

APPENDIX A – Agency Scoping Letters and Responses

The NNSA sent the following scoping letter to the agencies listed below. Responses received are included in this appendix. For ease of review, the duplicate scoping letters were removed (as presented in Appendix A for the Draft EA) and were replaced with the following agency list and an example scoping letter.

Brandon Doster, Unit Chief
Missouri Department of Natural Resources
Federal Facilities Section
Environmental Remediation Program
P.O. Box 176
Jefferson City, Missouri 65102

Tim Eiken, Rules Coordinator
Missouri Department of Natural Resources
Federal Facilities Section
Environmental Remediation Program
P.O. Box 176
Jefferson City, Missouri 65102

Rob Hunt, Planning Coordinator
Missouri Department of Natural Resources
Director's Office
P.O. Box 176
Jefferson City, Missouri 65102

Joe Summerlin, NEPA Reviewer
Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

Wes Minder, Director
KC Water
4800 East 63rd Street
Kansas City, Missouri 64130

Ross Grundyson, Interim Fire Chief
Kansas City Fire Department
Century Towers
635 Woodland Ave
Suite 2100
Kansas City, Missouri 64106

Rodney Baldwin, Fire Chief
Grandview Fire Department
Grandview City Hall
1200 Main Street
Grandview, Missouri 64030



**Department of Energy
National Nuclear Security Administration
Kansas City Field Office**
14520 Botts Road
Kansas City, MO 64147



May 8, 2023

ADDRESSEE

Re: DOE NNSA NEPA Review for the Kansas City National Security Campus (KCNSC)
KC NExT Project

[NAME]:

The U.S. Department of Energy (DOE) National Nuclear Security Administration (NNSA) is evaluating the acquisition and operation of a new facility/campus east of the existing Kansas City National Security Campus (KCNSC) Botts Campus in Kansas City, Jackson County, Missouri (see attached location map).

In the Fall of 2021, KCNSC was tasked to develop a conceptual area layout for a proposed new campus on the 245 acres east of the existing Botts Campus, referred to as KC NExT. The NNSA intends to prepare an Environmental Assessment (EA) to support the acquisition and operation of a new campus on approximately 245 acres immediately east of the Botts Campus. This proposed campus, to be constructed by a private land developer, would provide approximately 440,000 square feet of additional office space and approximately 500,000 square feet of additional manufacturing capacity for KCNSC. NNSA/KCNSC is considering entering into a series of purchase agreements to acquire this development completed by a private land developer. The EA would update the operations and activities conducted at the Botts Campus and at Building 23, as described in the *Environmental Assessment for the Kansas City National Security Campus Sitewide Assessment of Botts and Building 23 Operations (DOE/EA 2167)* completed in July 2021, and update the analysis to account for the private development of the property, account for operations extended to the new campus, and assess the associated effects on the human and natural environment. KCNSC operations would continue at both the existing Botts Campus and Building 23 locations.

The NNSA is beginning the preparation of the EA and has retained Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell) to conduct the environmental review and develop the EA. As this letter initiates the scoping process for the EA, Burns & McDonnell is requesting your assistance in identifying the issues associated with the proposed action as well as any approvals or permits that NNSA may need from your agency to implement the proposed action. The input you provide will be used to determine the types of potential direct and indirect effects the proposed action may have on the public and the environment. Your input will be used by the study team to identify ways to minimize impacts under the following categories:

- Land use
- Air quality and noise
- Geology and soils
- Water resources
- Biological resources
- Socioeconomics (population, employment, growth, development, community services)
- Hazardous materials and waste disposal

- Transportation (roadways, traffic, access, etc.)
- Utilities
- Human health and safety
- Cumulative effects

The NNSA is requesting comments regarding the Proposed Action as it relates to your agency's regulatory jurisdiction or area of expertise. A study area map is attached to this letter indicating the location of the KC NExT project site adjacent to the existing KCNSC Botts Campus and Building 23.

The NNSA would appreciate receiving any comments or information in response to this request no later than 14 days from the date of this letter.

The EA is anticipated to be available for review in late summer 2023. The document will be made available electronically for review and comment.

Please send your comments via email to scannonmackey@burnsmcd.com or by mail to the following address:

Shari Cannon-Mackey, CEP, ENV SP
Burns & McDonnell
6200 Bridge Point Parkway, Suite 400
Austin, Texas 78730

If you have any questions about the project, please contact me at (816) 488-3417 or by email at schandler@kcnsd.doe.gov. Thank you for your time and assistance on the Project.

Sincerely,



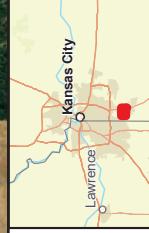
Sybil Chandler, MS, CSP, CHMM
NEPA Compliance Officer
National Nuclear Security Administration
Kansas City Field Office

Enclosure: Study Area Map

CC: Matt McConville, Honeywell
Shari Cannon-Mackey, Burns & McDonnell



Building 23
KCNEXT
KCNSC Botts Campus



Study Area Map
Kansas City
National Security Campus
KC NEXT DOE/NNSA



Source: Burns & McDonnell Engineering

Issued: 4/27/2023

From: [Kruse, Anna](#)
To: [Cannon-Mackey, Shari](#)
Cc: [Ragsdale, Joseph](#)
Subject: EA Information Request/KC NExT Project
Date: Thursday, May 18, 2023 2:21:47 PM
Attachments: [image001.png](#)
[image002.png](#)
[NoRef_DeptEnergy.NNSA_Lettr.wAttach.pdf](#)

Please see attached for the response to your inquiry of May 8, 2023, to Ross Grundyson, Interim Fire Chief, KCFD.

This letter provides information regarding hazardous Materials. Thank you.



Anna Kruse

Administrative Officer
Fire Prevention
Fire Department
City of Kansas City, Mo.
635 Woodland/Ste 2103
Kansas City, MO 64106
Email: anna.kruse@kcmo.org
Phone: 816-513-4645
Fax: 816-513-4689
[KCMO.gov/fire](https://www.kcmo.gov/fire)



Fire Prevention Division

635 Woodland Ave.
Suite 2103
Kansas City, Missouri 6410

Office: (816) 513-4611
Fax: (816) 513-4689

To: Sybil Chandler
Kansas City National
Security Campus
Kansas City, MO

5/18/2023

Subject: Environmental Assessment

A records check was made of the acreage referred to as KC NExT, per attached location map. This search revealed no records found regarding fire department responses for Hazardous Materials releases or other environmental incidents. Thank you.

Thomas Kievlan

Thomas F. Kievlan

Assistant Fire Marshal

Fire Prevention Division

Kansas City Fire Department

City of Kansas City, Mo.

635 Woodland Ave., Ste. 2103

Kansas City, MO 64106

E-mail: tom.kievlan@kcmo.org

Phone: (816) 513-4644

Fax: (816) 513-4689

Cannon-Mackey, Shari

From: Rodney Baldwin <rbaldwin@grandview.org>
Sent: Tuesday, May 30, 2023 2:50 PM
To: Cannon-Mackey, Shari
Subject: RE: DOE NNSA NEPA Review for Kansas City National Security Campus (KCNSC) KC NExT Project

Very good, thank you. The Grandview Fire Department is not aware of any environmental issues or fire code violations on that property.

From: Cannon-Mackey, Shari <scannonmackey@burnsmcd.com>
Sent: Tuesday, May 30, 2023 12:53 PM
To: Rodney Baldwin <rbaldwin@grandview.org>
Subject: RE: DOE NNSA NEPA Review for Kansas City National Security Campus (KCNSC) KC NExT Project

Chief Baldwin –

At this time, the only “address” that can be provided is the “Property located at Northeast Corner of Missouri State Highway No. 150 and Botts Road in Kansas City, Jackson County, Missouri”. I am sure as the project progresses and NNSA-KCNSC plans to occupy the property that they will obtain a 911-compliant street address.

Please let me know if you have further questions or comments.

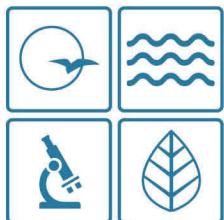
Shari Cannon-Mackey, CEP, ENV SP | Burns & McDonnell
O 737-787-6683 | M 512-750-2475
scannonmackey@burnsmcd.com

From: Rodney Baldwin <rbaldwin@grandview.org>
Sent: Monday, May 15, 2023 10:35 AM
To: Cannon-Mackey, Shari <scannonmackey@burnsmcd.com>
Subject: DOE NNSA NEPA Review for Kansas City National Security Campus (KCNSC) KC NExT Project

Ms. Cannon-Mackey,

The property outlined for development KCNSC NExT project is located in Kansas City as identified by the map provided. The provision of a parcel number or address that is in Grandview will give us the information needed to evaluate any environmental problems identified and issue a report of findings.

Rodney D. Baldwin
Grandview Fire Chief
rbaldwin@grandview.org
Office: (816)316-4962
Cell: (816)401-5942



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Michael L. Parson
Governor

Dru Buntin
Director

June 2, 2023

Shari Cannon-Mackey
Burns & McDonnell
6200 Bridge Point Parkway, Suite 400
Austin, TX 78730

Dear Shari Cannon-Mackey;

The Missouri Department of Natural Resources appreciates the opportunity to review the materials for the KC NExT Project. The Department offers the following comments for consideration.

Project Location

The project location is directly east of the existing Kansas City National Security Campus, Botts Campus in Kansas City, Jackson County, Missouri. It is bordered by Botts Road on the west and Highway 150 on the south. The following geographic descriptions apply to the approximate location of the study area.

Geographic Coordinates:
366488E, 4302589Nw

Public Land Survey System:
T47N R33W S26

8-Digit Hydrologic Unit Code:
Lower Missouri-Crooked (10300101)

Ecological Drainage Unit:
Central Plains/Blackwater/Lamine

Geology and Geospatial Data

If a full Geologic Assessment is required for a project, the Missouri Geological Survey can be contacted directly at 800-361-4827. Most information related to general surface geology, geologic hazards, proximity to hazardous waste sites, and domestic or municipal drinking water sources can be obtained from databases which can be viewed using Geosciences Technical Resource Assessment Tool located at <http://dnr.mo.gov/geostrat>.

Other maps showing natural and cultural resources can be found at <https://dnr.mo.gov/land-geology/maps-data-research>.



Karst Topography

There are zero springs or sinkholes near the project area. The project area is located in the “Belton” quadrangle, which has a cave density of 1. Springs, sinkholes, and caves are features on the landscape associated with karst topography that can act as direct conduits of surface water and pollutants to groundwater. As such, extra precaution should be taken to minimize disturbance of land in or around these features, and to avoid the introduction of pollutants to sensitive groundwater resources. Karst areas may also present the possibility of potential collapse.

Wells

There are 63 abandoned, soil, and other public wells near the project area. Wells can act as conduits of pollutants to groundwater resources. Abandoned wells should be plugged prior to any land disturbance, and care should be taken to utilize appropriate best management practices to protect any currently operating wells. For more information on locating and plugging wells, or on private domestic wells, please visit the link below for the Department’s Wellhead Protection Section webpage or contact the Department’s Geological Survey Program directly.

<https://dnr.mo.gov/water/business-industry-other-entities/permits-certification-engineering-fees/wells-drilling>.

Public Land:

There are no public lands located near the project area. Both terrestrial and aquatic COAs are identified by the Missouri Department of Conservation (MDC) and its conservation partners as priority areas that support and conserve viable populations of wildlife and the ecological systems on which they depend. Designated COAs are located statewide and may consist of a combination of public and private resources. Please contact the MDC at 573-751-4115 for more information.

Water Protection

Best Management Practices

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

Watershed Conditions

Public Drinking Water

The project area is in or around the Jackson Co. PWSD #1. There are no intakes, drinking water wells, or tanks near the project area. Proposed project personnel should be aware of nearby Public Drinking Water Districts. Work associated with any project should take into consideration the protection of surface and groundwater public drinking water supplies, implementing appropriate best management practices as necessary. For additional information regarding source

water protection, please contact Ken Tomlin of the Department's Public Drinking Water Branch at 573-526-0269.

Designated Uses

Water Bodies with Specific Designated Uses

The proposed project area is located in the watershed of the Blue River. Water bodies are assigned specific designated uses according to State of Missouri Water Quality regulations at 10 CSR 20-7.031(2). These waters are protected by numeric water quality criteria outlined in 10 CSR 20-7.031(5) and Table A, as well as general water quality criteria outlined at 10 CSR 20-7.031(4). Designated uses of the Blue River include the following:

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

Water Bodies without Specific Designated Uses

Water bodies that are not assigned specific designated uses are still protected by general water quality criteria outlined at 10 CSR 20-7.031(4), and are subject to the acute toxicity criteria of Tables A and B, as well as whole effluent toxicity conditions.

According to the National Wetlands Inventory <https://www.fws.gov/wetlands/>, there is the likelihood of freshwater wetlands and ponds within the riparian corridors of the Blue River. This project has the potential to impact wetlands, ponds, and the aforementioned tributaries and headwater streams to be impacted, depending on their proximity to land disturbance activities. Project sponsors should avoid such impacts through alternatives analysis before compensatory mitigation is considered. If wetlands, ponds, headwaters, or tributaries are not directly impacted but are near any land disturbance, project sponsors should take care to protect water quality. While these water bodies are not assigned specific designated uses, they are protected by Missouri's general water quality criteria.

Sensitive Waters

There are no known sensitive waters in the project area for the following categories. Cold Water Habitat, Outstanding National Resource Waters, Outstanding State Resource Waters, biocriteria reference locations, losing streams, and 303(d) Impaired and 305(b) Threatened Waters.

Table F, Metropolitan No-Discharge Streams:

The Little Blue River is a Metropolitan No-Discharge Watershed. Project personnel should maintain compliance with 10 CSR 20-7.031(7) for any land disturbance activities that are within a Metropolitan No-Discharge stream's watershed. Discharge to metropolitan no-discharge streams is prohibited, except as specifically permitted at 10 CSR 20-7.031(7). These exceptions include uncontaminated cooling water, permitted stormwater discharges in compliance with permit conditions, and excess wet-weather bypasses not interfering with designated uses.

Waters with Approved Total Maximum Daily Loads:

The Blue River has a TMDL for Chlordane. Impairments should not be made worse by this project's activities. The Department staff may require extra protections when developing permits or certifications in order to comply with total maximum daily load and wasteload allocations. Additional information can be found by contacting the Department's Water Protection Program at 573-526-1446 or by visiting the link below. <https://dnr.mo.gov/water/what-were-doing/water-planning/quality-standards-impaired-waters-total-maximum-daily-loads/tmdls>

Permitting Obligations

Clean Water Act Sections 401 and 404

A 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 may be required for projects that have the potential to discharge fill or dredged material into a jurisdictional water of the United States. More information about these permits can be found at the following links.

<https://www.epa.gov/cwa-404/section-404-permit-program>

<https://dnr.mo.gov/water/business-industry-other-entities/permits-certification-engineering-fees/section-401-water-quality>

If discharge into water has occurred, or will occur, project personnel should immediately contact the appropriate USACE District (link below) and the Department's Operating Permits Section at 573-522-4502 for more information.

<http://www.mvr.usace.army.mil/Portals/48/docs/regulatory/MORegBound.pdf>

Mitigation

An alternatives analysis would need to be submitted prior to any impacts to jurisdictional waters as part of the avoidance and minimization measures that precede mitigating unavoidable impacts. Mitigation for wetlands should be in conformance with the *Missouri Wetland Mitigation Method*, http://www.nwk.usace.army.mil/Portals/29/docs/regulatory/mitigation/2017-11-17_MWMM.pdf while mitigation for streams should be in conformance with *Missouri Stream Mitigation Method*, 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 <https://dnr.mo.gov/water/business-industry-other-entities/permits-certification-engineering-fees/stormwater/construction-land-disturbance>.

Questions regarding permit requirements may be directed to the appropriate Department Regional Office <https://dnr.mo.gov/about-us/division-environmental-quality/regional-office>.

Demolition and Construction Waste Management

Additional information on managing construction and demolition waste can be found at the following link <https://dnr.mo.gov/print/document-search/pub2045>.

Hazardous Waste

The former Richards-Gebaur Air Force Base (RGAFB) is located adjacent to and south of the proposed NExT Project. There are several environmental sites at the former RGAFB and site FT002P, a former fire training area, is one of the closer sites. The Air Force performed a CERCLA Site Investigation on FT002P for Perfluorinated Compounds and published the final report in 2016. A remedial investigation is planned by the Air Force this fall and is scheduled to be finished in 2024. This remedial investigation will determine the nature and extent of contamination and provide a risk assessment. For more information regarding the former RGAFB, please contact Kay Grosinske, Base Realignment and Closure Program Manager of the Air Force Civil Engineer Center at 210-395-8272 or by email at kay.grosinske@us.af.mil.

Additional information on hazardous waste and petroleum tanks can be found at <https://dnr.mo.gov/waste-recycling/long-term-stewardship-lts/environmental-site-tracking-research-tool-e-start>.

During the project, if any underground tanks or contaminated soil is discovered, workers should withdraw to a safe distance and notify the Department's spill line at 573-634-2436.

It is the generator's responsibility to determine if materials generated during construction and demolition are hazardous wastes. Demolition-related waste categories typically include: paint residue (paint chips, paint scrapings, etc.); demolition debris (metal and boards that have been painted with lead-based or other heavy metal-based paint); and scrap metal (metal objects that contain lead or other heavy metals). A hazardous waste determination is not required for materials that will be reused or recycled without additional processing.

Asbestos

Prior to demolition activities, regulated structures must be thoroughly inspected by a Missouri-certified asbestos inspector to determine if any Asbestos Containing Materials are present and a notification made to the Department at least 10 working days prior to demolition. Regulated structures include any building which has been used as a commercial, institutional or industrial building (even if it was historic use), and projects involving two or more residential structures. In addition, this includes but is not limited to the following "non-building" structures: bridges,

pipelines, cooling towers, chimneys, dams, and tunnels. Any asbestos found must be properly managed to prevent release of asbestos fibers.

Solid Waste

Information about solid waste uncovered during construction activities can be found at the following link.

<https://dnr.mo.gov/document-search/managing-solid-waste-encountered-during-excavation-activities-pub2192/pub2192>.

No waste may be buried on-site or at an alternate site, except for clean fill. Clean fill is defined by the Revised Statutes of Missouri as “uncontaminated soil, rock, sand, gravel, concrete, asphaltic concrete, cinder blocks, brick, minimal amounts of wood and metal and inert (non-reactive) solids...for fill, reclamation or other beneficial use.” Clean fill must not contain protruding metals or demolition debris. Although not regulated as waste, placement of clean fill materials may be subject to requirements of the Department’s Water Protection Program if it is placed in contact with surface or subsurface waters of the state, or would otherwise violate water quality standards.

Air Pollution

Dust

Ensure fugitive particulate matter emissions, such as dust, resulting from the project do not remain on surfaces or in the air beyond the property line of origin. 10 CSR 10-6.170 restricts the emission of particulate matter to the ambient air beyond the premises of origin. Additional information on general dust emissions may be found here <https://dnr.mo.gov/print/document-search/pub2200>.

Open Burning

The open burning of refuse and trade waste is restricted according to 10 CSR 10-6.045. Construction, demolition, and trade waste cannot be open burned, except for untreated wood. Brush from land clearing activities may be burned if the burning is conducted outside the city limits and greater than 200 yards from the nearest occupied structure. Additional information on open burning can be found at <https://dnr.mo.gov/print/document-search/pub2047>.

Historic Preservation

Project personnel should check with the Department’s State Historic Preservation Office to determine if a Section 106 Review is needed. Information on the Section 106 Review can be found on the Department’s website at <https://mostateparks.com/page/84371/state-historic-preservation-office>.

Additional Considerations

Floodplain

For information concerning flood plains in Missouri, contact the Missouri State Emergency Management Agency, Floodplain Management and Mitigation Branch, at 573-526-9100 or 2302 Militia Drive, Jefferson City, MO 65101.

Endangered Species

The MDC is responsible for collecting and managing information on the location and status of endangered species in the state. Contact MDC's Endangered Species Coordinator at 573-751-4115 or P.O. Box 180, Jefferson City, MO 65102 for general information.

We appreciate the opportunity to provide comments for the proposed project. If you have any questions or need clarification, please contact me at 573-522-6211.

Sincerely,

A handwritten signature in blue ink that reads "Hannah Humphrey". The signature is written in a cursive, flowing style.

Hannah Humphrey
Deputy Director

HH/man