OTSAs there are 44 on-system bridges; of these, 17 were built prior to 1965.

The off-system bridges are those which carry the county roads and rural communities. Within the OTSAs, there are 281 off-system bridges. Of these, 161 were constructed prior to 1965; and, over a hundred had a sufficiency rating of 50 or less. A bridge sufficiency rating of 50 or less classifies it as structurally deficient and eligible for the Tribal Transportation Bridge Funding.

The Tribal Transportation Bridge Program is focused on improving the number of structurally deficient bridges. Under the FAST Act, up to 3% of TTP funds are available each year for improving deficient bridges. Tribes may apply for funding for planning, design, engineering, preconstruction, construction, and inspection, or to replace, rehabilitate, seismically retrofit, or paint TTP eligible bridges.

The Kaw Nation has 112 official bridges listed on its National Tribal Transportation Facility Inventory. This number does not reflect several bridges pending inclusion (as of February 2020). The Kaw Nation roads department is currently in the process of reconciling the bridges on the NTTFI with those on the ODOT inventory and National Bridge Inventory. The complete list of all Kaw Nation bridges can be found in Appendix C.

2.3 Public Transit

The Kaw Nation does not have a formal transit program but it does provide shuttles in and out of casinos. Tribal members are able to use the on-demand transit services of the Ponca Tribe.

Public transportation options for Kay County are Cimarron Public Transit and Cherokee Strip Transit. Cimarron provides demand response public transit primarily originating in and around Marland,

Newkirk, Ponca City, Ranch Drive and White Eagle. Cherokee Strip provides demand response public transit primarily originating in and around Blackwell, Braman, Kaw City, Peckham and Tonkawa.

2.4 Pedestrian / Bicycle Facilities and Trails

Pedestrian activity is common in Native American communities, especially near tribal complex areas. A walking trail exists around the Environmental Building at the Kaw Nation complex in Kaw City. Ponca City built and maintains six walking / jogging trails throughout the city.

- <https://www.poncacityok.gov/616/WalkingJogging-Trails>

The town of Newkirk is currently building the Newkirk Fitness Pathway. The project was initiated by a middle-school student who developed a plan to develop a fitness path, story walk, and bike share program. Pathway Day, the inauguration of the Newkirk Fitness Path, was celebrated on April 27, 2019.

These links tell more about the Newkirk Fitness Pathway:

- https://news.okstate.edu/articles/agricultural-sciences-natural-resources/2019/gedon_catalyst_for_change.html
- <https://www.newkirkherald.com/2019/05/01/community-rallies-for-pathway-day/>

2.5 Law Enforcement and Emergency Response

The Kaw Nation Tribal Police Department (KNTPD) provides law enforcement services for the Tribal jurisdictional area. Officers serve the public by enforcement of the tribal laws on trust land, through a mutual aid agreement with the town of Newkirk, and rendering assistance as needed throughout Kay County.

2.6 Airport and Heliport

Three small airports, two private and one public, lie within the Kaw OTSA boundaries. The public airport is located in Ponca City. One of the private airports lies midway between Ponca City and Kaw City; the other private airport lies just west of Newkirk.

2.7 Kaw Nation NTTFI

The Kaw Nation's NTTFI consists of tribal roads, county or township roads, and state roadways. A map of the Kaw Nation NTTFI is shown in Figure 2 (page 10). This map represents roadways and other transportation facilities, such as parking lots, that are currently on the Kaw Nation's NTTFI. As of January 2020, 121 routes currently hold Official status within the Road Inventory Field Data System (RIFDS) amounting to over 685 road miles. The following table shows the breakdown of official routes by ownership. "Overlap" routes are those routes already inventoried, often by another Tribe, but still considered eligible for Kaw Nation TTP funds expenditure.

Table 2. NTTFI Mileage by County and Ownership

	2 - Tribe	3 - State	5 - County / Township	11 - Overlap	Total
Kaw Nation NTTFI	1.1	37	646.7	0.6	685.4

These numbers reflect the existing NTTFI. The Kaw Nation added routes to the 2020 NTTFI that are awaiting approval. The Kaw Nation plans to add routes for future years as the Tribe continues to increase and improve access to tribal and community facilities. Future transportation plans are discussed further in Section 3.6.

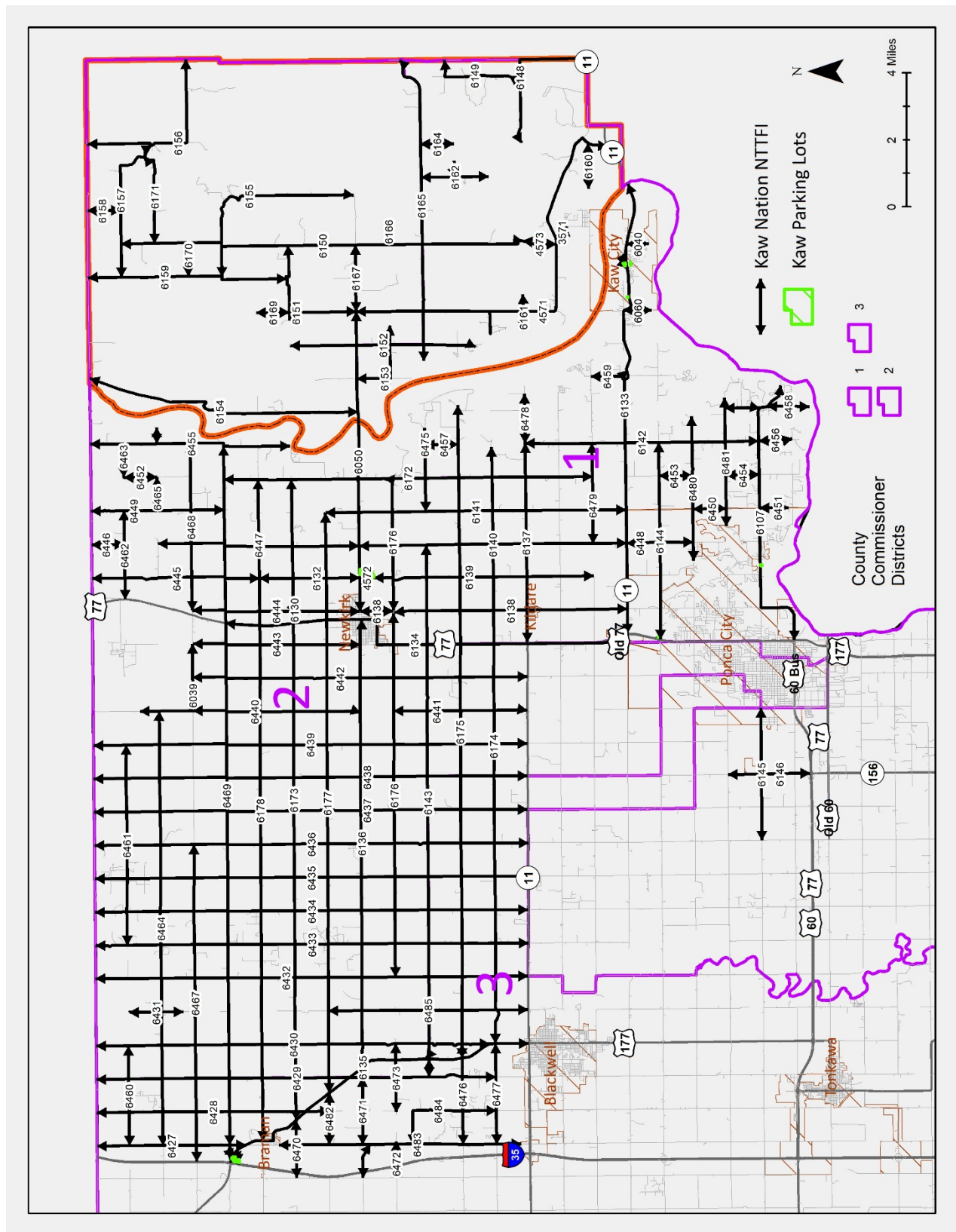


Figure 2. Kaw Nation NTTFI Map

2.8 Traffic Volumes

The Annual Average Daily Traffic counts (AADT) for all the routes listed in the Kaw Nation's NTTFI can be found in Appendix D. These traffic counts were taken from the Oklahoma Department of Transportation's geospatial layer. Any routes that did not have an associated AADT were given a count of 25. Most of the AADT values have been calculated over the most recent five-year span (2013 to 2017), with some variation depending on the most recent recordings by ODOT.

2.9 BIA Road Classifications

The BIA road system has eleven classes of routes: seven vehicular and four non-vehicular. Functional classification is used by the BIA to group roads into a specific vehicular class based on the existing or anticipated function of the road. The road classes are then combined with the traffic characteristics of the road to select criteria and standards for the adequate design of the facility. Definitions of the eleven BIA road system classes are given below, together with the list of roads the BIA-DOT inventory includes in each class. ODOT Rural Functional Classification Maps for the counties covered by the Kaw Nation can be found in Appendix E.

Class 1

These are major arterial roads that provide an integrated network to serve traffic between large population centers. They generally do not have stub connections, have more than two lanes of traffic, and carry an average traffic volume of 10,000 vehicles per day or more. The Kaw Nation has no Class 1 roads on the NTTFI.

Class 2

Class 2 roads are rural minor arterials which provide an integrated network and generally do not have stub connections. They serve traffic between large population centers and may also link smaller towns and communities to major destination areas that attract travel over long distances. They are generally designed for relatively high overall speeds with minimum interference to through-traffic and carry less than 10,000 vehicles per day. Class 2 routes provide for at least inter-county or interstate travel and are spaced at intervals consistent with population density. The Kaw Nation has no Class 2 roads on the NTTFI.

Class 3

Class 3 routes are streets and roads that are located within communities and serve residential or other urban settings. These roads correspond to the Local Roads category in the state highway classification. The Kaw Nation has 0.5 miles of Class 3 roads on the NTTFI.

Class 4

Class 4 routes are rural major collectors which collect traffic from rural local roads. The Kaw Nation has 66.3 miles of Class 4 roads on the NTTFI.

Class 5

These are local rural roads that may include section line and stub-out roads that collect traffic for arterial-roads and make connections within the grid of the Indian Reservation Roads system. Such routes may serve areas around villages or provide access to farming areas, schools, tourist attractions or various small enterprises. This class also includes roads and vehicular trails for administering forests, grazing areas, mining and oil operations, recreation, or other purposes. The Kaw Nation has 617.2 miles of Class 5 roads on the NTTFI.

Class 6

These are city minor arterial streets that are located within communities and provide access to major arterials. The Kaw Nation has no Class 6 roads on the NTTFI.

Class 7

These are city collector streets that are located within communities and provide access to city local streets. The Kaw Nation has 10 miles of Class 7 roads on the NTTFI.

Class 8

Class 8 routes are non-road type projects such as paths, trails, walkways and other routes for public use by foot traffic, bicycles, trail bikes, snowmobiles, all-terrain vehicles, or other nonvehicular traffic. The Kaw Nation has no Class 8 roads on the NTTFI.

Class 9

Class 9 routes encompass other transportation facilities such as parking facilities adjacent to NTTFI routes and scenic byways such as rest areas, other scenic pullouts, ferry boat terminals, and transit terminals. The Kaw Nation has 0.8 miles of Class 9 routes on the NTTFI.

Class 10

Class 10 routes are defined as airstrips that are within the boundaries of the IRR system and are open to the public. These airstrips are included for inventory and maintenance purposes only. The Kaw Nation has no Class 10 routes on the NTTFI.

Class 11

This classification indicates an overlapping of a previously inventoried section, or sections of a route, and is used to indicate that it is not to be used for accumulating needs data. This class is used for reporting and identification purposes only. The Kaw Nation has 0.6 miles of Class 11 routes on the NTTFI.

Grandfathered Routes

Within the Kaw Nation NTTFI, several routes are considered “grandfathered” which means they were added prior to 2004. These routes were submitted without maps so their exact location is difficult to determine.

2.10 Oklahoma DOT Work Plan

ODOT Work Plan projects occur on State Highways, US Highways, or Interstates. Eighteen of these planned projects occur within the boundaries of the Kaw Nation OTSAs. Six ODOT Workplan Bridges fall within the Kaw Nations OTSAs. The Project Work Descriptions of the ODOT projects are given in the tables below. A map of the ODOT work plan projects are included as Appendix F.

Table 3. ODOT Project Work Descriptions within the Kaw Nation (2019-2026)

Project Work Description	Count
GRADE, DRAINING, BRIDGE & SURFACE	1
BRIDGE & APPROACHES	3
BRIDGE REHABILITATION	4
WIDEN & RESURFACE	1
GRADE, DRAIN & SURFACE	3
SHOULDER REHAB.	1
PAVEMENT REHABILITATION	1
RIGHT OF WAY	2
UTILITIES	2
Grand Total	18

Table 4. ODOT Workplan Bridges within the Kaw Nation (2019-2026)

NBI No.	Work Code	Route	Year Built	ADT	Program Year
17943	07 – Grade Drain Bridge & Surface	SH-11: OVER ABANDONED RAILROAD, 0.63 MILES EAST OF US-177 JCT (REMOVE AND FILL)	1970	3600	2025
17573	11 – Bridge & Approaches	US60B: EB & WB OVER BOIS D' ARC CREEK 0.5 MIS. E. OF THE US 60 JCT.	1969	3250	2026
1684	11 – Bridge & Approaches	US 177: OVER UNNAMED CREEK 5.6 MILES N. OF SH 11	1926	790	2023
1685	11 – Bridge & Approaches	US 177: OVER UNNAMED CREEK 7.3 MILES N. OF SH 11	1926	790	2023
17572	11 – Bridge & Approaches	US60B: EB & WB OVER BOIS D' ARC CREEK 0.5 MIS. E. OF THE US 60 JCT.	1969	3200	2026
14416	11 – Bridge & Approaches	I-35: NB & SB OVER THE BLACKWELL NORTHERN RAILROAD 8.6 MIS. N. OF SH 11	1959	7750	2021

2.11 Council Grove, Kansas

Southwest of the town of Council Grove, Kansas, the Kaw Nation holds fee lands known as Allegawaho Memorial Heritage Park. These parcels are part of the original Kaw Reservation assigned in the 1800s. The Memorial Park is listed on the National Register of Historic Places. The roadway on the property belongs to the Kaw Nation. The Kaw Nation transportation department purposes to develop the roadways and walking paths in keeping with the values of cultural preservation and protection.

Part 3 – Transportation Needs Analysis and Priorities

3.1 Community Involvement

As stated in 25 CFR 170.413, the Tribe must solicit public involvement. Following consultation with the Kaw Nation Roads Department, a public involvement plan was developed. To share the LRTP plans and gather input from members of the Kaw Nation and local communities, a presentation was scheduled for the Tribal Council meeting on April 5, 2020. However, due to state-mandated closure of non-essential businesses and shelter-in-place restrictions, all public meetings were canceled through April 30, 2020.

Letters via emails were sent to the respective county commissioners. These contact letters requested a review of the existing NTTFI, the overall Kaw Nation transportation network, and any project suggestions for collaboration with for the Kaw Nation transportation program.

Emails with a link to download the draft LRTP were distributed to a large audience of tribal and community leaders and decision makers. The outreach list and the responses received have been included within Appendix G.

3.2 Safety & Crash Data

The Kaw Nation is committed to improving the overall safety of the transportation system. Through various transportation improvement projects, the roads department of the Kaw Nation continually strives to improve transportation safety for all the citizens within the Kaw Nation jurisdictional area. In 2015, the Kaw Nation developed a Strategic Transportation Safety Plan (STSP) using TTP Safety Funds.

Crash data is researched to identify potential causes of collisions and help prioritize projects based on needed safety improvements. SAFE-T (Statewide Analysis for Engineering & Technology) is a database hosted by ODOT for the purposes of studying crash data. Over a five year period (2014-2018), nearly 2,400 collisions occurred within the Kaw Nation OTSAs boundaries. This count includes highways, city streets, and county roads: this count does not include collisions along the Interstate.

Although ODOT queries for tribal jurisdictional boundaries, the Kaw Nation result does not account for the extent of the NTTFI within the OTSAs. Therefore, the full Kay County collision report from the Oklahoma Department of Transportation is included within Appendix H.

3.3 Environmental Considerations

3.3.1 Environmental Considerations for Long Range Transportation Plans

The Tribal Transportation Program (25 C.F.R. Part 170) outlines the necessity and purpose of a long range transportation plan (LRTP) (§ 170.409). Additionally, guidance is provided on what should be included in an LRTP (§ 170.411). Part (e) of this section documents the need to identify relationships between transportation and the environment. This regulatory guidance is still very general and broad in scope. However, within 25 C.F.R. 170.415 the regulations discuss pre-project planning, part (a) stating: “Pre-project planning and project identification studies... include the activities conducted before final project approval on the TTPTIP. These processes provide the information necessary to financially constrain and program a project...” Activities included in pre-project planning are preliminary environmental and archeological reviews.

The above guidance provides both a fairly broad (§ 170.411.e) and more focused (§ 170.415.a.5) view of how environmental considerations should be included within the transportation planning process. Although these regulations are open to interpretation, they do outline the necessity of including environmental (and historical/cultural) resources into planning. Furthermore, the guidance indicates having enough knowledge concerning these resources, and their effects on proposed projects, to be able to aid in financial determinations within the TTPTIP.

The goal of this section on environmental considerations is to aid in determining the potential impact of environmental resources to proposed projects. These resources are routinely discovered late in the project planning process and often cause unplanned delays and expenditures. Having a general understanding of the resources likely to be encountered along each proposed route can aid in determinations of longevity of projects as well as potential costs.

3.3.2 Environmental Regulations for Tribal Transportation

The National Environmental Policy Act (NEPA) (42 U.S.C. 4321) was enacted in 1970 to:

- declare a national policy which will encourage productive and enjoyable harmony between man and his environment;
- to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation; and,
- to establish a Council on Environmental Quality. Section 102 in Title I of NEPA requires federal agencies, or those with a federal nexus, to incorporate environmental considerations in their planning and decision-making through a systematic interdisciplinary approach.

Specifically, all federal agencies are to prepare detailed statements assessing the environmental impact of and alternatives to major federal actions significantly affecting the environment. All tribal transportation projects utilizing federal funds (i.e., the federal nexus) must submit to the NEPA process, regardless of project intensity. Generally, this means consultations regarding archaeological resources, threatened and endangered species, and water resources.

The Endangered Species Act (ESA) of 1973 (16 U.S.C. 1531 – 1544) provides for the conservation of ecosystems upon which threatened and endangered species of fish, wildlife, and plants depend. The ESA prohibits actions that may harm or jeopardize the continued existence of any threatened or endangered species, or critical habitat.

Critical habitat is a term in the ESA denoting areas designated by the Service that have features essential for the conservation of a threatened or endangered species and that may require special management considerations or protection. The designation of critical habitat does not affect land ownership or establish a refuge, wilderness, reserve, preserve, or other conservation area. It does not allow government or public access to private lands. Federal agencies that undertake, fund or permit activities that may affect critical habitat are required to consult with the Service to ensure such actions do not adversely modify or destroy designated critical habitat. The designation does not affect purely private or state actions on private or state lands or require lands to be positively managed for conservation.

The Clean Water Act (CWA) as amended in 1972 (33 U.S.C §1251) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality

standards for surface waters. Section 404 of the CWA is likely the most pertinent regulation within the CWA in regard to tribal transportation. Section 404 regulates the discharge of dredged or fill material into jurisdictional waters regulated under the CWA. These Waters of the United States (WOTUS) have undergone constant debate over their definition and have recently (early 2020) undergone significant changes.

On 23 January 2020 the EPA and USACE finalized and signed the new Navigable Waters Protection Rule (NWPR), effectively making it guiding rule for determining federal jurisdiction for WOTUS. As of the writing of this document the NWPR has not been published in the Federal Register, however, this is to be expected by mid-2020.

The NWPR outlines 4 clear categories of waters that are considered *Waters of the United States*:

- 1) territorial seas and traditional navigable waters (TNWs),
- 2) tributaries,
- 3) lakes, ponds, and impoundments of jurisdictional waters, and
- 4) adjacent wetlands.

The first 3 categories are essentially the same as what had been established with previous rulings; however, categorizations and definitions of features have changed somewhat. Specifically, tributaries now include only perennial and intermittent rivers and streams that contribute surface flow to TNWs in a typical year and must flow more often than purely in response to individual precipitation events. Likewise, the NWPR provides an updated definition for determining jurisdiction of wetlands, establishing “adjacent wetlands” as an individual category of water to be considered a WOTUS. A wetland is considered “adjacent” to an established WOTUS if it: 1) physically touches a WOTUS, 2) is separated from a WOTUS by only a natural berm or bank, 3) is inundated by flooding from a WOTUS in a typical year, or 4) maintains a direct hydrologic surface connection to a WOTUS (via an artificial feature or flooding in a typical year) even if physically separate from the WOTUS.

These updated definitions of tributaries and wetlands, while somewhat confusing, provide regulatory relief for transportation projects. The relief primarily comes from the deregulation of ephemeral streams and isolated wetlands, which are the primary culprit in delaying projects as far as water resources are concerned.

3.3.3 Environmental Analysis

Two primary environmental resources affecting transportation projects – endangered species and water resources – are outlined in this section and provide a summary of the extent to which these affect each inventoried route. Discussed below are the regulations surrounding these resources, why they are pertinent to tribal transportation projects, the process for collecting the information is described, and lastly, the results of the findings presented. (Appendix I).

Given the importance of the NEPA process to Tribal transportation projects and the ubiquity of both ESA listed species and wetland WOTUS, the relative probability of these resources occurring within each county and intersecting individual routes was determined. This process was based primarily on geospatial intersections between the stated environmental resources and inventoried routes. For ESA listed T&E species, the USFWS maintains a publicly accessible geospatial database of all species delineated ranges, as well as designated critical habitat. Species ranges which overlapped routes were

documented as impacts to these species would need to be addressed within any NEPA review for that route.

A more detailed analysis was used to determine the probability of occurrence for the American burying beetle (ABB) on each route based on the current notorious status of this species affecting transportation projects timing and costs. This analysis was based on all reported ABB trap locations for 2013-2017, which were publicly available through the USFWS Tulsa field office. This data provided locations for traps and documented presence/absence of ABB for each. This presence/absence data was then paired with land use data from the 2011 National Land Cover Dataset (NLCD), prepared by the United States Geological Survey (USGS) and modeled to create a habitat suitability map. This map output (Appendix I) predicts the probability of occurrence for ABB, based on the suitability of the habitat in the surrounding areas, across the entire ABB range in Oklahoma. The ABB probability for each route is based on the averaged probability across the length of each route, based on this map.

For wetlands estimations, the publicly available National Wetlands Inventory (NWI) map, also maintained by the USFWS, was used. A 50' buffer was created around each inventoried route to simulate the average area of impact for the average transportation project. The reported acreage of wetlands (Appendix I) is the acreage of overlap of NWI mapped wetlands with this buffered region. This acreage did not include freshwater ponds, which are listed on the NWI but are not considered jurisdictional WOTUS.

This information represents general environmental considerations for each route based on the NEPA process and provides guidance for potential environmental resources that are likely to occur on each route. General ecological knowledge of many of these species can further provide guidance on potential impacts and probability of occurrence along routes. The complete species and wetlands report are found in Appendix I.

3.3.4 Other Environmental Impact Considerations

National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment are set by the Environmental Protection Agency (EPA). The six principal pollutants are Carbon Monoxide (CO), Lead (Pb), Nitrogen Dioxide (NO₂), Ozone (O₃), Particulate Matter, and Sulfur Dioxide (SO₂). Kay County falls within an air quality attainment area based on the NAAQS. Local air quality may experience a decline during construction activities based on the use of heavy trucks and generation of dust but would not be expected to have lasting adverse impacts.

Transportation improvement projects are expected to take place during normal working hours. No sensitive light receptors would be present. Increased noise is expected from construction activities, but these disturbances would be minor and limited to the duration of the construction project.

Floodplain management would be considered for each transportation project. Ideally, any road improvement projects would be designed to alleviate the potential for flooding and improve drainage structures.

Environmental Justice ensures that minority and low-income populations and Native American populations receive fair treatment with respect to the environmental impacts. The social and economic characteristics of the Kaw Nation have been discussed in a previous section. This LRTP has been commissioned by the Kaw Nation Transportation Department. Any proposed construction

activities would be tribal endeavors. Transportation network improvements would have beneficial social and economic impacts by providing jobs and improving road conditions and increasing safety.

3.4 Cultural and Historical Resources

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, Federal agencies must consider the effects of projects they carry out, approve, or fund on historic properties. The BIA, as the federal land management agency, is tasked with NHPA compliance. Therefore, prior to the expenditure of TTP or any other federal funds, proposed projects will be reviewed and evaluated for potential impacts to cultural and historical resources. If required, cultural resources surveys will be conducted and the proper agencies consulted.

The Native American Graves Protection and Repatriation Act (NAGPRA) protects cultural items and grave sites on federal or tribal lands. NAGPRA requires agencies that receive federal funding to return Native American cultural items to lineal descendants and culturally affiliated Indian Tribes and Native Hawaiian organizations. NAGPRA establishes procedures for the inadvertent discovery or planned excavation of Native American cultural items on federal or tribal lands.

3.5 Tribal Transportation Improvement Program (TTIP)

The Kaw Nation Roads Department develops the Tribal Transportation Improvement Program (TTIP) to prioritize listings of project to be carried out in five-year periods. The TTIP is completed in accordance with the 25 CFR Part 170.421-220. The approved Kaw Nation 2020 TTIP can be found in Appendix J.

3.6 Transportation Plan (20-Year)

A 20-year transportation plan was developed by the Transportation Director based on review of current TIPs. The Transportation Director created a list a list of potential projects based on research and consultation. The projects on this list are considered a general plan and may be revised, deleted or expanded during the period of the LRTP. The complete analysis of projects and 20-year schedule can be found in Appendix K.

3.7 Project Development

The Kaw Nation Roads Department administers their program through a Tribal Transportation Government to Government Agreement (G2G) with the Bureau of Indian Affairs. A Tribe with a G2G administers its own TTP as authorized by Chapter 2 of Title 23, as amended by: Public Law 114-94, *Fixing America's Surface Transportation Act* (FAST Act); and, Public Law 109-59, *Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users* (SAFETEA-LU). The TTP activities transferred to a Tribe through a G2G may include:

- Transportation Planning
- Construction Management
- Program Administration
- Design
- Construction
- Road Maintenance (25% of TTP funds or \$500,000, whichever is greater)
- Develop Tribal-State Maintenance Agreements
- Other TTP-eligible activities (including TTP Safety and Bridge)

3.8 Funding Resources

The FHWA Office of Planning provides a comprehensive review of Tribal Transportation Funding Resources in cooperation with the Bureau of Indian Affairs, the Tribal Technical Assistance Program, other FHWA offices, and the Federal Transit Administration. The purpose is to assist with transportation planning and to assist with developing a financial profile for each project listed in the Tribal Transportation Improvement Plan. Outside of FHWA, federal funding sources related to planning and development, housing and communities, transit, and safety are available.

Federal Lands Highway Program (administered by the USDOT and US DOI)

The programs listed here are the primary source of funding for Tribal Transportation Programs.

Table 5. Tribal Transportation Program Funding Resources (FLHP)

Funding Program	Purpose	Administering Agency	Federal Share
Emergency Relief – Federal Roads	Assistance for roads to and within federal and Indian lands, damaged by natural disaster or catastrophic failure	USDOT – FHWA	100%
Tribal Transportation Program (TTP)	TTP road and bridge infrastructure planning, maintenance, repair and construction	USDOT – FHWA UDOI – BIA	100%
TTP Maintenance	TTP road system maintenance on both the BIA and larger TTP systems	USDOT – FHWA UDOI – BIA	100%
TTP Bridge	TTP bridge planning, design, engineering, preconstruction, construction, inspection and repair	USDOT – FHWA UDOI – BIA	100%
Park Roads & Parkways	National park road planning, engineering and construction	USDOT - FLH USDOI – NPS / FWS	100%
Public Lands Highways	Indian reservation, national park and public lands roadway, parkway and transit planning, research, engineering and construction	USDOT – FHWA USDOI	100%
Refuge Roads	Maintenance and improvements to National Wildlife Refuge System roads	USDOT – FHWA USDOI - FWS	100%

Federal-Aid Highway Programs (administered by FHWA and NHTSA)

Highway Funds

- CMAQ (Congestion Mitigation – Air Quality)
- Equity Bonus
- Ferry Boat Discretionary
- Highway Bridge
- Highway for LIFE Pilot
- High Priority Project
- National Corridor Infrastructure Improvement
- National Highway System
- National Scenic Byways
- Projects – National/Regional Significance
- TCSP
- Truck Parking Facilities

Flexible Funds

- Surface Transportation Program
- STP – Transportation Enhancements

Non-Motorized Funds

- Recreational Trails

Safety Funds

- Alcohol-Impaired Driving Countermeasures Incentive
- Child Safety – Booster Seat Incentive
- Highway Safety Improvement
- Motorcyclist Safety
- Occupant Protection Incentive
- Safe-Routes-to-School
- Safety Belt Performance
- State-Community Highway Safety

Public Transportation Funding Programs

- Elderly and Persons with Disabilities (5310)
- Rural and Small Urban Areas (5311)
- Job Access and Reverse Commute (5316)
- New Freedom (5317)

Alternative Funding Programs

- Outdoor Recreation, Acquisition, Development and Planning Program
- Rivers, Trails and Conservation Assistance Program

Innovative Project Finance Techniques

- Grant Anticipation Revenue Vehicle
- Public Private Partnerships (PPP)
- State Infrastructure Bank (SIB)

Alternative Resources

Below is a list of some of the funding options applicable for the Tribe.

- U.S. Department of Health & Human Services, Administration for Native Americans (ANA), Social & Economic Development Strategies (SEDS)
 - <https://www.acf.hhs.gov/ana/programs/seds>
- U.S. Department of Health & Human Services, Indian Health Service, Tribal Injury Prevention Cooperative Agreement Program (TIPCAP)
 - <https://www.ihs.gov/injuryprevention/tipcap/>
- U.S. Department of Housing and Urban Development, Office of Native American Programs (ONAP), Indian Community Development Block Grant Program (ICDGB)
 - https://www.hud.gov/program_offices/public_indian_housing/ih/grants/icdbg
- U.S. Department of the Interior, Bureau of Indian Affairs, Indian Highway Safety Program
 - <https://www.bia.gov/bia/ojs/dhs/>

- U.S. Department of the Interior, Bureau of Indian Affairs, Tribal Resilience Program (TRP)
 - <https://www.bia.gov/bia/ots/tribal-resilience-program>
- U.S. Department of Transportation, Office of Federal Lands Highway, Tribal Transportation Safety Funds (TTPSF)
 - <https://flh.fhwa.dot.gov/programs/ttp/safety/ttpsf.htm>
- The U.S. Department of Transportation, BUILD (Better Utilizing Investments to Leverage Development) program
 - <https://www.transportation.gov/BUILDgrants>

Tribal Funds

Tribes may use their own self-generated funds for transportation projects of their choosing. These funds are not federal monies and are therefore not subject to NEPA (National Environmental Policy Act) which requires all federal agencies to prepare documents that assess the potential environmental effects of proposed actions.

Part 4 – Conclusion

This Long Range Transportation Plan was initiated by Mr. Skylar Mathews, Director of the Kaw Nation Transportation/Roads Program, with the purpose of utilizing available TTP funds and to consider the Tribe's transportation development future. The purpose of the plan is to present an overview of the existing transportation network and provide supplemental information for transportation decision-making. The development of this plan will allow the Kaw Nation to move forward with its NTTFI, qualify for TTP funding, and pursue other funding resources. The plan will require regular monitoring of the transportation system and will guide the progress of the tribal transportation program.