# Final Environmental Assessment: Expansion and Improvements at Ohio Western Reserve National Cemetery Rittman, Ohio

**U.S. Department of Veterans Affairs**

**Ohio Western Reserve National Cemetery**

**10175 Rawiga Road**

**Rittman, OH 44270**

**July 17, 2015**

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# Executive Summary and Conclusions

In this environmental assessment (EA), the U.S. Department of Veterans Affairs, National Cemetery Administration (NCA) identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with expanding and improving the Ohio Western Reserve National Cemetery. This proposed project would cover approximately 30 acres within the boundary of the Ohio Western Reserve National Cemetery and provide for 10 years of burial operations including casket, columbarium, and in-ground cremation sites; and provide a committal shelter, supporting infrastructure, parking, irrigation, landscaping, visitor amenities, signage, and operational facility improvements.

The ***purpose*** of the Proposed Action is to continue to enable the NCA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs in the Cleveland region for the next 10 years.

The Proposed Action is ***needed*** to meet the NCA's goal of providing eligible Veterans with reasonable access to VA burial options.

Three alternatives are analyzed in this EA:

- The ***Proposed Action*** to expand and improve the Ohio Western Reserve National Cemetery in the northeastern portion of the existing cemetery property, to provide 10 years of burial expansion.
- The ***Alternative Action*** to expand and improve the Ohio Western Reserve National Cemetery in the western portion of the existing cemetery property, to provide 10 years of burial expansion.
- The ***No Action*** alternative to not expand and improve the Ohio Western Reserve National Cemetery, but continue burial operations until the current cemetery capacity is reached and conducting site maintenance activities thereafter.

The following table summarizes the potential environmental impacts of the Proposed Action, Alternative Action, and No Action.

## Table: Summary of Impact Analysis

| Resource / Issue | Proposed Action | Alternative Action | No Action |
|---|---|---|---|
| Meets Purpose of and Need for Action | Yes | Yes | No |
| Aesthetics | Minor temporary impact from presence of heavy equipment and unfinished work during construction. | Minor temporary impact from presence of heavy equipment and unfinished work during construction. | None. |
| Air Quality | Particulate emissions during construction are below the *de minimis* threshold level. Emissions would comply with all permit requirements and regulations. No significant impact. | Particulate emissions during construction are below the *de minimis* threshold level. Emissions would comply with all permit requirements and regulations. No significant impact. | None. |
| Cultural Resources | Outside of the national cemetery itself, the Proposed Action would not directly affect any historic properties. Consistency with NCA design standards for national cemeteries would ensure no adverse effect to the NRHP-eligible national cemetery. | Outside of the national cemetery itself, the Proposed Action would not directly affect any historic properties. Consistency with NCA design standards for national cemeteries would ensure no adverse effect to the NRHP-eligible national cemetery. | None. |
| Geology and Soils | Minor short-term potential for erosion and sedimentation during construction; impacts would be minimized through best management practices and conformance with National Pollutant Discharge Elimination System permit requirements. | Minor short-term potential for erosion and sedimentation during construction; impacts would be minimized through best management practices and conformance with National Pollutant Discharge Elimination System permit requirements. | None. |
| Hydrology and Water Quality | Minor short-term potential for erosion and sedimentation during construction; impacts would be minimized through best management practices and conformance with National Pollutant Discharge Elimination System permit requirements. Groundwater supply well for irrigation water would be sited and operated in consultation with appropriate contractors and regulatory agencies to ensure minimal impacts on existing groundwater users. | Minor short-term potential for erosion and sedimentation during construction; impacts would be minimized through best management practices and conformance with National Pollutant Discharge Elimination System permit requirements. Groundwater supply well for irrigation water would be sited and operated in consultation with appropriate contractors and regulatory agencies to ensure minimal impacts on existing groundwater users. | None. |

| Resource / Issue | Proposed Action | Alternative Action | No Action |
|---|---|---|---|
| Wildlife and Habitat | Not likely to adversely affect protected species; less than significant impact to local general wildlife and habitat. | Not likely to adversely affect protected species; less than significant impact to local general wildlife and habitat | None. |
| Noise | Minor short-term adverse noise impacts during construction. Continued minor, intermittent, long-term adverse noise impacts during operation from ceremonial M-16 rifle salutes and grounds maintenance equipment. | Minor short-term adverse noise impacts during construction. Continued minor, intermittent, long-term adverse noise impacts during operation from ceremonial M-16 rifle salutes and grounds maintenance equipment. | None. |
| Land Use | Minimal impact from pushing back the edge of a wooded area from 20 to 200 feet in some sections of the expansion area. | None. | None. |
| Floodplains, Wetlands, and Coastal Zone Management | No jurisdictional wetlands present. Impacts to isolated wetlands would be minimized by complying with the terms of a Level One Isolated Wetland Permit; no significant impact. | Impacts to wetlands would be minimized through design of the expansion layout and by complying with the terms of any required federal or state permits; no significant impact. | None. |
| Socioeconomics and Environmental Justice | No adverse impact. Possible short-term localized beneficial impact to employment during construction. | No adverse impact. Possible short-term localized beneficial impact to employment during construction. | None |
| Community Services | Continuing beneficial impact by providing burial services for Veterans and their families. | Continuing beneficial impact by providing burial services for Veterans and their families. | Adverse impact after current capacity is reached and Veterans' families must travel long distances for burial and visitation. |
| Solid and Hazardous Materials | Minor increase in solid waste during construction, and continued generation at current levels from operations. No significant impact. | Minor increase in solid waste during construction, and continued generation at current levels from operations. No significant impact. | None. |
| Transportation and Parking | Short-term adverse impact from construction traffic, less than significant. | Short-term adverse impact from construction traffic, less than significant. | None. |
| Utilities | No adverse impacts. | No adverse impacts. | None. |

| Resource / Issue | Proposed Action | Alternative Action | No Action |
|---|---|---|---|
| Potential for Generating Substantial Controversy | None identified. | None identified. | None identified. |

No significant cumulative adverse effects to any resources are anticipated.

Public and agency comments on the Draft EA were considered in preparing the Final EA.

# Table of Contents

Executive Summary and Conclusions ..... i
Table: Summary of Impact Analysis ..... ii

ABSTRACT ..... ix
Acronyms and Abbreviations ..... x
1.0 INTRODUCTION ..... 1
1.1 Purpose and Need for the Proposed Action ..... 4
1.2 Project Background and Existing Site ..... 4
1.3 Decision-Making ..... 4
2.0 ALTERNATIVES ..... 6
2.1 Development of Alternatives ..... 6
2.2 Alternatives ..... 6
2.2.1 Proposed Action: Expansion and Improvement – Northeastern Property Location ..... 6
2.2.2 Alternative Action: Expansion and Improvement – Western Property Location ..... 8
2.2.3 No Action ..... 9
2.3 Alternatives Identified But Not Evaluated in Detail ..... 10
3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES ..... 12
3.1 Aesthetics ..... 12
3.1.1 Existing Environment ..... 12
3.1.2 Environmental Consequences ..... 12
3.1.2.1 Proposed Action ..... 12
3.1.2.2 Alternative Action ..... 13
3.1.2.3 No Action ..... 13
3.2 Air Quality ..... 13
3.2.1 Existing Environment ..... 13
3.2.1.1 Regional Climate ..... 13
3.2.1.2 National Ambient Air Quality Standards ..... 13
3.2.1.3 General Conformity Requirements ..... 15
3.2.1.4 State and Local Air Quality Requirements ..... 15
3.2.1.5 Existing Emissions Sources ..... 16
3.2.1.6 Sensitive Receptors ..... 16
3.2.2 Environmental Consequences ..... 16
3.2.2.1 Proposed Action ..... 16
3.2.2.2 Alternative Action ..... 18
3.2.2.3 No Action ..... 18
3.3 Cultural Resources ..... 18
3.3.1 Existing Environment ..... 19
3.3.2 Environmental Consequences ..... 20
3.3.2.1 Proposed Action ..... 20
3.3.2.2 Alternative Action ..... 20
3.3.2.3 No Action ..... 20
3.4 Geology and Soils ..... 21
3.4.1 Existing Environment ..... 21
3.4.2 Environmental Consequences ..... 23
3.4.2.1 Proposed Action ..... 23
3.4.2.2 Alternative Action ..... 23
3.4.2.3 No Action ..... 24

3.5 Hydrology and Water Quality ..... 24
3.5.1 Existing Environment ..... 24
3.5.2 Environmental Consequences ..... 25
3.5.2.1 Proposed Action ..... 25
3.5.2.2 Alternative Action ..... 26
3.5.2.3 No Action ..... 26
3.6 Wildlife and Habitat ..... 26
3.6.1 Existing Environment ..... 26
3.6.2 Environmental Consequences ..... 28
3.6.2.1 Proposed Action ..... 28
3.6.2.2 Alternative Action ..... 29
3.6.2.3 No Action ..... 29
3.7 Noise ..... 29
3.7.1 Existing Environment ..... 29
3.7.2 Environmental Consequences ..... 33
3.7.2.1 Proposed Action ..... 33
3.7.2.2 Alternative Action ..... 35
3.7.2.3 No Action ..... 35
3.8 Land Use ..... 37
3.8.1 Existing Environment ..... 37
3.8.2 Environmental Consequences ..... 38
3.8.2.1 Proposed Action ..... 38
3.8.2.2 Alternative Action ..... 39
3.8.2.3 No Action ..... 39
3.9 Floodplains, Wetlands, and Coastal Zone Management ..... 39
3.9.1 Existing Environment ..... 39
3.9.2 Environmental Consequences ..... 42
3.9.2.1 Proposed Action ..... 42
3.9.2.2 Alternative Action ..... 42
3.9.2.3 No Action ..... 42
3.10 Socioeconomics and Environmental Justice ..... 43
3.10.1 Existing Environment ..... 43
3.10.2 Environmental Consequences ..... 43
3.10.2.1 Proposed Action ..... 43
3.10.2.2 Alternative Action ..... 43
3.10.2.3 No Action ..... 43
3.11 Community Services ..... 43
3.11.1 Existing Environment ..... 43
3.11.2 Environmental Consequences ..... 44
3.11.2.1 Proposed Action ..... 44
3.11.2.2 Alternative Action ..... 44
3.11.2.3 No Action ..... 44
3.12 Solid Waste and Hazardous Materials ..... 44
3.12.1 Existing Environment ..... 44
3.12.2 Environmental Consequences ..... 45
3.12.2.1 Proposed Action ..... 45
3.12.2.2 Alternative Action ..... 45
3.12.2.3 No Action ..... 45
3.13 Transportation and Parking ..... 45
3.13.1 Existing Environment ..... 45
3.13.2 Environmental Consequences ..... 46

3.13.2.1 Proposed Action ..... 46
3.13.2.2 Alternative Action ..... 46
3.13.2.3 No Action ..... 46
3.14 Utilities ..... 47
3.14.1 Existing Environment ..... 47
3.14.2 Environmental Consequences ..... 47
3.14.2.1 Proposed Action ..... 47
3.14.2.2 Alternative Action ..... 48
3.14.2.3 No Action ..... 48
3.15 Cumulative Impacts ..... 48
3.16 Potential for Generating Substantial Controversy ..... 48
4.0 AGENCY COORDINATION AND PUBLIC INVOLVEMENT ..... 50
4.1 Agency and Tribal Coordination ..... 50
4.2 Public Involvement ..... 51
4.2.1 Scoping ..... 52
4.2.1.1 Scoping Process ..... 52
4.2.1.2 Summary of Scoping Comments ..... 52
4.2.2 Public Review of Draft Environmental Assessment ..... 54
4.2.3 Availability of Final EA and FONSI ..... 55
5.0 BEST MANAGEMENT PRACTICES AND MONITORING ..... 57
*Aesthetics* ..... 57
*Air Quality* ..... 57
*Cultural Resources* ..... 57
*Geology and Soils* ..... 57
*Hydrology and Water Quality* ..... 58
*Wildlife and Habitat* ..... 58
*Noise* ..... 58
*Wetlands* ..... 58
*Solid Waste and Hazardous Materials* ..... 59
*Transportation and Parking* ..... 59
6.0 LIST OF PREPARERS ..... 60
7.0 REFERENCES ..... 61
8.0 GLOSSARY ..... 64

Appendix A: Agency and Tribal Correspondence

Appendix B: Comments on Draft Environmental Assessment

## List of Tables

Table 3-1. Federal and Ohio Ambient Air Quality Standards ..... 14

Table 3-2. Applicable *de minimis* Emission Levels for Nonattainment Areas under General Conformity Rule ..... 15

Table 3-3. Estimate of Annual Particulate Emissions from Construction ..... 17

Table 3-4. Estimate of Annual Non-Road Emissions of Criteria Pollutants ..... 17

Table 3-5. Ohio Western Reserve National Cemetery Soils ..... 22

Table 3-6. Special Status Species in Medina County, Ohio ..... 27

Table 4-1. Agency and Tribal Coordination for Expansion and Improvements at Ohio Western Reserve National Cemetery ..... 50

Table 4-2. Summary of Scoping Comments ..... 52

Table 4-3. Summary of Comments on Draft EA ..... 55

## List of Figures

Figure 1-1. Ohio Western Reserve National Cemetery – General Location Map ..... 2

Figure 1-2. Ohio Western Reserve National Cemetery – Site Boundary ..... 3

Figure 2-1. Proposed Action ..... 7

Figure 2-2. Alternative Action. ..... 9

Figure 2-3. Modified Layout of Proposed Action (Not Evaluated in Detail). ..... 10

Figure 2-4. Modified Layout of Alternative Action (Not Evaluated in Detail). ..... 11

Figure 3-1. Air Emissions Calculations ..... 18

Figure 3-2. Ohio Western Reserve National Cemetery Soil Survey ..... 22

Figure 3-3. Ohio Western Reserve National Cemetery Noise-Sensitive Receptors ..... 31

Figure 3-4. Ohio Western Reserve National Cemetery Sound Level Monitoring Locations ..... 32

Figure 3-5. Estimated M-16 Blank Noise Levels, Proposed Action ..... 34

Figure 3-6. Estimated M-16 Blank Noise Levels, Alternative Action ..... 36

Figure 3-7. Medina County Land Use Designations in Area of Ohio Western Reserve National Cemetery ..... 38

Figure 3-8. Designated Flood Zones ..... 40

Figure 3-9. Surveyed Wetland Boundaries ..... 41

# ABSTRACT

LEAD AGENCY: U.S. Department of Veterans Affairs (VA), National Cemetery Administration (NCA)

COOPERATING AGENCIES: None

TITLE OF PROPOSED ACTION: Expansion and Improvements at Ohio Western Reserve National Cemetery, Rittman, Ohio

AFFECTED JURISDICTION: Medina County, Ohio

POINT OF CONTACT: Mr. Glenn Elliott, Environmental Engineer, VA Project Manager, 425 I Street NW, Room 6W417a, Washington, DC 20001; (202) 632-5879; Glenn.Elliott@va.gov

PROPONENT: NCA

DOCUMENT DESIGNATION: Final Environmental Assessment

This environmental assessment (EA) identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with expanding and improving the Ohio Western Reserve National Cemetery. This proposed project would cover approximately 30 acres within the boundary of the Ohio Western Reserve National Cemetery and provide for 10 years of burial operations including casket, columbarium, and in-ground cremation sites; and provide a committal shelter, supporting infrastructure, parking, irrigation, landscaping, visitor amenities, signage, and operational facility improvements.

The purpose of the Proposed Action is to continue to enable the NCA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs in the Cleveland region for the next 10 years. The Proposed Action is needed to meet the NCA's goal of providing eligible Veterans with reasonable access to VA burial options.

This EA concludes that no significant impacts would be associated with the Proposed Action.

# Acronyms and Abbreviations

| | |
|---|---|
| ASEL | A-weighted sound exposure level |
| BMP | best management practice |
| CEQ | Council on Environmental Quality |
| CFR | Code of Federal Regulations |
| dBA | A-weighted decibel |
| EA | environmental assessment |
| EIS | environmental impact statement |
| FEMA | Federal Emergency Management Agency |
| FONSI | finding of no significant impact |
| FWS | U.S. Fish and Wildlife Service |
| $L_{MAX}$ | A-weighted maximum sound level |
| NAAQS | National Ambient Air Quality Standards |
| NCA | National Cemetery Administration |
| NEPA | *National Environmental Policy Act* |
| NOA | notice of availability |
| NOACA | Northeast Ohio Area-wide Coordinating Agency |
| NPDES | National Pollutant Discharge Elimination System |
| NRCS | Natural Resources Conservation Service |
| NRHP | National Register of Historic Places |
| OAC | Ohio Administrative Code |
| PM | particulate matter; $PM_{2.5}$ and $PM_{10}$ have average diameter less than 2.5 and 10 micrometers, respectively |
| SHPO | state historic preservation office |
| SIP | state implementation plan |
| $SO_2$ | sulfur dioxide |
| USACE | U.S. Army Corps of Engineers |
| VA | U.S. Department of Veterans Affairs |
| VOC | volatile organic compound |

# 1.0 INTRODUCTION

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) honors Veterans and their families with final resting places in national shrines and with lasting tributes that commemorate their service and sacrifice to the nation. NCA maintains approximately 3.3 million gravesites at 131 national cemeteries, one national Veterans' burial ground, and 33 soldiers' lots and monument sites in 40 states and Puerto Rico (VA 2014a). VA's Office of Construction and Facility Management's mission is to advance VA's mission in support of the nation's Veterans by planning, designing, constructing, and acquiring major facilities; and setting design and construction standards.

In 1992, NCA developed an environmental impact statement (EIS) for the construction and operation of a new national cemetery in Rittman, Ohio. The cemetery is formally known as Ohio Western Reserve National Cemetery. The cemetery sits on 273 acres and is located approximately 50 miles south of downtown Cleveland, Ohio. Figures 1-1 and 1-2 depict the general location and site boundary of the Ohio Western Reserve National Cemetery.

In this environmental assessment (EA), VA identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with expanding and improving the Ohio Western Reserve National Cemetery. This proposed project would cover approximately 30 acres within the boundary of the Ohio Western Reserve National Cemetery and provide for 10 years of burial operations including casket, columbarium, and in-ground cremation sites; and provide a committal shelter, supporting infrastructure, parking, irrigation, landscaping, visitor amenities, signage, and operational facility improvements.

Three alternatives are analyzed in this EA:

- VA's ***Proposed Action*** to expand and improve the Ohio Western Reserve National Cemetery in the northeastern portion of the existing cemetery property, to provide 10 years of burial expansion.
- VA's ***Alternative Action*** to expand and improve the Ohio Western Reserve National Cemetery in the western portion of the existing cemetery property, to provide 10 years of burial expansion.
- The ***No Action*** alternative to not expand and improve the Ohio Western Reserve National Cemetery, but continue burial operations until the current cemetery capacity is reached and conducting site maintenance activities thereafter.

This site-specific analysis is conducted in accordance with the *National Environmental Policy Act* of 1969 (NEPA) (42 United States Code 4321 et seq.), the White House Council on Environmental Quality (CEQ) "Regulations Implementing the Procedural Provisions of NEPA" (40 Code of Federal Regulations [CFR] 1500–1508), VA's NEPA regulations titled "Environmental Effects of the Department of Veterans Affairs Actions" (38 CFR Part 26), and VA's *NEPA Interim Guidance for Projects* (VA 2010). These requirements specify that VA must evaluate the potential environmental impacts of VA facilities, operations, and related funding decisions prior to taking action. VA must apply the NEPA review process and use the information to make an informed decision prior to undertaking a proposed action. An EA provides sufficient evidence and analysis for determining whether an action would cause significant environmental impacts (requiring an EIS) or the agency can issue a finding of no significant impact (FONSI) (40 CFR 1508.9). A FONSI is a decision document that briefly presents the reasons why an action would not have a significant effect on the human environment (40 CFR 1508.13). As required by NEPA and the implementing regulations from CEQ and VA, the alternative of taking no action is evaluated, providing a baseline for comparison of potential impacts from the action alternative(s).

## Figure 1-1. Ohio Western Reserve National Cemetery – General Location Map

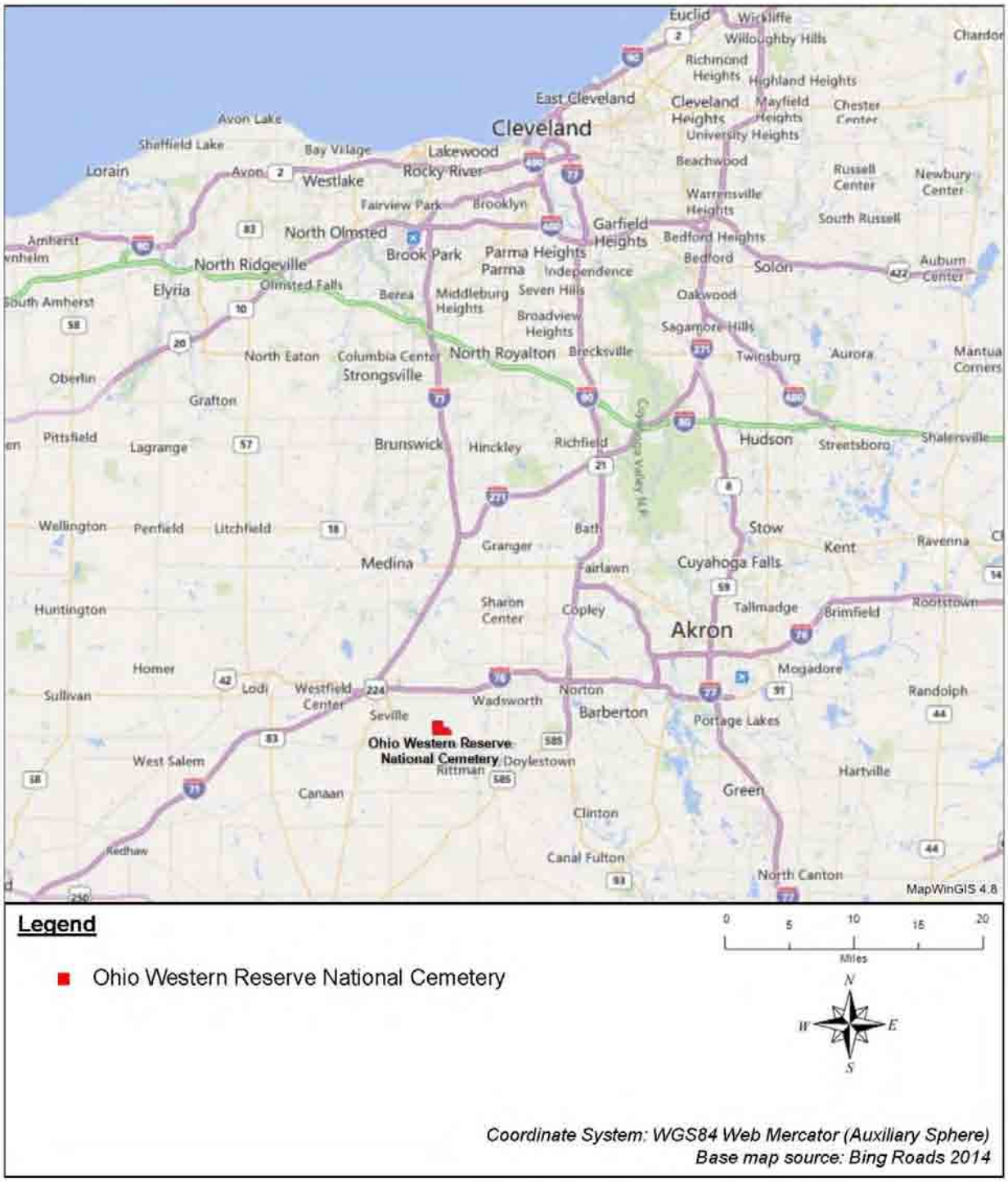


**Figure 1-2. Ohio Western Reserve National Cemetery – Site Boundary**

This EA presents the purpose of and need for the Proposed Action and the project background (Chapter 1), provides details of the alternatives (Chapter 2), and describes the affected environment and evaluates the potential environmental consequences (Chapter 3). The remainder of the document provides a summary of agency coordination and public involvement (Chapter 4), best management practices and monitoring (Chapter 5), a list of preparers (Chapter 6), references (Chapter 7), and a glossary (Chapter 8).

## 1.1 Purpose and Need for the Proposed Action

The ***purpose*** of the Proposed Action is to continue to enable the NCA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs in the Cleveland region for the next 10 years.

The Proposed Action is ***needed*** to meet the NCA's goal of providing eligible Veterans with reasonable access to VA burial options.

## 1.2 Project Background and Existing Site

In October 1992, VA finalized the *Environmental Impact Statement for a National Cemetery to Serve the Cleveland Area*, which evaluated the beneficial and adverse effects of creating a new national cemetery in north-central Ohio (VA 1992). The EIS identified the site now known as the Ohio Western Reserve National Cemetery as the environmentally preferred alternative, and the subsequent Record of Decision documented VA's determination to construct and operate the cemetery at this location. As a result, the property was acquired, initial construction was completed, and cemetery operations commenced in June 2000.

The Ohio Western Reserve National Cemetery is located in Medina County, Ohio, approximately 50 miles south of Cleveland, Ohio. The cemetery property is located within the Rittman city limits and occupies approximately 273 acres, of which approximately 65 acres are currently utilized for burials and related operations. The remainder of the property consists of a heavily wooded area along Tommy Run (which bisects the property from north to south), an area of leased farmland, and areas of native vegetation (consisting of grasses and low shrubs) where some excavated soils are relocated.

On average, the cemetery performs 10 burials per day, with a greater number of burials performed on Mondays and Fridays. Approximately 60 percent of the burials are for Veterans and are accompanied by a three- to five-gun salute; the remaining 40 percent of burials are for Veterans' relatives. As of November 19, 2014, 26,352 interments have been completed.

## 1.3 Decision-Making

This EA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic effects associated with VA's proposed expansion and improvements to the Ohio Western Reserve National Cemetery in Rittman, Ohio. The analysis presented within this EA tiers to and updates the analyses and findings of VA's 1992 EIS for the initial siting, construction, and operation of the national cemetery (VA 1992).

VA, as a federal agency, is required to incorporate environmental considerations into its decision-making process for the actions it proposes to undertake. This is done in accordance with the regulations and guidance identified in Section 1.0. This EA:

- informs the public of the possible environmental impacts of the Proposed Action and its considered alternatives, as well as methods to reduce these effects
- provides for public, state, inter-agency, and tribal input into VA's planning and evaluation
- documents the NEPA process
- supports informed decision-making by the federal government

The decision document for this proposed federal undertaking also identifies the actions to which VA would commit to minimize environmental effects, as required under NEPA, its implementing regulations from CEQ (40 CFR 1500–1508) and VA (38 CFR Part 26), and VA's NEPA guidance (VA 2010).

The decision to be made is whether—having considered the potential physical, environmental, cultural, and socioeconomic effects—VA should implement the Proposed Action including, as appropriate, measures to reduce adverse effects.

# 2.0 ALTERNATIVES

This chapter provides information on the Proposed Action, the Alternative Action, and No Action, as well as design alternatives that were identified but not considered in detail. NEPA, and the regulations of CEQ and VA for implementing NEPA, require all reasonable alternatives to be rigorously explored and objectively evaluated.

## 2.1 Development of Alternatives

The expansion areas evaluated under the Proposed Action and the Alternative Action are both within the boundary of the original cemetery site that was evaluated in the 1992 EIS. Working with an architecture-engineering consultant, NCA considered options within each of the potential expansion areas for layout of the site elements, identifying a concept for each alternative that efficiently developed the available area and complemented the existing cemetery aesthetics.

## 2.2 Alternatives

The alternatives evaluated in this EA are the Proposed Action, the Alternative Action, and No Action. The No Action alternative serves as the baseline for identifying the impacts from the Proposed Action and Alternative Action.

### 2.2.1 Proposed Action: Expansion and Improvement – Northeastern Property Location

Under the Proposed Action, the Ohio Western Reserve National Cemetery would be expanded and improved to extend burial operations on an additional 30 acres of the cemetery property providing for 10 more years of burial expansion. The majority of new development would occur in the northeastern portion of the existing cemetery property. The proposed expansion and improvements include the following:

- Columbarium – A columbarium would be constructed (8,300 capacity). Each of its four sections would be 4 to 5 niches high (approximately 7 to 8 feet high). The columbarium would be located in the eastern portion of the project area.
- Crypt – Eight crypt sections would be constructed (10,906 capacity). The crypt sections would be located immediately northeast of Flag Boulevard.
- Garden Niche – Three garden niche sections would be constructed (4,980 capacity). The garden niche sections would be located in the northeastern portion of the project area.
- Committal Shelter – One committal shelter would be constructed in the northeastern portion of the project area. The committal shelter would be similar to the two existing shelters at the cemetery. The committal shelter would be served by electric utilities to provide lighting and small electric heating capabilities inside the structure. Telephone communications would also be installed. A scoping comment for this EA included a request that NCA consider at least partial enclosure of the committal shelters to protect families from cold or windy conditions during a service. NCA committed to discuss this with the VA design team during detailed project design. A final determination on this would not affect the potential for significant environmental impacts from the Proposed Action or alternatives.
- Roadways and Parking – New roadways and bump-out parking areas would be constructed in the expansion project area. Existing roadways requiring remediation would be improved. Cemetery and cortege lane entrance roadways would be realigned in the vicinity of the Public Information

Center. A temporary construction access road would be constructed near the northern property boundary to minimize traffic impacts to ongoing cemetery operations. Signage would be placed throughout the expansion project area as appropriate.

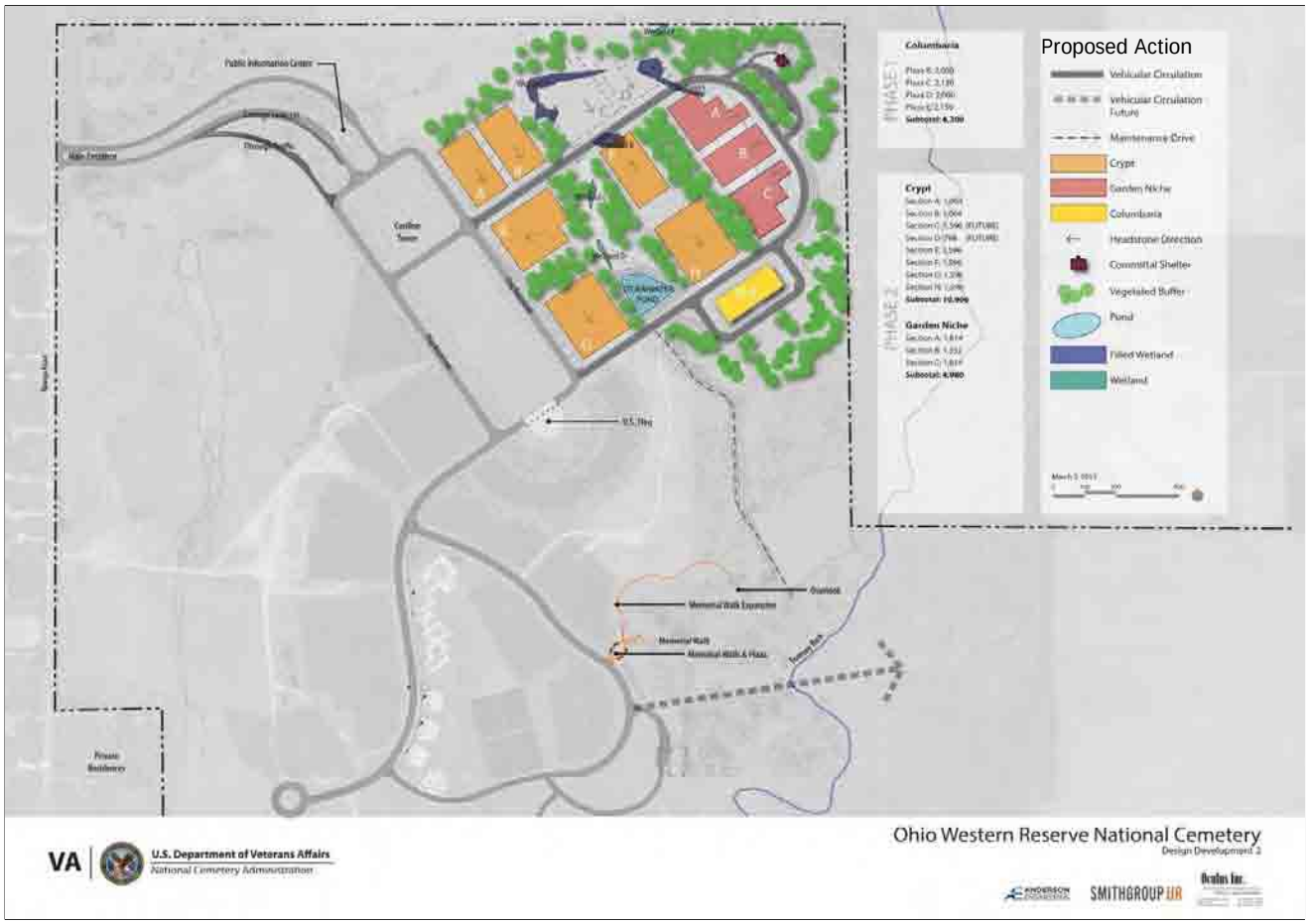
- Landscaping – The expansion area would be landscaped in keeping with the overall cemetery appearance, for visual aesthetics and to provide a sound barrier. Landscape irrigation would be provided from a new groundwater supply well that would be part of the site improvements.

In comments on the Draft EA, the City of Rittman cited Section 961.05 of the *Codified Ordinances of the City of Rittman, Ohio* as banning NCA's potential installation of groundwater wells. Pursuant to the U.S. Constitution, VA as a federal agency is typically not subject to state and local laws, regulations, and requirements unless there is a waiver of sovereign immunity by Congress. NCA has determined there is no applicable waiver of sovereign immunity and the agency is not required to comply with this ordinance. Thus, NCA retains the possibility of developing a groundwater supply well for irrigation as part of the Proposed Action evaluated in this EA.

A scoping comment asked whether NCA would consider selling timber from any trees removed to offset construction costs; this activity is not anticipated due to the administrative requirements related to the federal government selling property compared to the very limited amount of trees that would be removed by selective clearing.

Figure 2-1 depicts the conceptual layout of the Proposed Action.

**Figure 2-1. Proposed Action**



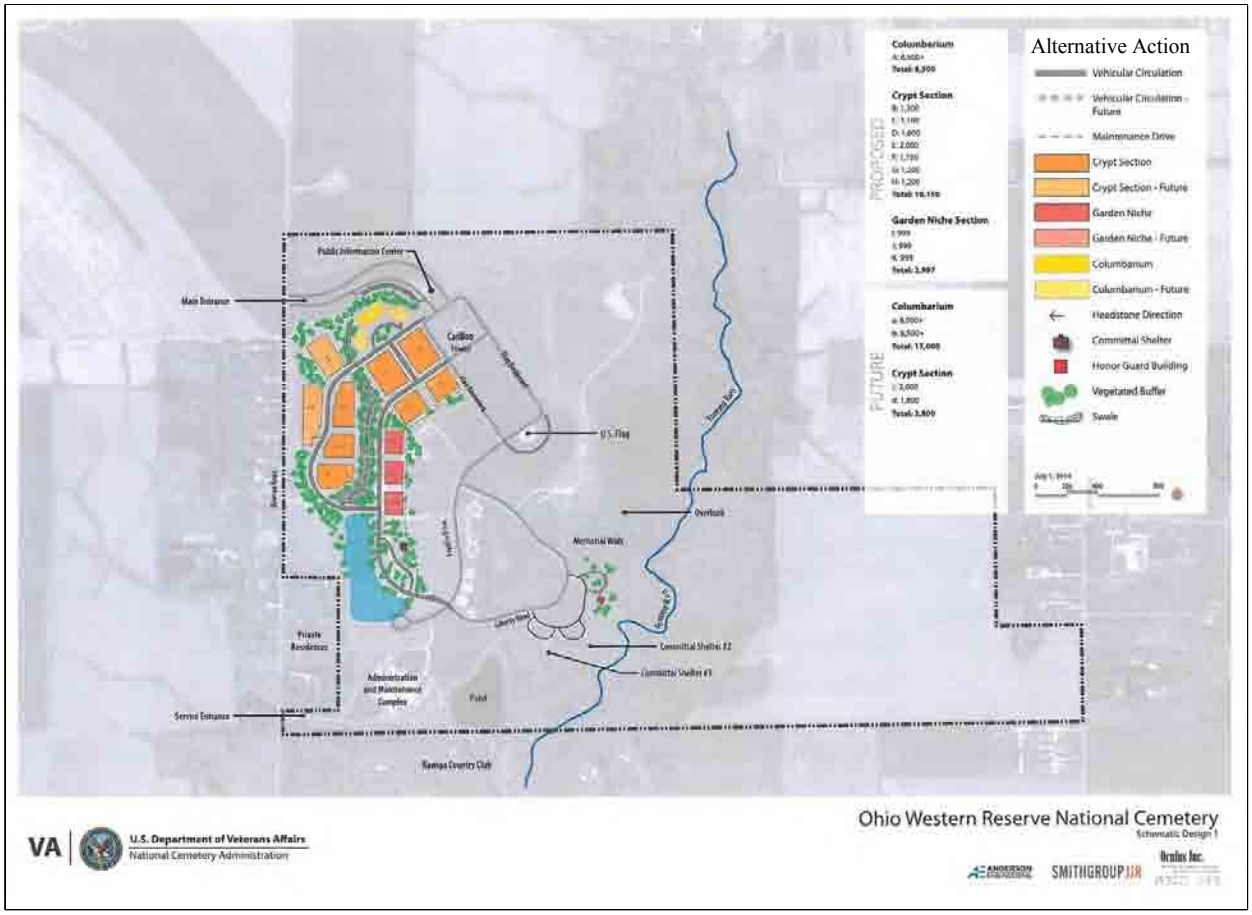
### 2.2.2 Alternative Action: Expansion and Improvement – Western Property Location

Under the alternative action, the Ohio Western Reserve National Cemetery would be expanded and improved to extend burial operations on an additional 30 acres of the cemetery property providing for 10 more years of burial expansion for all burial options. The majority of new development would occur in the western portion of the existing cemetery property. The proposed expansion and improvements include the following:

- Columbarium – A columbarium would be constructed (25,500 capacity). Each of its three sections would be 4 to 5 niches high (approximately 7 to 8 feet high). The columbarium would be located in the northwestern portion of the project area, near the main entrance.
- Crypt – Eight crypt sections would be constructed (13,750 capacity). The crypt sections would be located southwest of Flag Boulevard to the cemetery's western boundary.
- Garden Niche – Three garden niche sections would be constructed (2,997 capacity). The garden niche sections would be located between the crypt sections and the existing cemetery area in the southeastern portion of the project area.
- Committal Shelter – One committal shelter would be constructed in the southern portion of the project area. The committal shelter would be constructed similarly to the two existing shelters. The committal shelter would be served by electric utilities to provide lighting and small electric heating capabilities inside the structure. Telephone communications would also be installed.
- Roadways and Parking – New roadways and bump-out parking areas would be constructed in the expansion project area. Existing roadways requiring remediation would be improved. Cemetery and cortege lane entrance roadways would be realigned in the vicinity of the Public Information Center. A temporary construction access road would be constructed at the western property boundary to minimize traffic impacts to ongoing cemetery operations. Signage would be placed throughout the expansion project area as appropriate.
- Landscaping – The expansion area would be landscaped in keeping with the overall cemetery appearance, for visual aesthetics and to provide a sound barrier. Landscape irrigation would be provided from a new groundwater supply well that would be part of the site improvements.

Figure 2-2 depicts the conceptual layout of the Alternative Action.

**Figure 2-2. Alternative Action.**




## 2.2.3 No Action

The No Action alternative serves as a benchmark against which the effects of the Proposed Action and the Alternative Action can be evaluated. For this project, No Action is defined as not expanding and improving the Ohio Western Reserve National Cemetery, but continuing burial operations until the current cemetery capacity is reached and conducting site maintenance activities thereafter.

The No Action alternative would challenge NCA's goal of providing eligible Veterans with reasonable access to VA burial options in the Cleveland area and, therefore, would not meet the purpose of and need for action. Veterans and their families residing in northern Ohio would be underserved in the future; in many cases, this would require Veterans and their families to travel farther to another available national cemetery or to use a private cemetery. The distribution of national cemeteries in the region would be unequal, and VA would not be in compliance with the requirements of the *Service Members Civil Relief Act*. Furthermore, the No Action alternative would create a hardship for the survivors attending the funerals and for grave visitations of deceased veterans interred in other national cemeteries, because of the distances between homes and the burial sites. If Veterans and their families must resort to private burials, they are deprived of the honor and privilege bestowed upon them by a grateful nation for their service to their country.

## 2.3 Alternatives Identified But Not Evaluated in Detail

Two modified site layouts were identified but not evaluated in detail.

A modified layout of the Proposed Action would relocate some burial areas and swap the locations of the columbarium and the committal shelter (Figure 2-3). In this alternative, 850 fewer crypts would be included, offering less burial capacity. This alternative layout was within the same footprint as the Proposed Action, and the project area of impact would be the same.

A modified layout of the Alternative Action would relocate some burial areas and locate the columbarium along the western property boundary (Figure 2-4). This alternative includes 1,450 fewer crypts and 2,997 more garden niches than the Alternative Action. This alternative layout was within the same footprint as the Alternative Action, and the project area of impact would be the same.

**Figure 2-3. Modified Layout of Proposed Action (Not Evaluated in Detail).**

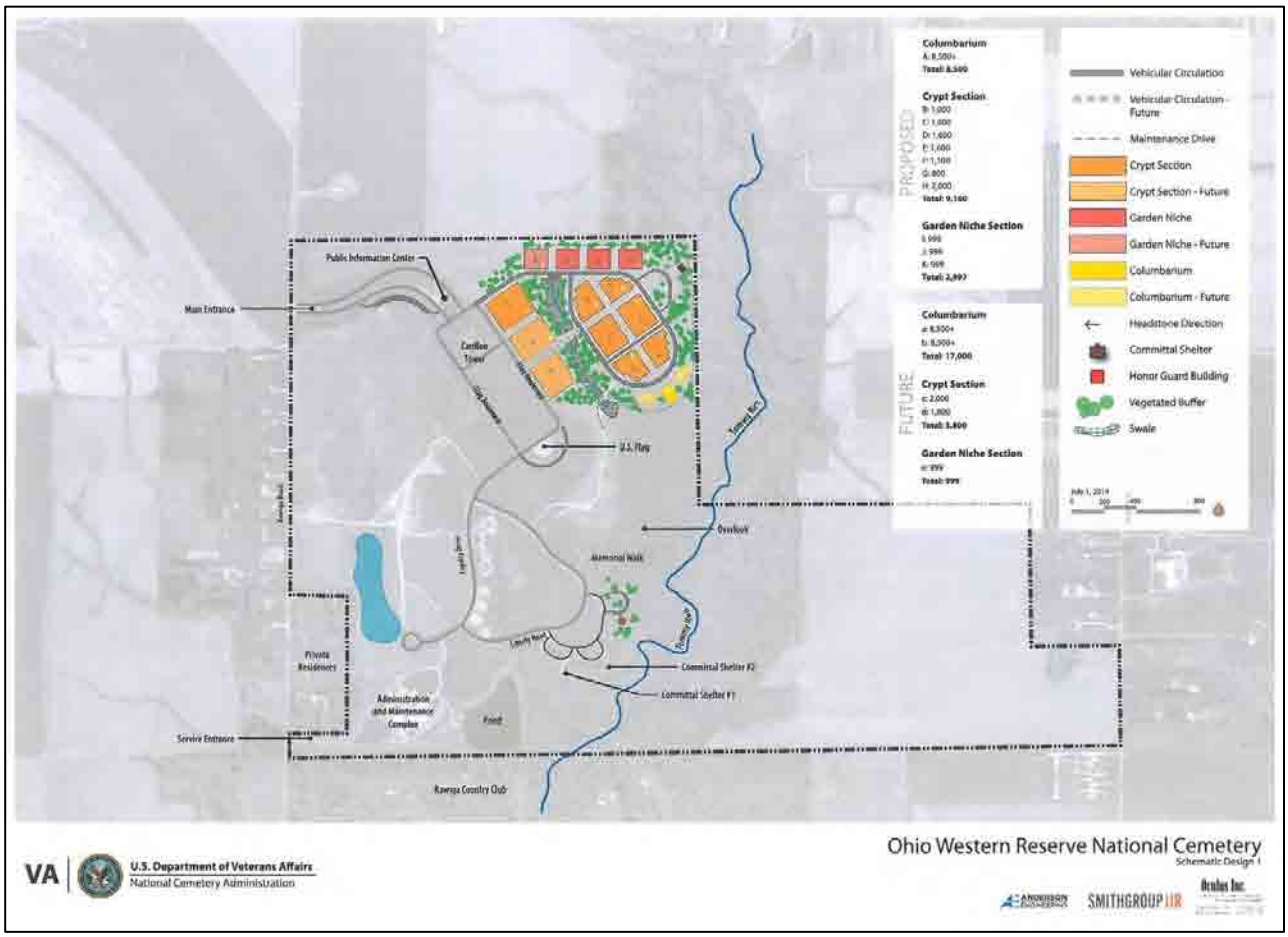
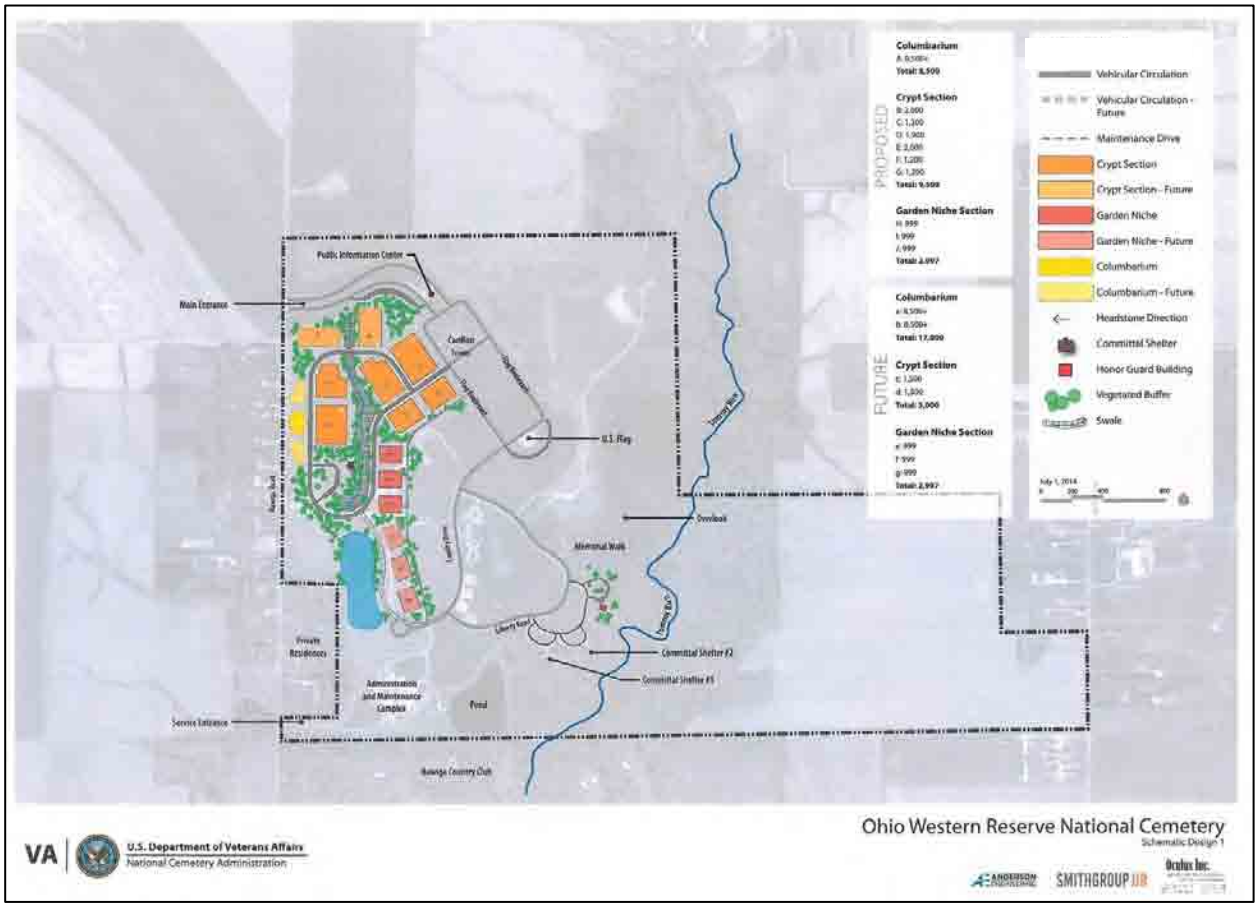


**Figure 2-4. Modified Layout of Alternative Action (Not Evaluated in Detail).**



# 3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

## 3.1 Aesthetics

### 3.1.1 Existing Environment

The project site consists of undeveloped land within the existing property boundary of the Ohio Western Reserve National Cemetery, in a mostly rural area with gently rolling terrain. Features surrounding the cemetery that contribute to the visual character and scenic quality of the area are approximately 58 residences, the public Rawiga Golf and Swim Club, agricultural fields, pasture, and undeveloped land. Overhead transmission wires run along the two-lane Rawiga Road, which forms the western border of the cemetery property.

The project site is visible to drivers on Rawiga Road, to the residences across Rawiga Road, and with varying visibility based on the density of trees from the wooded western fence line areas of the properties on the eastern cemetery border. A scoping comment noted that the vegetated berm along much of the cemetery's boundary on Rawiga Road has not been well-managed. The cemetery has just obtained equipment that will ensure they are able to mow this area on at least a monthly basis beginning in spring of 2015. Another commenter offered the opinion that the berm itself was not visually desirable, and obstructs the outside view of the manicured cemetery grounds; however, NCA has no current plan to remove the berm.

Sources of nighttime light at the cemetery are a spot light on the flagpole and security lights for the cemetery administration building. Nearby residences have minimal outdoor lights.

There are no designated wild and scenic rivers or scenic roadways in the project vicinity.

### 3.1.2 Environmental Consequences

#### *3.1.2.1 Proposed Action*

With the exception of minor improvements to existing roadways, most construction activity would occur within an area of the cemetery that is currently undeveloped but highly disturbed due to initial cemetery development. Heavy equipment would be used for grading and crypt placement and for the initial stages of building the structures and columbarium. The heavy equipment phase of construction is expected to require no more than a total of approximately 60 days and would not necessarily be one continuous period. The presence of heavy equipment and unfinished stages of site preparation and construction would temporarily impact the visual quality of the area for visitors to the cemetery. However, the construction area would be spatially separate from the previously developed cemetery sections and activities would be conducted with sensitivity for interment services.

The appearance of the project site would change from unmanaged vegetation—tall grasses with scattered shrubs and trees—to a manicured cemetery landscape. The cemetery landscape would be in harmony with the adjacent developed areas of the cemetery. All structures (columbaria, crypts, garden niches, committal shelter) would have the same character as the existing structures. The expansion area is minimally visible from Rawiga Road, if at all. The perception of the changes to the view for visitors within the cemetery would likely be neutral or positive, as they would contribute to the solemnity and tranquility of the property, as well as display the expected consistent appearance of Ohio Western Reserve with other national cemeteries. No new nighttime lighting is proposed.

#### *3.1.2.2 Alternative Action*

No adverse impacts to aesthetics or visual character are expected from the Alternative Action.

Effects would be similar to those identified for the Proposed Action, except that the construction activity and changed visual character would have greater visibility than the proposed action from outside the cemetery boundary along Rawiga Road. Because the construction activities would be temporary and the site appearance would be likely experienced as a neutral or positive change, the changed aesthetics from offsite viewpoints are not considered to be adverse impacts.

#### *3.1.2.3 No Action*

No changes to the cemetery's visual character would occur from No Action. Therefore, there would be no impacts to aesthetics.

## 3.2 Air Quality

### 3.2.1 Existing Environment

#### *3.2.1.1 Regional Climate*

Weather and climate are important influences on air resources. The Ohio Western Reserve National Cemetery is located in Medina County approximately 50 miles south of Lake Erie at an elevation of 1,132 feet. According to the Koppen climate system, the climate of Medina County is classified as humid-continental with warm summers (VA 1992, NWS 2014). Summers are warm and humid and winters are cold and cloudy. May is the wettest month and January is the driest. Climate data from the Akron Fulton International Airport, 24 miles from the cemetery, show that average temperatures are between 19.5 and 33.9 degrees Fahrenheit in January and 58.1and 87.1 degrees in July. The average annual precipitation is 37.08 inches (NCDC 2014).

#### *3.2.1.2 National Ambient Air Quality Standards*

The National Ambient Air Quality Standards (NAAQS) (Table 3-1), established by the U.S. Environmental Protection Agency (EPA) and adopted by the Ohio Environmental Protection Agency (Ohio EPA) Division of Air Pollution Control (Ohio Administrative Code [OAC] 3745-25-02), define the maximum allowable concentrations of pollutants that may be reached but not exceeded within a given time period to protect human health with a reasonable margin of safety. The ambient standards are for the criteria pollutants of carbon monoxide, nitrogen dioxide, ozone, lead, particulate matter (PM), and sulfur dioxide ($SO_2$). Particulate matter is further defined by size – less than 10 micrometers in diameter ($PM_{10}$) and less than 2.5 micrometers in diameter ($PM_{2.5}$). While ozone is a regulated pollutant, it is not emitted directly from sources but is formed by a combination of nitrogen oxides and volatile organic compounds (VOCs) reacting with sunlight in the atmosphere. Exceeding any of the NAAQS constitutes nonattainment of the standard in the area. A federally enforceable state implementation plan (SIP) is required for areas of nonattainment, and an EPA-approved maintenance plan is required when an area is reclassified from nonattainment to attainment.

The Ohio Western Reserve National Cemetery, located in Medina County, is within the Greater Metropolitan Cleveland Intrastate Air Quality Control Region (40 CFR 81.22), which is currently in nonattainment for three NAAQS (EPA 2014a):

- EPA designated the area as nonattainment for the 2008 lead standard on November 22, 2010. As required by the *Clean Air Act* Amendments, Ohio EPA submitted two SIPs for attainment of the

### Table 3-1. Federal and Ohio Ambient Air Quality Standards

| Pollutant | Primary/ Secondary | Averaging Time | Level | Form |
|---|---|---|---|---|
| Carbon monoxide | primary | 8-hour | 9 ppm | Not to be exceeded more than once per year |
| | | 1-hour | 35 ppm | Not to be exceeded more than once per year |
| Lead | primary and secondary | rolling 3-month average | 0.15 µg/m$^3$ [1] | Not to be exceeded |
| Nitrogen dioxide | primary and secondary | 1-hour | 100 ppb | 98th percentile of 1-hour daily maximum concentrations, averaged over 3 years |
| | | annual | 53 ppb [2] | Annual mean |
| Ozone | primary and secondary | 8-hour | 0.075 ppm [3] | Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years |
| $PM_{2.5}$ | primary | annual | 12 µg/m$^3$ | Annual mean, averaged over 3 years |
| | secondary | annual | 12 µg/m$^3$ | Annual mean, averaged over 3 years |
| | primary and secondary | 24-hour | 35 µg/m$^3$ | 98th percentile, averaged over 3 years |
| $PM_{10}$ | primary and secondary | 24-hour | 150 µg/m$^3$ | Not to be exceeded more than once per year on average over 3 years |
| Sulfur dioxide | primary | 1-hour | 75 ppb [4] | 99th percentile of 1-hour daily maximum concentrations, averaged over 3 years |
| | secondary | 2-hour | 0.5 ppm | Not to be exceeded more than once per year |

Sources: 40 CFR 50, OAC 3745-25-02

[1] Final rule signed October 15, 2008. The 1978 lead standard (1.5 µg/m$^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the previous standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[2] The official level of the annual nitrogen dioxide standard is 0.053 ppm, equal to 53 ppb, which is shown here for the purpose of clearer comparison to the 1-hour standard.

[3] Final rule signed March 12, 2008. The 1997 ozone standard (0.08 ppm, annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years) and related implementation rules remain in place. In 1997, EPA revoked the 1-hour ozone standard (0.12 ppm, not to be exceeded more than once per year) in all areas, although some areas have continued obligations under that standard ("anti-backsliding"). The 1-hour ozone standard is attained when the expected number of days per calendar year with maximum hourly average concentrations above 0.12 ppm is less than or equal to 1.

[4] Final rule signed June 2, 2010. The 1971 annual and 24-hour $SO_2$ standards were revoked in that same rulemaking. However, these standards remain in effect until one year after an area is designated for the 2010 standard, except in areas designated nonattainment for the 1971 standards, where the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standard are approved.

ppb = parts per billion; ppm = parts per million; µg/m$^3$ = micrograms per cubic meter

lead standard. These SIPs address partial nonattainment areas within Fulton and Cuyahoga County and specific point sources for lead emissions (Ohio EPA 2012a, 2012b). While the air quality control region is considered in nonattainment for lead, Medina County is in attainment (EPA 2014b) and is not included in either lead SIP.

- On August 5, 2013, EPA designated the area as nonattainment for the 2010 $SO_2$ standard. A SIP for the 2010 $SO_2$ standard is not yet developed, but is required by April 2015 (78 Federal Register 47191, August 5, 2013).
- The Greater Metropolitan Cleveland Intrastate Air Quality Control Region is designated as a marginal nonattainment area for the 2008 primary and secondary 8-hour ozone standard (EPA 2014a). On the county level, monitoring data show Medina County to be in marginal nonattainment (EPA 2014b). The Ohio EPA submitted a SIP for the 2008 8-hour ozone standard in July 2014. The SIP addresses VOC and nitrogen oxide emissions within the air quality control region, including Medina County (Ohio EPA 2014a).

#### *3.2.1.3 General Conformity Requirements*

General conformity requirements (EPA 2014c) apply to all federal actions to ensure that:

- federal activities do not cause or contribute to new violation of a NAAQS
- actions do not cause additional or worsen existing violations of the NAAQS, or contribute to new violations
- attainment of the NAAQSs is not delayed

The implementing regulations for the general conformity rule establish *de minimis* thresholds for criteria pollutants and precursors (40 CFR 93 Subpart B). A "conformity determination" is required for each criteria pollutant or precursor where the total of direct and indirect emissions of the criteria pollutant or precursor in a nonattainment or maintenance area caused by a federal action would equal or exceed any of the *de minimis* thresholds (40 CFR 93.153(b)). Table 3-2 lists the *de minimis* emissions levels for the nonattainment areas that are applicable to the Greater Metropolitan Cleveland Intrastate Air Quality Control Region

**Table 3-2. Applicable *de minimis* Emission Levels for Nonattainment Areas under General Conformity Rule**

| Area Designation | Pollutant | Precursor | *de minimis* level (tons/year) |
|---|---|---|---|
| All $SO_2$ nonattainment areas | $SO_2$ | none | 100 |
| All lead nonattainment areas | lead | none | 25 |
| Ozone nonattainment areas outside an ozone transport region other than one designated as Serious, Severe, or Extreme | ozone | VOC or nitrogen oxides | 100 |

#### *3.2.1.4 State and Local Air Quality Requirements*

State-wide air compliance and enforcement activities are coordinated by the Ohio EPA, Division of Air Pollution Control. The Ohio Administrative Code for air quality requires reasonably available control

measures to prevent fugitive dust from becoming airborne during construction and demolition. Control measures generally include water or chemical dust suppression (OAC 3745-17-08).

City and county-level air quality requirements fall under two entities. First, the Akron Regional Air Quality Management District is a local affiliate of the Ohio EPA and Summit County Public Health, serving Medina, Portage, and Summit counties. The district focuses on air quality engineering, enforcement, and monitoring; however, it directs users to the Ohio EPA for permitting and defers to Ohio EPA regulations (ARAQMD 2014). The Northeast Ohio Area-wide Coordinating Agency (NOACA) is a transportation and environmental planning organization for the greater Cleveland area supporting five counties including Medina County. The air quality program within NOACA serves as an information clearinghouse and as a planning and advisory organization that includes the development of SIPs (NOACA 2014).

#### *3.2.1.5 Existing Emissions Sources*

The Ohio Western Reserve National Cemetery does not have any current emission sources. Power and heat to the existing structures are supplied from the local utility service. There are five regulated stationary air pollution emission sources in the city of Rittman; a cleaner, a salt manufacturer, a steel fabrication plant, a woodcraft facility, and a paperboard manufacturing facility (Envirofacts 2014).

#### *3.2.1.6 Sensitive Receptors*

CEQ's NEPA regulations require evaluation of the degree to which the proposed action affects public health (40 CFR 1508.27). Children, elderly people, and people with illnesses are especially sensitive to the effects of air pollutants; therefore, hospitals, schools, convalescent facilities, and residential areas are considered to be sensitive receptors for air quality impacts. No schools or hospitals are located within one mile of the cemetery. The nearest school is 2.1 miles away, and the nearest hospital is 3.5 miles from the site (NEPAssist 2014).

### 3.2.2 Environmental Consequences

The proposed project is located in an air quality control region designated as nonattainment for the 2008 lead standard, as nonattainment for the 2010 $SO_2$ standard, and as marginal nonattainment for the 2008 primary and secondary eight-hour ozone standard. Thus, a "conformity applicability analysis" (provided in the following paragraphs) is required to determine if the proposed project is subject to the general conformity requirements of the Clean Air Act. A "conformity determination" is required if the total direct and indirect emissions equal or exceed the *de minimis* threshold of the criteria pollutant and any precursor, and to determine if the federal project could interfere with implementing the SIP to achieve attainment status. The *de minimis* threshold for $SO_2$ and ozone and its precursors (VOCs and nitrogen oxides) is 100 tons per year. The *de minimis* threshold for lead is 25 tons per year (40 CFR 93.153(b)(1)).

#### *3.2.2.1 Proposed Action*

Under the Proposed Action, the construction period would include approximately 60 days of earthwork activities (excavation and grading). Particulates are the main air pollutant of concern from construction projects. Project activities would comply with state requirements (OAC 3745-17-08) by implementing reasonably available control measures (generally including water or chemical dust suppression) to prevent fugitive dust from becoming airborne. Still, construction activities would generate both coarse and fine particulate emissions from soil excavation and removal, grading and sloping, and small-scale road construction. The amount of particulate emissions can be estimated from the amount of ground surface exposed, the type and intensity of activity, soil type and conditions, wind speed, and dust control measures used. Total suspended particulates were calculated using the emission factor for heavy

construction activity operations from "AP-42, Compilation for Air Pollutant Emission Factors" (EPA 1995), to provide a conservative estimate of PM emissions. Estimates are shown in Table 3-3.

### Table 3-3. Estimate of Annual Particulate Emissions from Construction

| Total Area (acres) | Exposed Area (acres) | Construction Duration (months) | Emission Factor (tons/acre/month)[1] | Control Efficiency (%) | Total Suspended Particulate Emissions (tons) |
|---|---|---|---|---|---|
| 30 | 30 | 2 | 1.2 | 80 | 14.4 |

[1]Emission factor for "Heavy Construction Operations" (EPA 1995).

Non-road construction vehicles would emit less than significant amounts of $SO_2$ and the ozone precursors VOCs and $NO_x$. They would not emit lead. Criteria pollution emissions from construction equipment were calculated assuming the use of three backhoes, one grader, and one bulldozer operating for approximately eight hours per day for a total of 60 days. Emissions were estimated using "Off-Road – Model Mobile Source Emission Factors" from the California South Coast Air Quality Management District because Ohio and federal EPA emission factors are not available. Table 3-4 and Figure 3-1 show estimated emissions and calculations, respectively. Emissions of SOx, lead, NOx, and VOCs are below *de minimis* thresholds; therefore, conformity determinations are not required.

### Table 3-4. Estimate of Annual Non-Road Emissions of Criteria Pollutants

| Criteria Pollutant[2] | Estimated Emissions[1] | | | | |
|---|---|---|---|---|---|
| | $SO_x$ | $NO_x$ | VOCs[3] | CO | Lead |
| **Emissions (tons)** | 0.0015 | 1.0954 | 0.1440 | 0.6599 | 0 |
| ***de minimis* level (tons/year)** | 100 | 100 | 100 | NA | 25 |

[1] Calculated using "Off-road Mobile Source Emission Factors (Scenario Years 2007 – 2025) (SCAQMD 2014).
[2] PM emissions from non-road construction vehicles are included in the general construction emissions factor applied in the estimates in Table 3-3, and therefore non-road emissions of PM are not included in this table.
[3] VOCs are assumed to be equivalent to Reactive Organic Gases for calculating non-road construction equipment emissions.

The proposed project would include transporting excess soils offsite. Air emissions from this activity would be less than those estimated from the non-road construction activities and would not significantly increase overall project air emissions.

Operational impacts would also be minimal. On average, the cemetery performs 10 burials per day, a rate that would be continued under the Proposed Action. Therefore, operational activities such as digging, temporary stockpiling of soil, maintenance, and landscaping activities would continue for another 10 years. Fugitive dust and vehicle emissions would be unchanged from the existing operations.

Overall, short-term and long-term air quality impacts from construction and operation would be less than significant.

Short-term adverse air quality impacts could be minimized through dust control measures, construction scheduling, and vehicle speed limits. These minimization opportunities are described in Section 5.0.

## Figure 3-1. Air Emissions Calculations

**OWR Expansion Construction Emissions Calculations**

**Calculation of Fugitive Dust from General Construction**

| Area Description | Area | Exposed Area | Duration | EF TSP | Control Efficiency | Estimated Emissions |
|---|---|---|---|---|---|---|
| | (Acres) | (Acres) | (months) | (ton/acre/month) | (%) | (tons) |
| Total Area, Each Alternative | 30 | 30 | 2 | 1.2 | 80% | 14.4 |

http://www.epa.gov/ttnchie1/ap42/ch13/final/c13s02-3.pdf

Emission factor Section 13.2.3 "Heavy Construction Operations" (dated 1/95), of AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, U.S. EPA, Research Triangle Park, NC, 1998

**Assumed Total Operational Hours for Construction Equipment**

| Equipment Type | number | hours/day | total days | total hours |
|---|---|---|---|---|
| grader | 1 | 8 | 60 | 480 |
| backhoe | 3 | 8 | 60 | 1440 |
| bulldozer | 1 | 8 | 60 | 480 |

**SCAB Fleet Average Emission Factors (Diesel)**

| | ROG | CO | NOx | SOx | PM |
|---|---|---|---|---|---|
| | (lb/hr) | (lb/hr) | (lb/hr) | (lb/hr) | (lb/hr) |
| Rubber Tired Dozers | 0.2721 | 1.0420 | 2.2344 | 0.0025 | 0.0924 |
| graders | 0.1277 | 0.5931 | 0.9795 | 0.0015 | 0.0489 |
| Tractors/Loaders/Backhoes | 0.0666 | 0.3716 | 0.4501 | 0.0008 | 0.0298 |

http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/off-road-mobile-source-emission-factors

Emission factor year 2015. Composite emission factor used.

**Calculation of Criteria Pollutant Emissions from Nonroad Construction Vehicles**

| | | ROG | ROG | CO | CO | NOx | NOx | SOx | SOx | PM | PM |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Equipment | hours | (lb/hr) | total pounds | (lb/hr) | total pounds | (lb/hr) | total pounds | (lb/hr) | total pounds | (lb/hr) | total pounds |
| graders | 480 | 0.1277 | 61.31 | 0.5931 | 284.67 | 0.9795 | 470.15 | 0.0015 | 0.72 | 0.0489 | 23.46 |
| Tractors/Loaders/Backhoes | 1440 | 0.0666 | 95.97 | 0.3716 | 535.07 | 0.4501 | 648.10 | 0.0008 | 1.12 | 0.0298 | 42.89 |
| Rubber Tired Dozers | 480 | 0.2721 | 130.62 | 1.0420 | 500.15 | 2.2344 | 1072.53 | 0.0025 | 1.18 | 0.0924 | 44.37 |
| Total Pounds | | | 287.91 | | 1319.89 | | 2190.79 | | 3.01 | | 110.72 |
| Total Tons | | | 0.1440 | | 0.6599 | | 1.0954 | | 0.0015 | | 0.0554 |

**Non-Road Emissions in Tons**

| Pollutant | VOC | CO | NOx | SOx | PM |
|---|---|---|---|---|---|
| Emissions (tons) | 0.1440 | 0.6599 | 1.0954 | 0.0015 | 0.0554 |

### *3.2.2.2 Alternative Action*

Because the Alternative Action calls for approximately the same acreage of expansion as the Proposed Action and the improvements would be similar, air emissions would be relatively similar. Overall, short-term and long-term air quality impacts from construction and operation would be less than significant.

Short-term adverse air quality impacts could be minimized through dust control measures, construction scheduling, and vehicle speed limits. These minimization opportunities are described in Section 5.0.

### *3.2.2.3 No Action*

Under No Action, operational air emissions would continue until cemetery capacity is reached, after which air emissions from maintenance would be minimal.

## 3.3 Cultural Resources

Cultural resources include both historic and prehistoric archaeological resources, as well as historic structures in the built environment. This impact analysis focused on sites and structures listed in, or eligible for nomination to, the National Register of Historic Places (NRHP), and the regulations (36 CFR Part 800) for implementing Section 106 of the *National Historic Preservation Act* of 1966.

### 3.3.1 Existing Environment

The project area is located in southeastern Medina County, approximately 1.5 miles northwest of Rittman, Ohio. The project area itself is former farmland, cut by Tommy Creek, which encompassed the remains of three farmsteads at the time of the original cultural resources survey in 1993. The Proposed Action is located in the northwest portion of the original land selected for the Ohio Western Reserve National Cemetery. This portion of the cemetery property has been graded with roadways added for future development needs at the time of construction of the existing facility. There are no aboveground historic resources within the property boundary. Historic resources in the vicinity include several nineteenth century farmsteads with associated outbuildings.

The land acquired by VA for development of the Ohio Western Reserve National Cemetery, consisting of 97.1 hectares (240 acres), was surveyed in its entirety for archaeological resources and was investigated by a pedestrian survey supplemented with screened shovel testing (Otter 1993). The survey was conducted to identify and evaluate any archaeological resources that might have been adversely affected by development of the cemetery. Surface survey, using transects spaced at 10-meter intervals, identified 14 prehistoric sites (33ME290 through 33ME303). Shovel tests were excavated every 30 meters in transects spaced 30 meters apart. A total of 177 shovel tests were excavated, resulting in documentation of two historic sites (33ME304 and 33ME305). A third historic site (33ME306) was documented on the basis of standing structures and the potential for archaeological deposits.

Sites 33ME290 through 33ME303 consisted of one to four prehistoric lithic artifacts, none of which were diagnostic. Site size ranged from 1 to 100 square meters for these 14 sites. Nine of the 14 sites had isolated finds. None of these sites were deemed eligible for the NRHP. Site 33ME304 is the Shook site, an archaeological component associated with a standing structure. The site dimensions were given as 200 meters north-south by 100 meters east-west. Two shovel test pits were positive for artifacts at this location. Shovel Test 22 Level 1 yielded one piece of window glass and one piece of plain whiteware, while Shovel Test 27 Level 1 yielded one piece of asbestos siding, two pieces of coal, three brick fragments, one piece of window glass, one screwlid-type jar rim fragment, and two pieces of whiteware. Shovel Test 34 revealed a line of mortar 6 centimeters below the surface, running north/south; this line of mortar was traced for a length of 1.5 meters (5 feet) and is believed to be associated with a house foundation. Site 33ME305, the Hutchinson site, had an estimated area of 110 meters by 110 meters, with the western edge of the site situated along Rawiga Road. One positive shovel test pit produced one round nail, one amber bottle glass fragment, four pieces of mortar, one piece of concrete, two brick fragments, and four pieces of buff stoneware, all from Level 1. This archaeological component was associated with a concrete block garage and the ruined remains of a barn. Site 33ME306, the Walker site, was assumed to be associated with an extant structure, but no shovel tests were excavated in the lawn surrounding the property as the house was occupied at the time of survey.

During an onsite meeting with NCA staff on December 16, 2014, David Snyder of the Ohio State Historic Preservation Office (SHPO) confirmed that the original 1993 survey was adequate, that it had been accepted when it was submitted for review, and that no further archaeological survey is required in connection with any part of the current project included in the original survey.

The 1993 survey also noted standing structures in the project area associated with the historic archaeological sites mentioned above. These included a concrete block garage and ruined remains of a barn associated with the Hutchinson site; a late nineteenth century barn, two frame garages, and a corrugated steel silo associated with the Shook site; and a late nineteenth century house, barn, and shed associated with the Walker site. Of these, only the Shook barn, recorded for the Ohio Historic Inventory as MED0050317, was considered potentially significant for its architectural merits as a slate roofed barn.

All of the standing structures were demolished during the initial development of the national cemetery property.

Today the property functions as Ohio Western Reserve National Cemetery. Although the cemetery is not 50 years of age, the National Park Service has determined that all national cemeteries are exceptionally significant places that are eligible for listing in the NRHP. Those portions of the national cemetery property that have been developed for cemetery purposes are considered contributing, while unimproved acreage is considered noncontributing (NPS 2011).

The area surrounding the national cemetery is characterized by a golf course to the south, wooded land to the east, twentieth century residential development to the west, and agricultural development to the north and northwest. Farmsteads dating to the nineteenth century were noted at 3700 and 3414 Seville Road. A large barn was noted at 3030 Seville Road. The farmstead at 3414 Seville Road was previously recorded as MED0031017, the Lee Straub House. Per guidance provided by David Snyder of Ohio SHPO, these properties were not formally evaluated for the current project.

## 3.3.2 Environmental Consequences

The Section 106 Criteria for Adverse Effect (36 CFR 800.5) defines an undertaking (action) as having an adverse effect on historic properties if the undertaking would alter, directly or indirectly, any of the characteristics that qualify a property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. The analysis considers potential effects to cultural resources located in and within view of the project area.

### *3.3.2.1 Proposed Action*

Outside of the national cemetery itself, the Proposed Action would not directly affect any historic properties that are eligible for listing in the NRHP. Since the project is in keeping with NCA design standards for national cemeteries, it would result in no adverse effect to the NRHP-eligible national cemetery property.

During the December 2014 site visit, David Snyder of Ohio SHPO stated that the development of the Ohio Western Reserve National Cemetery in 1994-1995 was in keeping with the environmental setting of the surrounding area and had resulted in no adverse effect. Since the proposed expanded development of the cemetery property is in keeping with the original character and purpose of the site, it likewise poses no adverse effect to any historic properties that may be located within its viewshed or the surrounding area.

### *3.3.2.2 Alternative Action*

As with the Proposed Action, the Alternative Action would not directly affect any historic properties that are eligible for listing in the NRHP. Since the layout of this alternative is also in keeping with NCA design standards for national cemeteries, it would result in no adverse effect to the NRHP-eligible national cemetery property.

### *3.3.2.3 No Action*

No construction or cemetery operation in expansion areas would occur under the No Action alternative. Therefore, there would be no impact to cultural resources.

# 3.4 Geology and Soils

## 3.4.1 Existing Environment

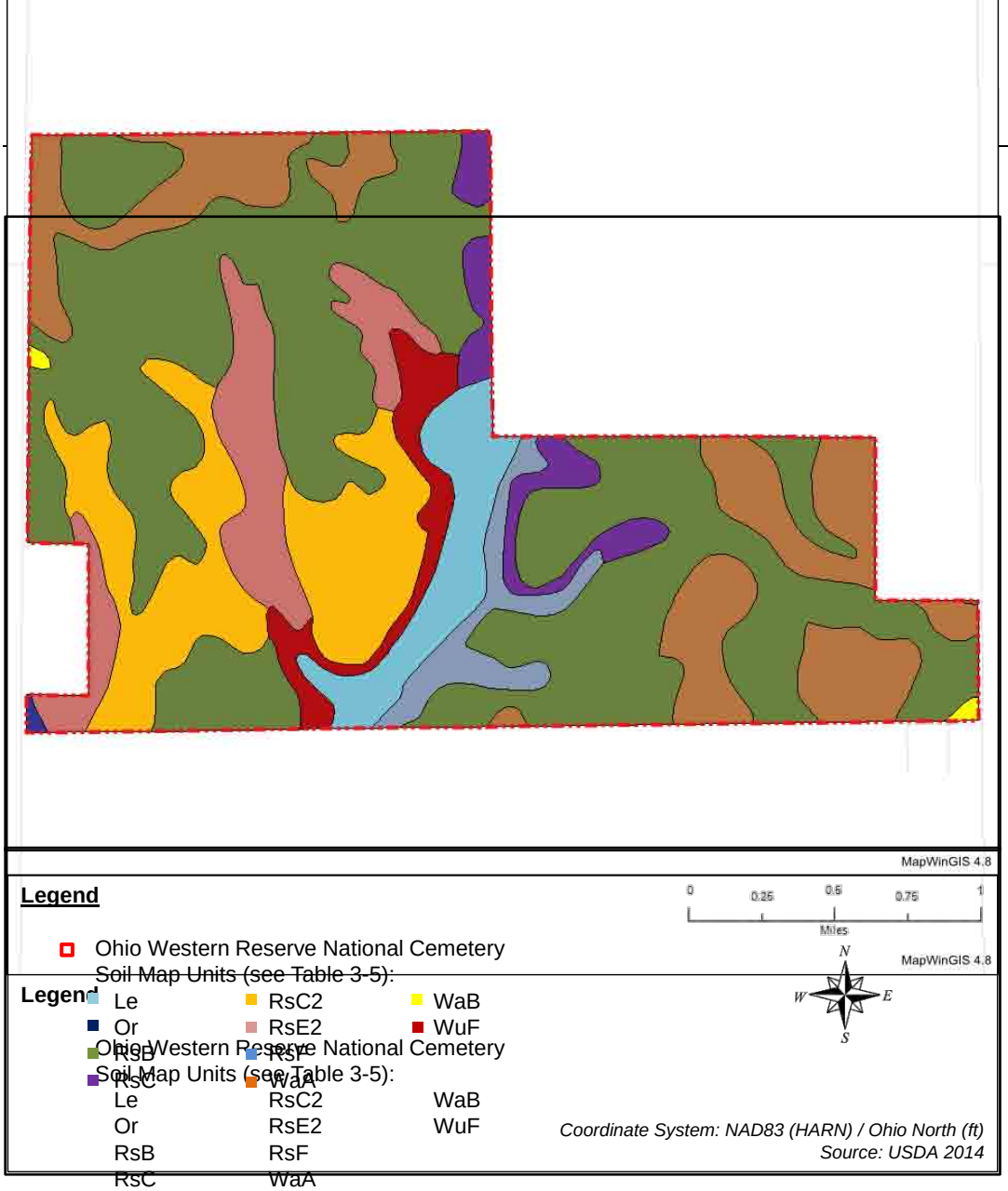
The Ohio Western Reserve National Cemetery is located in Ohio Soil Region VII, which includes soils formed in low and medium lime glacial drift of Wisconsin Age. These soils are deep and are poorly to moderately well-drained. Due to seasonal wetness, slow to very slow permeabilities are typical (VA 1992).

The cemetery is located in seismic zone 1, indicating some earthquakes have occurred and are expected, but little or no damage should result (VA 1992).

The site generally slopes from north to south and from the western and eastern boundaries to Tommy Run in the central portion of the site. Site drainage is generally good, with few areas of water retention.

Figure 3-2 depicts the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS) National Cooperative Soil Survey for the cemetery property. Table 3-5 presents the acreages associated with each soil type.

The EIS prepared to select the cemetery site (VA 1992), together with operating experience since the cemetery's opening, have not identified any issues associated with the site geology and soils.




Legend
Ohio Western Reserve National Cemetery
Soil Map Units (see Table 3-5):
Le
Or
RsB
RsC
RsC2
RsE2
RsF
WaA
WaB
WuF
MapWinGIS 4.8
Coordinate System: NAD83 (HARN) / Ohio North (ft)
Source: USDA 2014

**Table 3-5. Ohio Western Reserve National Cemetery Soils**

| Soil Map Unit | Soil Name | Acres | Percent |
|---|---|---|---|
| Le | Lobdell silt loam | 13.9 acres | 5.1 |
| Or | Orville silt loam | 0.3 acres | 0.1 |
| RsB | Rittman silt loam, 2 to 6 percent slopes | 129.9 acres | 48.0 |
| RsC | Rittman silt loam, 6 to 12 percent slopes | 9.1 acres | 3.4 |
| RsC2 | Rittman silt loam, 6 to 12 percent slopes, moderately eroded | 36.6 acres | 13.5 |
| RsE2 | Rittman silt loam, 12 to 25 percent slopes, moderately eroded | 20.7 acres | 7.7 |
| RsF | Rittman silt loam, 25 to 70 percent slopes | 8.1 acres | 3.0 |
| WaA | Wadsworth silt loam, 0 to 2 percent slopes | 42.6 acres | 15.7 |
| WaB | Wadsworth silt loam, 2 to 6 percent slopes | 0.6 acres | 0.2 |
| WuF | Wooster silt loam, 25 to 70 percent slopes | 8.8 acres | 3.2 |

Source: USDA 2014.

Prime farmland soil types are of importance in meeting the U.S. needs for food and fiber. Soil type RsB is considered prime farmland, and soil types Or, WaA, and WaB are considered prime farmland if drained and protected from flooding. The areas under consideration for the Proposed Action and the Alternative Action are not currently farmed, and the previous EIS considered conversion of the cemetery property from previous uses (VA 1992). The actions evaluated in this EA would not result in conversion of additional lands outside of the current cemetery property.

## 3.4.2 Environmental Consequences

The 1992 cemetery development EIS concluded that soil characteristics would not preclude cemetery use. Operation of the cemetery to date has verified this conclusion as soil characteristics have not negatively impacted cemetery operations.

### *3.4.2.1 Proposed Action*

The Proposed Action would predominantly occur in the northeast portion of the cemetery site, in an area of minimal to moderate sloping towards natural site drainages and ultimately Tommy Run. Proposed cut and fill actions in areas of severe sloping would be limited to those necessary to reduce erosion potential (cemetery operations in areas of severe sloping are less practicable and avoided when possible). Soils generated during excavation would be reutilized in areas requiring fill material or transported offsite. Site topography would not be substantially altered. Drainage changes resulting from changes to site topography are anticipated to be minimal and would be monitored for erosion potential through routine site stormwater management practices.

Minor short-term adverse erosion and sedimentation impacts would be possible during both the construction and operational phases of the project. Construction activities (including vegetative clearing, adjustments to site grading, new roadway construction, and construction of small structures) would disturb and expose subsurface soils, increasing susceptibility to wind and surface runoff erosion. Wind erosion could temporarily increase airborne particulate matter in the area, resulting in short-term health, visibility, and aesthetics impacts. Temporary increases in sedimentation in stormwater drainages could occur as a result of surface runoff erosion.

NRCS determined that the Proposed Action site contains approximately 19.3 acres of prime and unique farmland, which would be irreversibly converted in the cemetery expansion. The Farmland Conversion Impact Rating form (Form AD-1006) completed jointly by VA and NRCS assigned a relative value and site assessment score of 120 points to the proposed site. As the proposed site was assigned a total score of less than 160 points, the site does not require further consideration for protection, and the impact to prime and unique farmland is not considered significant.

Minor short-term adverse erosion and sedimentation impacts could be minimized through implementation of construction best management practices and conformance with National Pollutant Discharge Elimination System (NPDES) permit requirements. These minimization opportunities are described in Section 5.0.

A general stormwater permit from Ohio EPA must be obtained because the construction activities would disturb one or more acres of land.

### *3.4.2.2 Alternative Action*

Predicted impacts to geology and soils for the Alternative Action would be the same as those for the Proposed Action, but would predominantly be located in the western portion of the cemetery. Minor short-term adverse erosion and sedimentation impacts would be possible during both the construction and

operational phases of the project. Construction activities would increase susceptibility to wind and surface runoff erosion. Wind erosion could temporarily increase airborne particulate matter in the area, resulting in short-term health, visibility, and aesthetics impacts. Temporary increases in sedimentation in stormwater drainages could occur as a result of surface runoff erosion.

NRCS determined that the Alternative Action site contains approximately 21.9 acres of prime and unique farmland, which would be irreversibly converted in the cemetery expansion. The Farmland Conversion Impact Rating form (Form AD-1006) completed jointly by VA and NRCS assigned a relative value and site assessment score of 120 points to the alternative site. As the alternative site was assigned a total score of less than 160 points, the site does not require further consideration for protection, and the impact to prime and unique farmland is not considered significant.

Similar to the Proposed Action, minor short-term adverse erosion and sedimentation impacts could be minimized through implementation of construction best management practices and conformance with NPDES permit requirements. These minimization opportunities are described in Section 5.0.

A general stormwater permit from Ohio EPA must be obtained because the construction activities would disturb one or more acres of land.

#### *3.4.2.3 No Action*

Under No Action, cemetery expansion would not occur and no impacts to geology and soils would result.

## 3.5 Hydrology and Water Quality

### 3.5.1 Existing Environment

The Ohio Western Reserve National Cemetery is located in in the Chippewa Creek subwatershed, within the Tuscarawas River watershed (hydrologic unit 05040001020) (Ohio EPA 2014b). The site drains into Tommy Run and, ultimately, Chippewa Creek and the Ohio River. The site generally slopes from north to south and from the western and eastern boundaries to Tommy Run in the central portion of the site. Site drainage is generally good, with few areas of water retention. Stormwater runoff from impervious surfaces on cemetery property is collected in a pond in the southern portion of the property and is reused for landscape irrigation.

The depth to groundwater in the site area is approximately 10 to 25 feet. The cemetery property overlies an unconsolidated aquifer in two areas as follows (ODNR 2000).

- The central portion of the property overlays the Chippewa Buried Valley Aquifer. The subsurface lithology is primarily till and contains sand and gravel lenses of varying thickness. The drift thickness can be over 100 feet. Groundwater yields of 5 to 25 gallons per minute can be expected.
- The western and eastern portions of the property overlay the Medina Thin Upland Aquifer. The subsurface lithology is primarily till and contains sand and gravel lenses of varying thickness. The drift thickness is 25 to 100 feet. Groundwater yields of 5 to 25 gallons per minute can be expected.

The cemetery property also overlies the Mississippian Bedrock Aquifer.

Additional information relating to regional hydrology can be found in the EIS prepared to select the cemetery site (VA 1992).

## 3.5.2 Environmental Consequences

The 1992 cemetery development EIS concluded that surface water would not be significantly impacted by cemetery construction and operations (including pesticide application). The EIS also concluded that groundwater quality would not be significantly impacted by cemetery operations. Operation of the cemetery to date has verified these conclusions; soil erosion has been effectively managed and has not impacted surface waters, and neighboring users of groundwater have not been negatively impacted.

### *3.5.2.1 Proposed Action*

The Proposed Action would predominantly occur in the northeast portion of the cemetery site, in an area of minimal to moderate sloping towards natural site drainages and ultimately Tommy Run. Minor short-term adverse erosion and sedimentation impacts associated with construction activities would be possible, as described in Section 3.4.2.1. Minimization opportunities are described in Section 5.0, including conformance with NPDES permit requirements. Long-term impacts would not be expected.

Cemetery operations in the area of the Proposed Action would have minimal impacts on groundwater, consistent with the findings of the 1992 cemetery development EIS. If shallow groundwater areas are encountered during construction, groundwater engineering controls would be implemented, potentially including temporary dewatering activities. Pesticide application and the use of road deicing chemicals are conducted to the minimum extent necessary and in accordance with manufacturer specifications, resulting in minimal impacts to surface water and groundwater resources.

The potential impacts from release of embalming fluid during decomposition were evaluated in the 1992 EIS for construction and operation of the Ohio Western Reserve National Cemetery; the EIS concluded that it was most unlikely that embalming could pose a threat to groundwater quality. Use of standard modern burial practices would reduce any potential for release of embalming fluid or other decomposition byproducts to groundwater or subsurface soil. NCA cemetery burial practices include pre-placement of concrete vaults, into which caskets are set as interments occur. The EIS described how water percolates through soil around and below impermeable objects, such as a burial vault, and does not wet soil below such objects. Compared to chemicals commonly used for embalming prior to approximately 1910, modern embalming fluids are markedly less toxic. Alternatives to formaldehyde-based embalming fluids are available such as glutaraldehyde solutions and alkaline hydrolysis. Formaldehyde dissolves easily in water, easily biodegrades, and is not commonly found in drinking water supplies. Adsorption to soil or sediment is predicted to be low. No evidence of bioaccumulation has been found (ATSDR 1999). Recent trends also show there is an increasing selection of cremain interment or columbaria placement, which do not utilize embalming fluids in preparation for either of these interment methods.

VA is developing a green burial option; the program is in the early planning stages but could see a pilot project starting later this year, with full implementation as soon as fall 2016. In a green burial, the body is not embalmed and is simply placed in a biodegradable coffin or shroud and interred without a concrete burial vault. The grave site is allowed to return to nature, with a goal of complete decomposition of the body. In some locations or within some organizations, burial of cremated remains in a biodegradable container is also considered a green burial.

The Proposed Action includes installation of a new groundwater supply well for irrigation of cemetery grounds. Neighboring groundwater wells have static water levels between 10 and 30 feet below ground surface and have test flow rates of approximately 20 gallons per minute. The new groundwater supply well would be sited and operated, in consultation with appropriate contractors and regulatory agencies, to have minimal impacts on existing groundwater users. NCA would take advantage of the service provided by the Ohio Department of Natural Resources, Division of Soil and Water Resources, to review well logs,

groundwater studies, and basic geologic data and report on the area's groundwater resources, type of water-bearing formation, expected well depths, and yield (ODNR 2015). Seasonal irrigation to maintain cemetery landscaping is typically required between May and September.

Impacts to hydrology and water quality could be minimized through erosion and sedimentation controls and continued responsible use of pesticides and road deicing chemicals. These minimization opportunities are described in Section 5.0.

#### *3.5.2.2 Alternative Action*

Predicted impacts to surface water and groundwater for the Alternative Action would be the same as those for the Proposed Action, but would be located predominantly in the western portion of the cemetery. Minor short-term adverse erosion and sedimentation impacts associated with construction activities would be possible; long-term impacts would not be expected. Cemetery operations (including both burial operations and site maintenance activities) would have minimal impacts on surface water and groundwater, as described above. A new groundwater well would be sited and operated such that minimal impacts on existing groundwater users would be realized.

Impacts to hydrology and water quality could be minimized through erosion and sedimentation controls and continued responsible use of pesticides and road deicing chemicals. These minimization opportunities are described in Section 5.0.

#### *3.5.2.3 No Action*

Under the No Action Alternative, cemetery expansion would not occur and no impacts to hydrology or water quality would result.

## 3.6 Wildlife and Habitat

### 3.6.1 Existing Environment

The cemetery property includes paved roadways and walkways, maintained landscape turf, scattered deciduous trees, undeveloped areas of meadow-type vegetation, one area containing excavation spoils, and Tommy Run with adjacent undeveloped riparian habitat.

The presence of wetland-associated vegetation in areas that would be developed under the Proposed Action and Alternative Action was included in the wetlands survey summarized in Section 3.9. Invasive common reed grass (*Phragmites australis* ssp. *australis*), a tall distinctive plant that propagates by seeds as well as an extensive underground rhizome system, was observed in the area that would be developed under the Proposed Action during a November 2014 site visit. The late fall post-growing season and snow cover prevented further plant observations during this visit.

Wildlife species observed on the cemetery property during the site visit include white-tailed deer, rabbits, squirrels, hawks, starlings, and finches. Other common mammal and bird species of Ohio are also likely to be present on the property, particularly in undeveloped areas.

Six plants and seven animals are currently listed with a special status by the U.S. Fish and Wildlife Service (FWS) or the State of Ohio (Table 3-6). The 1992 EIS reported that the State of Ohio said no species on the state list of endangered animal species have been observed in the vicinity of the cemetery site.

### Table 3-6. Special Status Species in Medina County, Ohio

| Species | Habitat | Federal Status | State Status |
|---|---|---|---|
| American sweet-flag (*Acorus americanus*) | Wet meadows, marshes, and swales. | — | Potentially threatened |
| Prairie false indigo (*Baptisia lactea*) [1] | Prairies, barrens, other open habitats. | — | Potentially threatened |
| Bush's sedge (*Carex bushii*) | Moist prairies, fields, and meadows in full sun. | — | Threatened |
| Thin-leaved sedge (*Carex cephaloidea*) | Dry to mesic deciduous and mixed forests and forest margins. | — | Potentially threatened |
| Long beech fern (*Phegopteris conectilis*) | Acidic soil or rocks in full shade; seeps on cliff faces. | — | Potentially threatened |
| Tiger spiketail (*Cordulegaster erronea*) | Forest insect, rarely encountered in open, sun-lit area. Permanent coldwater forest streams and seepages are ideal breeding habitat, presence of skunk cabbage along stream corridor is an indicator of appropriate habitat. | — | Species of concern |
| Magnolia warbler (*Dendroica magnolia*) | Coniferous forest. Breeds in open stands of young spruce and fir. On migration, almost any place with shrubbery or trees. | — | Special interest |
| Bald eagle (*Haliaeetus leucocephalus*) | Near estuaries, large lakes, reservoirs, rivers, and some seacoasts with a good food base, perching areas, and nesting sites. In winter, the birds congregate near open water in tall trees for spotting prey and night roosts for sheltering. | Protected [2] | — |
| Indiana bat (*Myotis sodalis*) | Hibernacula = caves and mines; Maternity and foraging habitat = small stream corridors with well-developed riparian woods; upland forests | Endangered [3] | Endangered |
| Bigmouth shiner (*Notropis dorsalis*) | Pools where they swim in schools just above the substrate; almost always found in areas with a sandy substrate. Rocky and Black River drainages and occasionally in other nearby Lake Erie tributaries. | — | Threatened |
| Blacknose shiner (*Notropis heterolepis*) | Last seen in Rocky Fork Creek near New Albany in the early 1980s; likely no longer found in Ohio. Require very clear water with moderate amounts of aquatic vegetation and a clean sand substrate. Quickly disappears when waters become turbid and the substrate silted over with clay. | — | Extirpated |
| Northern long-eared bat (*Myotis septentrionalis*) | Hibernates in caves and mines - swarming in surrounding wooded areas in autumn. During late spring and summer, roosts and forages in upland forests. | Proposed endangered [3] | — |

Sources: Ohio Division of Wildlife 2012, FWS 2014
[1] Historical range included Medina County; not recorded in county from 1980 to present.
[2] Protected under the *Bald and Golden Eagle Protection Act*, *Migratory Bird Treaty Act*, and *Lacey Act*.
[3] Pursuant to programs implementing the provisions of the *Endangered Species Act*.

## 3.6.2 Environmental Consequences

### *3.6.2.1 Proposed Action*

Construction activities would displace common wildlife that inhabit or use the project site for nesting, foraging, or cover and potentially cause direct mortality of less mobile subterranean species, such as moles. The typical terrestrial wildlife species that could be impacted are widely distributed; thus, loss of some individuals and habitat would not measurably impact population abundance or distribution throughout their range.

Any initial clearing of an area within the project site that occurs during bird breeding season (generally April through July) could impact nesting migratory birds, protected under the *Migratory Bird Treaty Act*. Project or construction personnel would typically walk through the site immediately before initial clearing of an area, surveying for potential issues of any type. Impact minimization procedures would include ensuring that any initial ground clearing from April through July includes awareness of the potential for ground-nesting birds during walk-through observations. For nesting sites discovered within active or imminent construction areas, nest protection practices would be developed in consultation with VA Office of Construction & Facilities Management environmental staff, on a case-by-case basis in consideration of nest location, bird species and habitat requirements, expected duration of nesting activity, and the location, type, and duration of construction activities (based on recommendations published by Rashin and Frye 2013).

The establishment of non-native plants or noxious weeds would not occur, because turf and some paved surfaces would be installed in all disturbed areas as part of the Proposed Action.

The Indiana bat and northern long-eared bat both winter in caves and mines, none of which are present on the site. However, in the late spring and summer, these bats migrate to wooded areas where Indiana bats in particular roost under loose tree bark on living or dead trees. Most of the area proposed for development is open, with a few widely scattered deciduous trees. However, the edge of a relatively undisturbed woodland to the east of the NCA property extends from 20 to 200 feet into the northeast corner of the proposed expansion area, and would be pushed back along some of its length where needed to accommodate site development. No summering Indiana bats or northern long-eared bats have been reported onsite to date. Due to limited tree disturbance and no site records of summer maternity habitat for protected bat species, NCA concluded that the proposed project would have no effect on the Indiana bat or northern long-eared bat or their habitat.

In response to VA's request for project review, FWS stated that all projects in Ohio are within the range of the Indiana bat and this project is also within the range of the northern long-eared bat (FWS 2015; Appendix A). Regarding protection for both bat species, FWS stated "If no caves or abandoned mines are present and trees cannot be avoided, <u>any</u> unavoidable tree removal should only occur between October 1 and March 31. ... Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species." There are no caves or abandoned mines on the project site. To avoid any potential impacts to summer maternity habitat for either bat species, NCA has incorporated into the Proposed Action the following protective measure as specified by FWS: any unavoidable tree removal would only occur between October 1 and March 31.

There are no federal wilderness areas, wildlife refuges, or designated critical habitat within the vicinity of the project area (FWS 2015).

The bald eagle is found near estuaries, large lakes, reservoirs, rivers, and some seacoasts with a good food base, perching areas, and nesting sites. In winter, the birds congregate near open water in tall trees for

spotting prey and night roosts for sheltering. The project site offers no habitat with these characteristics, and thus would be expected to see only transitory presence of bald eagles, if any at all. Therefore, NCA concludes that the proposed project is not likely to adversely affect the bald eagle or its habitat.

Cemetery operations would continue the responsible use of pesticides and road deicing chemicals, keeping usage to the lowest quantities possible and thereby reducing potential indirect impacts to Tommy Run and the associated riparian habitat.

State-listed species that could occur in the proposed expansion area based on suitable conditions and expectation that the species is still present in Medina County include Bush's sedge and thin-leaved sedge, two easily overlooked grass-like plants. They are more likely to occur in moist conditions. A wetlands survey of the proposed project site did not identify either species among the vegetation observed; thus, it is not expected that these species are present on the proposed project site.

Impacts to wildlife and habitat from the Proposed Action would be less than significant, and could be further minimized through the procedures described above and listed in Section 5.0.

#### *3.6.2.2 Alternative Action*

The location of the Alternative Action is approximately 400 to 800 feet west of the Proposed Action area, with similar existing habitat. Impacts to wildlife and habitat from the Alternative Action would be similar to those identified for the Proposed Action, and would be less than significant.

#### *3.6.2.3 No Action*

Under the No Action Alternative, cemetery expansion would not occur and no impacts to wildlife or habitat would result.

## 3.7 Noise

### 3.7.1 Existing Environment

The Ohio Western Reserve National Cemetery is located in a quiet rural setting with agricultural and low-to-medium density residential land uses surrounding the site. Sensitive noise receptors include hospitals, schools, churches and cemeteries, libraries, and public parks. The nearest sensitive receptors to the cemetery are depicted in Figure 3-3 and include the following:

- Hospitals – The nearest hospital is the Summa-Wadsworth-Rittman Hospital near Wadsworth, OH, approximately 4.3 miles northeast of the site. Nursing and rehabilitation centers are also located in Rittman, OH (approximately 3.3 miles southeast) and in Seville, OH (approximately 4.6 miles west).
- Schools – The nearest schools include Rittman Elementary and Rittman Middle/High School (approximately 2.8 miles south) and Seville Elementary (approximately 3.7 miles west).
- Churches and cemeteries – The nearest church or cemetery, aside from the Ohio Western Reserve National Cemetery itself, is the Hillcrest Memorial Gardens (approximately 1 mile northeast).
- Libraries – The nearest library is the Rittman Branch Library (approximately 3.3 miles south).
- Public parks – The nearest public park is the Martin Fritz Memorial Park (approximately 3.4 miles southeast).

Other potentially sensitive noise receptors include neighboring residences (the nearest of which is immediately adjacent to the western cemetery property boundary) and the Rawiga Golf and Swim Club (immediately adjacent to the southern cemetery property boundary).

The principal sources of noise in the area include traffic along Rawiga Road and on the cemetery property, periodic construction and maintenance activities, and ceremonial M-16 rifle salutes. The overall noise levels are typical of a quiet rural area and are consistent with a cemetery setting.

During a site visit to the Ohio Western Reserve National Cemetery on November 21, 2014, sound level measurements were collected to determine the representative existing sound levels in the project areas; the monitoring locations are depicted on Figure 3-4. Sound levels were measured using an Extech Instruments Model 407736 digital sound level meter, which meets American National Standards Institute S1.4-1983 and International Electrotechnical Commission 60651 Type II standards. The meter's internal calibration feature was checked prior to obtaining measurements at each location, and the meter was operated on the A-weighting scale with slow response using a porous windscreen. Results are as follows:

- Monitoring location #1 (Proposed Action area) – Measured sound levels ranged from 48.6 A-weighted decibels (dBA) to 62.4 dBA. Higher sound levels were consistent with periodic wind gusts; no other significant noise sources were noticed.
- Monitoring location #2 (Alternative Action area) – Measured sound levels ranged from 48.7 dBA to 52.9 dBA. Higher sound levels were consistent with periodic wind gusts; no other significant noise sources were noticed. Location #2 was more protected from windy conditions than Location #1.

**Figure 3-3. Ohio Western Reserve National Cemetery Noise-Sensitive Receptors**

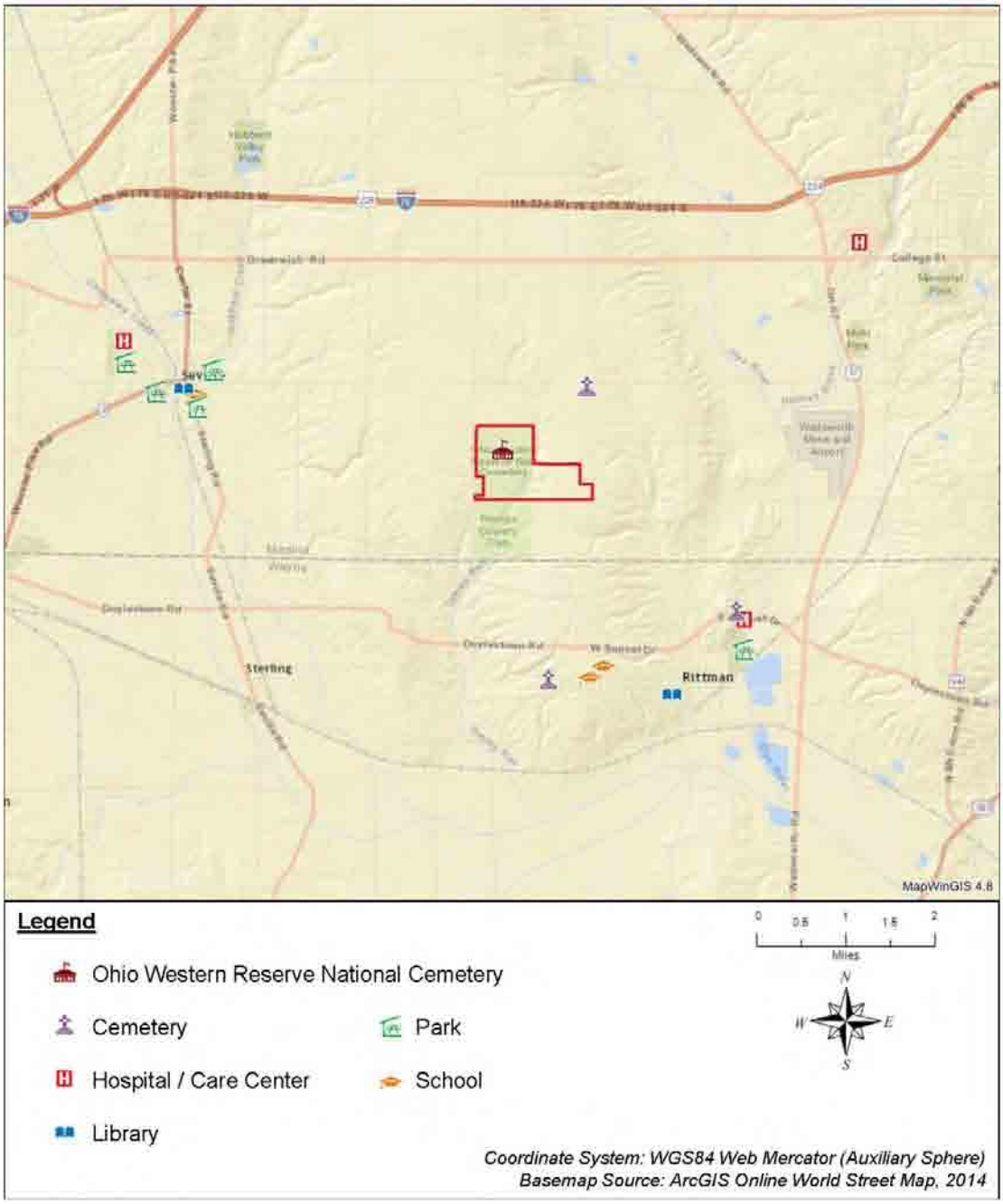
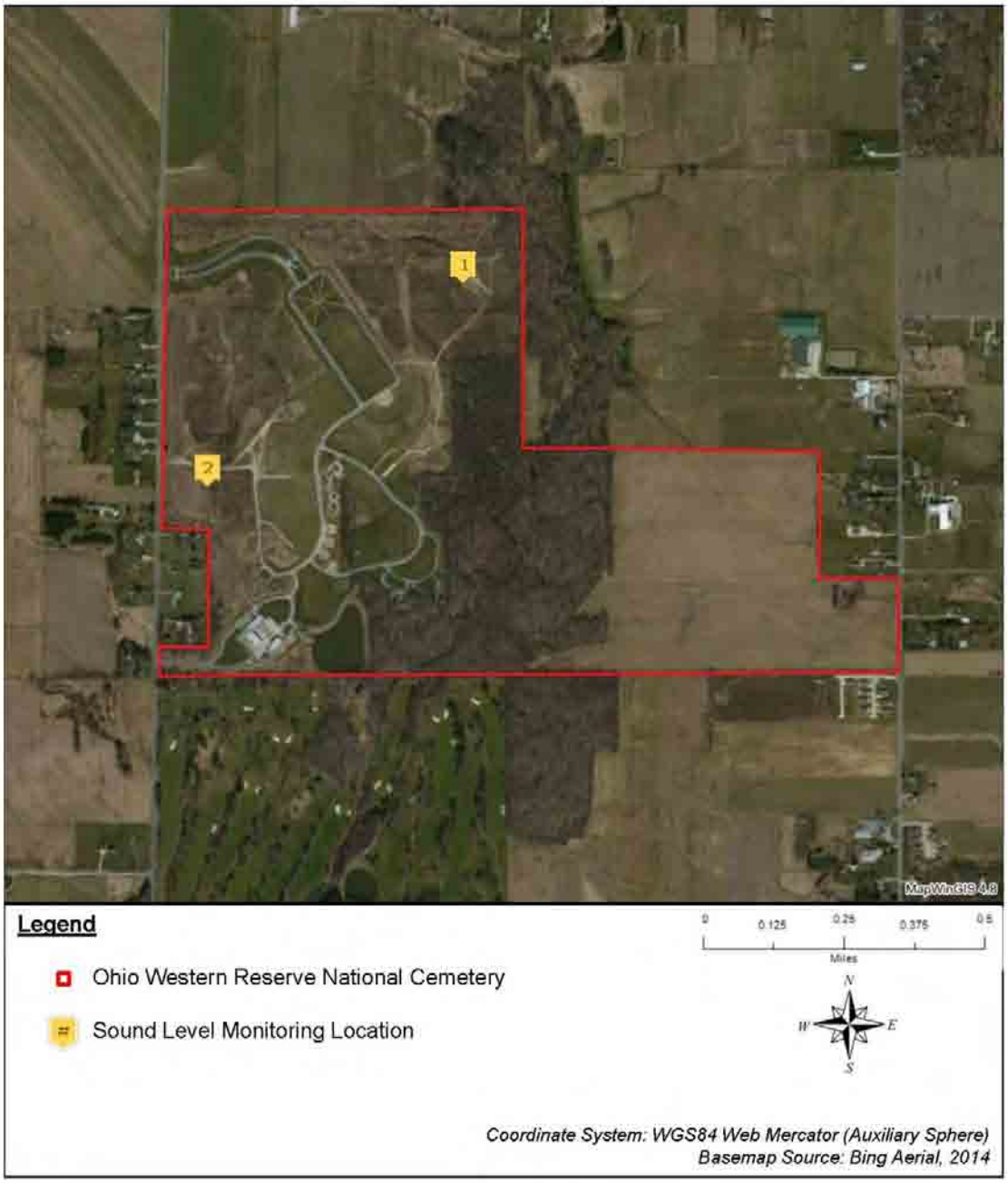


**Figure 3-4. Ohio Western Reserve National Cemetery Sound Level Monitoring Locations**



## 3.7.2 Environmental Consequences

The 1992 cemetery development EIS concluded that construction-related noise may impact neighboring residences; however, those residences typically have a greater noise impact from area traffic noise than from noise generated on cemetery property. Operation of the cemetery to date (including ceremonial M-16 rifle salutes) has not resulted in noise complaints from neighboring residents. In fact, during the scoping meeting for this EA, adjacent residents stated that they voluntarily conduct activities on their own property with a measure of sensitivity about noise generation during cemetery services and ceremonies. One resident inquired as to whether changes in the wooded buffer would expose those attending funeral services or visiting the cemetery to noise from offsite activities; however, due to limited and selective tree removal and installation of new landscaping, this is not expected to be an issue.

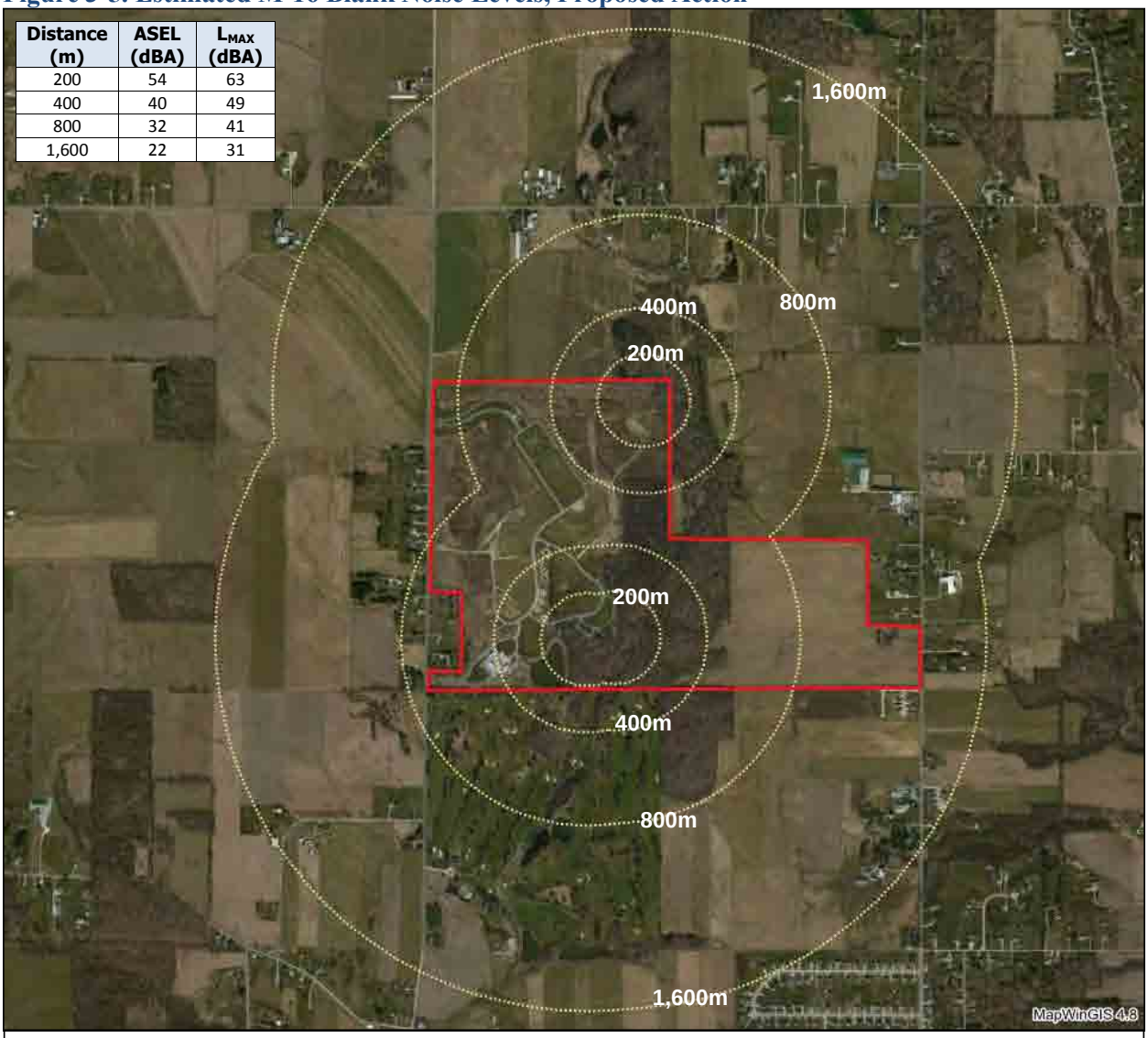
### *3.7.2.1 Proposed Action*

Construction activities under the Proposed Action would result in minor short-term adverse noise impacts similar to those described in the 1992 cemetery development EIS. Sources of construction-related noise would include construction equipment (including land clearing and grading equipment, trucks removing excess soils and waste, and road construction and paving equipment) and other contractor vehicles commuting to and from the site. Construction activities would be scheduled to minimize impacts to interment ceremonies to the extent possible. Construction will take place during daylight hours unless there is a specific action that would directly impact the operation of the cemetery.

The Proposed Action would result in minor, intermittent, long-term adverse noise impacts due to expanded cemetery operations in the northeastern portion of the cemetery; operational impacts were not evaluated in detail in the 1992 cemetery development EIS. Sources of operational-related noise include ceremonial M-16 rifle salutes and grounds maintenance equipment (including mowers, leaf blowers, and small vehicles). These operational-related noise sources are consistent with the current operations of the cemetery and have not resulted in noise complaints from neighboring residents.

M-16 rifle salutes are performed at a Committal Shelter during Veteran interment ceremonies. Currently, an average of 10 interment ceremonies are performed daily of which approximately 60 percent are for Veterans and are accompanied with a rifle salute (resulting in an approximate average of six rifle salutes performed daily). Rifle salutes typically consist of three to five rifles. Figure 3-5 depicts the predicted A-weighted sound exposure level (ASEL) and A-weighted maximum sound level ($L_{MAX}$) at various distances from the two existing committal shelter locations and the new committal shelter location under the Proposed Action, based on M-16 blank sound level provided by VA (VA 2014b). These sound levels correspond to firing directly at the receptor (0 degrees) and do not account for sound shielding from tree lines, berms, and other buffers; thus, actual sound levels are expected to be lower than those shown. For comparison purposes, speech ranges from 50 to 80 dBA, and area background sound levels were measured between 48 and 62 dBA. As such, noise from ceremonial rifle salutes is a minor contributor to overall sound levels.

**Figure 3-5. Estimated M-16 Blank Noise Levels, Proposed Action**




| Distance (m) | ASEL (dBA) | $L_{MAX}$ (dBA) |
|---|---|---|
| 200 | 54 | 63 |
| 400 | 40 | 49 |
| 800 | 32 | 41 |
| 1,600 | 22 | 31 |

**Legend**

- Ohio Western Reserve National Cemetery
- Distance from Committal Shelter Locations

0 0.125 0.25 0.375 0.5
Miles

N W E S

*Coordinate System: WGS84 Web Mercator (Auxiliary Sphere)*
*Basemap Source: Bing Aerial, 2014*

Aside from residences neighboring the cemetery property, other noise-sensitive receptors would not be affected under the Proposed Action due to their distance from the cemetery.

Minor short-term and long-term adverse noise impacts could be minimized through construction scheduling, interment service planning, and utilization of sound shielding. These minimization opportunities are described in Section 5.0.

#### 3.7.2.2 Alternative Action

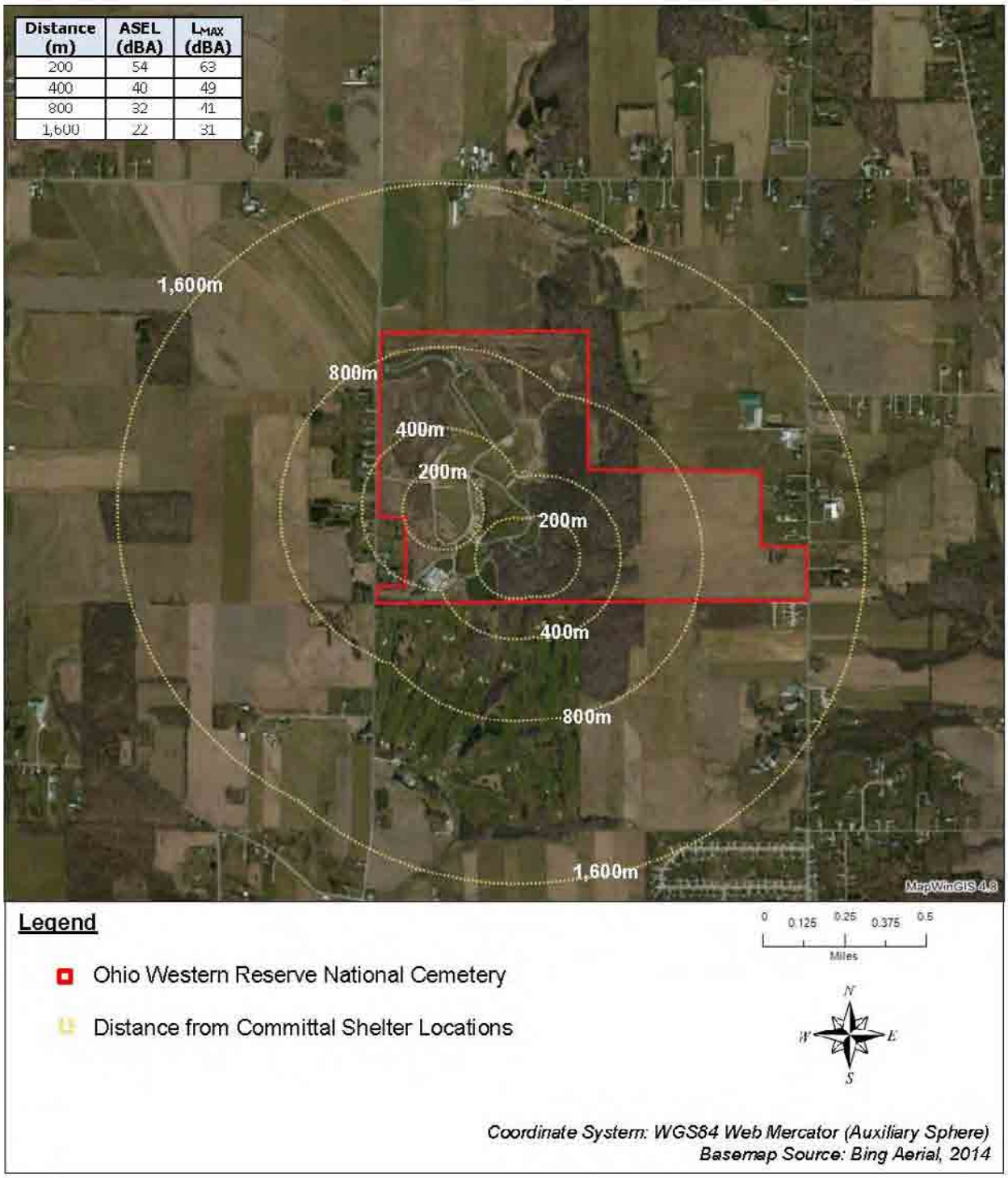
Predicted noise impacts for the Alternative Action would be the same as those for the Proposed Action, but would predominantly be located in the western portion of the cemetery. Figure 3-6 depicts the predicted ASEL and $L_{MAX}$ at various distances from the two existing committal shelter locations and the new committal shelter location under the Alternative Action.

Aside from residences neighboring the cemetery property, other noise-sensitive receptors would not be affected under the Alternative Action due to their distance from the cemetery.

#### 3.7.2.3 No Action

Under the No Action Alternative, cemetery expansion would not occur, and no additional noise impacts would result. Ceremonial M-16 rifle salutes would continue until cemetery capacity is reached, and grounds maintenance activities would continue thereafter.

## Figure 3-6. Estimated M-16 Blank Noise Levels, Alternative Action




| Distance (m) | ASEL (dBA) | $L_{MAX}$ (dBA) |
|---|---|---|
| 200 | 54 | 63 |
| 400 | 40 | 49 |
| 800 | 32 | 41 |
| 1,600 | 22 | 31 |

# 3.8 Land Use

## 3.8.1 Existing Environment

The 1992 cemetery development EIS examined the area's land uses prior to site acquisition (VA 1992). Following site acquisition, cemetery operations (including burials and related site operations) commenced on approximately 65 acres of the site. The two areas under consideration for cemetery expansion have largely been undisturbed, allowing native vegetation to grow. A portion of the eastern cemetery property (east of Tommy Run) is leased for agricultural production. As is the case at all national cemeteries, the property is reserved for public use only for funeral services, visitation, and occasional ceremonies. No recreational use is permitted.

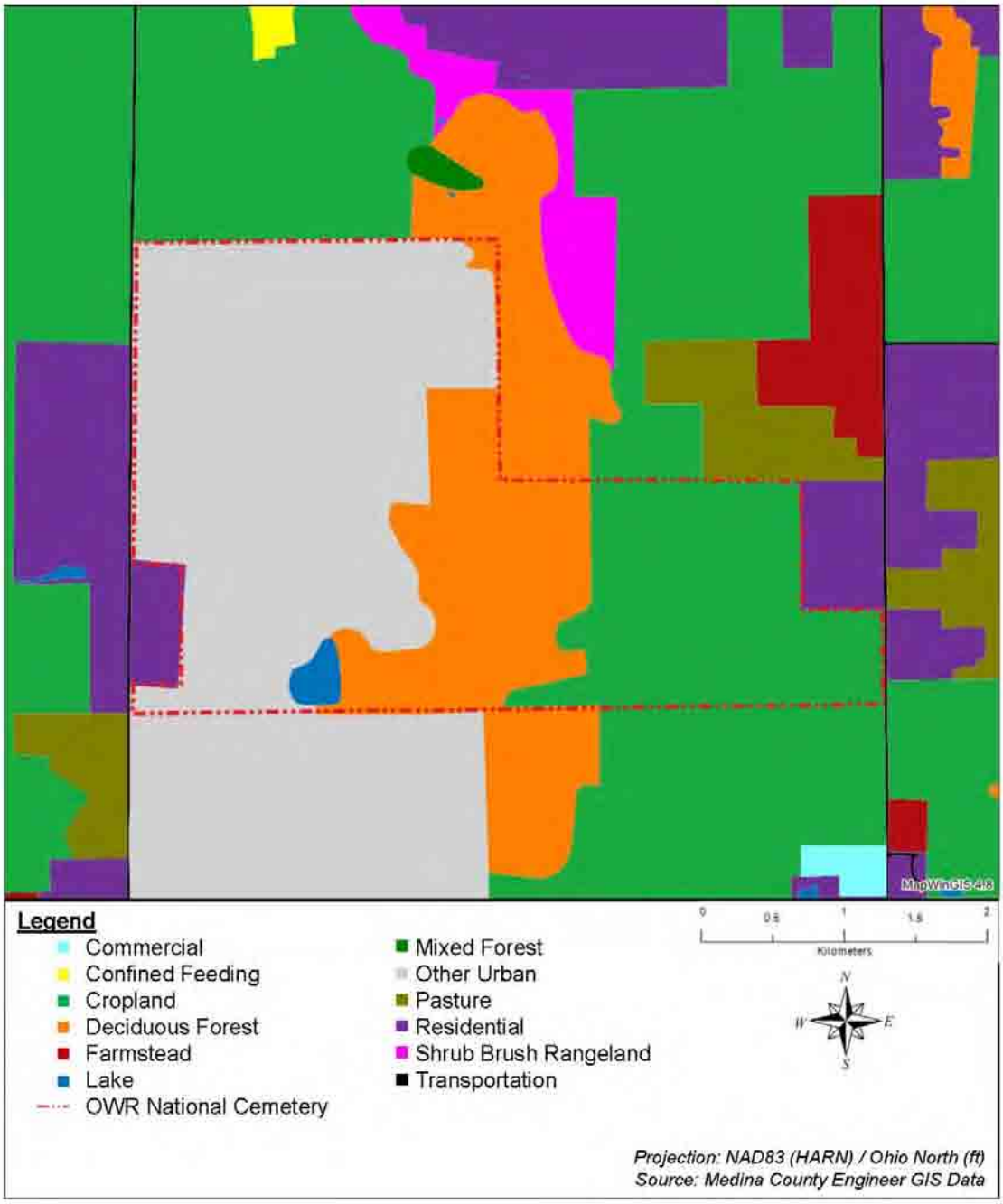
Six oil and gas wells were located on the property at the time of acquisition by VA. All six wells have since been removed from service and plugged. No wells are located in the northeastern project area. One well was previously located in the western project area.

Spectra Energy Corp. is planning for the Nexus natural gas pipeline, a large-diameter pipeline designed to transport 1.5 to 2 billion cubic feet of natural gas per day. The pipeline is initially proposed to extend from Kensington in northeastern Ohio to the Detroit area in southeastern Michigan, with capacity for additional connections or expansion (Spectra 2015). The study corridor for the right-of-way passes through the Rittman area of Medina County. Ohio Western Reserve National Cemetery has been informally told that the pipeline would not enter the property boundary, and VA is in the process of requesting formal and official confirmation of this statement.

Land uses surrounding the cemetery property are largely agricultural, with some low-to-medium density residential areas located adjacent to the western and eastern property boundaries. The Rawiga Golf and Swim Club is located adjacent to the southern property boundary.

Medina County maintains land use designations, including the area surrounding the cemetery property. Figure 3-7 depicts these land use designations (Medina County 2014a).

**Figure 3-7. Medina County Land Use Designations in Area of Ohio Western Reserve National Cemetery**




## 3.8.2 Environmental Consequences

### *3.8.2.1 Proposed Action*

The Proposed Action would occur within the current cemetery property, developing an unmanaged area for in-ground burials, a columbarium, and small site structures. Continued development of sections of the cemetery is compatible with the majority land use designation of mixed urban. The edge of a relatively

undisturbed woodland to the east of the NCA property extends from 20 to 200 feet into the northeast corner and part of the southeast border of the proposed expansion area, and would be pushed back along some of its length where needed to accommodate site development, but the wooded areas would be preserved to the extent possible. There would be minimal land use impacts as a result of the Proposed Action.

#### *3.8.2.2 Alternative Action*

The Alternative Action would occur within the current cemetery property, entirely within the area designated as mixed urban. There would be no land use impacts as a result of the Alternative Action.

#### *3.8.2.3 No Action*

Under the No Action Alternative, cemetery expansion would not occur, and no land use impacts would result.

## 3.9 Floodplains, Wetlands, and Coastal Zone Management

### 3.9.1 Existing Environment

The Ohio Western Reserve National Cemetery is predominantly located in an upland area that is bisected from north to south by Tommy Run, a perennial creek. The developed cemetery and the areas proposed for expansion are labeled as Zone X, unshaded; that is, they are not within any flood hazard zone mapped by the Federal Emergency Management Agency (FEMA). The wooded riparian area immediately adjacent to Tommy Run is within the 100-year flood zone (Zone AE or 1 percent annual chance flood hazard), with small pockets in the 500-year flood zone (Zone X, shaded), or 0.2 percent annual chance flood hazard (FEMA 2015). The upland area adjacent to Tommy Run slopes steeply toward the drainage; therefore, the designated flood zones are located in close proximity to Tommy Run. Figure 3-8 shows the location of the flood zones.

NCA commissioned a Wetland Determination Report of the proposed project area, for which the field survey was conducted in July 2014 (SmithGroup JJR 2014a). The purpose of the assessment was to identify potential wetland areas that would be regulated under the jurisdiction of the U.S. Army Corps of Engineers (USACE) under Section 404 of the *Clean Water Act*, or the Ohio EPA under Ohio Revised Code Chapter 6111. Six wetland areas (A–F) ranging from 0.02 to 0.24 acres (totaling 0.55 acres) were identified during the field survey of the cemetery property (Figure 3-9). USACE has determined that these are isolated wetlands and are not jurisdictional waters of the United States (USACE 2015).

The alternative project area in the western portion of the cemetery property includes a more prominent drainage area. The field survey identified two wetland areas (G and H) of 0.77 acres and 1.39 acres (totaling 2.16 acres) (Figure 3-9).

Medina County is not one of the nine counties subject to the Ohio Coastal Management Program (ODNR 2007); therefore, the resource issue of coastal zone management is not discussed further in this EA.

## Figure 3-8. Designated Flood Zones

**Figure 3-9. Surveyed Wetland Boundaries**

Source: SmithGroup JJR 2014b.

## 3.9.2 Environmental Consequences

### *3.9.2.1 Proposed Action*

Expansion activities would not occur within the FEMA designated flood zones of Tommy Run on the cemetery property, causing no adverse impacts.

Construction for the cemetery expansion and improvements would disturb three of the six wetlands (A, B, and E) from excavating, grading, and filling that portion of the cemetery property. USACE has made a determination that these wetlands are intrastate, isolated, non-navigable waters according to 33 CFR 328.3(a)(3) and therefore are not jurisdictional waters of the U.S. subject to Section 404 of the *Clean Water Act* (Robinette 2015).

Isolated wetlands are considered waters of the State of Ohio and are regulated by the Ohio EPA, Division of Surface Water, Section 401 Wetlands and Streams Permitting Section. The individual wetlands, totaling 0.47 acres, are Category 1 (that is, they provide minimal wildlife habitat, minimal hydrological and recreation function, and are hydrologically isolated). As the potential impact to the three affected wetlands is less than 0.5 acres, a Level One Isolated Wetland Permit (complying with the Section 401 Water Quality Certification) would be required.

Creating and establishing new site drainages would likely support hydrophytic vegetation, and eventually develop into new wetland areas. Because of the locations and small sizes of the wetlands, it would be difficult to avoid filling the wetlands during construction. Wetland F located along the north edge of the cemetery boundary could possibly be avoided. Measures to minimize impact to the wetlands are described in Section 5.0.

### *3.9.2.2 Alternative Action*

Expansion activities would not occur within the FEMA designated flood zones of Tommy Run on the cemetery property, causing no adverse impacts.

Construction for the cemetery expansion and improvements would disturb two wetlands (G and H) (Figure 3-9) from excavating, grading, and filling the western portion of the cemetery property. Although these wetlands were mapped during the field survey, they were not addressed in the December 2014 Wetland Determination Report submitted to USACE. However, their characteristics are similar to those in the Proposed Action area, and would also likely be determined isolated and therefore not jurisdictional waters of the U.S. subject to Section 404 of the *Clean Water Act*.

The isolated wetlands would be considered waters of the State of Ohio and regulated by the Ohio EPA, and would require an isolated wetland permit similar to the Proposed Action.

The wetlands would be filled and shaped to create a pond and to facilitate drainage through the expansion area (Figure 2-2). The improvements to the drainage and creation of an open water source would likely support hydrophytic vegetation and eventually develop into a new wetland area. Measures to minimize impact to the wetlands are described in Section 5.0.

### *3.9.2.3 No Action*

Under No Action, cemetery expansion would not occur, and no impacts to floodplains or wetlands would result.

# 3.10 Socioeconomics and Environmental Justice

## 3.10.1 Existing Environment

The following paragraphs update the summary socioeconomic data provided in the 1992 EIS, based on current data (Ohio OPRSP 2014).

About 38% of the 422 square miles covered by Medina County is devoted to farming. Total county farm acreage is 94,978, with an average of 103 acres per farm. The 2013 population was estimated as 174,915, an increase of 46% over the 1988 population that served as the basis for the 1992 analysis. Per capita income in 2012 was $43,446, a 257% increase since 1988. The largest employment sectors in 2012, in decreasing order, were trade/transportation/utilities, manufacturing, professional and business services, education and health services, local government, leisure and hospitality, construction, financial services, other services, information, federal government, natural resources and mining, and state government. Since 2007, goods-producing sectors experienced an overall 4.2% decrease in employment and service-producing sectors experienced an overall 1.7% decrease. Federal, state, and local governments experienced decreases of 17.1%, 31.5%, and 8.2%. The unemployment rate improved from 8.1% in 2009 to 6.5% in 2013.

The county had 331 physicians in 2013, or 1 for every 528 people, much steeper than the ratio of 1 physician per 88 residents reported for 1988. There are still three hospitals, now with a total of 263 beds (compared to 268 beds in the 1992 analysis), and 12 licensed nursing homes with 1,078 beds (compared to the previous total of 1,340 nursing home beds at 19 nursing homes).

## 3.10.2 Environmental Consequences

### *3.10.2.1 Proposed Action*

Under the Proposed Action, existing cemetery operations would continue for an additional 10 years, causing no changes to population, income levels, housing, local tax revenue, or environmental justice issues. A minor and temporary increase in employment could occur if the contractor that would be retained to develop the expansion area hires additional local crew members, resulting in a possible short-term localized beneficial impact to employment.

### *3.10.2.2 Alternative Action*

The socioeconomic impacts would be the same as under the Proposed Action, with no adverse impacts and a possible short-term localized beneficial impact to employment during construction activities.

### *3.10.2.3 No Action*

Under No Action, cemetery expansion would not occur, and no adverse or beneficial impacts to socioeconomic conditions or environmental justice would result.

# 3.11 Community Services

## 3.11.1 Existing Environment

The Ohio Western Reserve National Cemetery has provided burial services for Veterans and their families in the Cleveland (north-central Ohio) region for the past 15 years, since 2000. The cemetery's current capacity would be reached as soon as late 2015.

Other community services include police protection, fire protection, emergency services, schools, health care, and parks and recreation. Because no additional load is expected to be placed on the fire or police departments, and changes are not expected in use of or access to other public or community services as a result of the expansion of burial areas at the national cemetery, impacts to community services other than Veterans burial services were not analyzed in this EA.

### 3.11.2 Environmental Consequences

#### *3.11.2.1 Proposed Action*

Under the Proposed Action, existing cemetery operations would continue for an additional 10 years, allowing NCA to continue providing burial services to Veterans and their families in the region. Therefore, the Proposed Action would provide a continuing beneficial impact.

#### *3.11.2.2 Alternative Action*

Under the Alternative Action, existing cemetery operations would continue for an additional 10 years, allowing NCA to continue providing burial services to Veterans and their families in the region, thus providing a continuing beneficial impact.

#### *3.11.2.3 No Action*

Under No Action, existing cemetery operations would cease when existing capacity is reached, projected to be as soon as late 2015 for some burial options. The Ohio Western Reserve National Cemetery is in Rittman, OH, about 45 miles south of Cleveland, and serving Veterans throughout northern Ohio. In order for these Veterans to be provided the honor and earned privilege of burial in a national cemetery, families and friends would have to travel to Dayton, OH (180 miles southwest of Rittman), Holly, MI (230 miles northwest of Rittman), or Bridgeville, PA (130 miles southeast of Rittman). For families to visit the cemeteries after a burial, a roundtrip distance of 260 or more miles can prove to be prohibitive. No Action would have an adverse effect on Veterans burial services.

## 3.12 Solid Waste and Hazardous Materials

### 3.12.1 Existing Environment

Solid waste is generated by cemetery operations on a routine basis. Solid waste generally consists of routine office waste, flowers and other items left behind at burial sites, and container waste associated with minor vehicle maintenance activities. Solid waste is collected weekly and transferred to a municipal solid waste landfill outside of the Medina County Solid Waste Management District.

Minimal quantities of hazardous materials are stored at the cemetery. Typically, hazardous materials are brought onsite by contractors on an as-needed basis for activities such as pest control, weed management, and road deicing. The cemetery maintains a contract (currently with Safety-Kleen) for disposal of routinely generated used oils. Spent vehicle batteries are exchanged and recycled.

Small volumes of excess soils are generated consistent with burial operations. These soils are reutilized onsite where possible. Small volume storage of excess soils is not visible from areas outside of the cemetery or areas frequently traveled by cemetery visitors.

### 3.12.2 Environmental Consequences

#### *3.12.2.1 Proposed Action*

Construction-related activities under the Proposed Action have the potential to generate solid waste. However, solid waste generation from these activities is anticipated to be a minor contributor to overall solid waste generation in the region and would not result in adverse impacts. Excavated soils would be reutilized onsite in accordance with site design specifications. Excess soils could be reutilized offsite. Although a scoping comment indicated that it would be preferable to retain excess soils onsite, NCA determined that maintaining spoils piles was not anticipated, as the future need for excess soils is limited, and management of excess soils presents an environmental management challenge due to undesirable aesthetics, erosion of relatively loose soils in runoff, and high potential to be colonized by invasive plants and noxious weeds. Staging and operation of construction equipment carries an increased potential for incidental releases of vehicle fluids. Proper vehicle maintenance and inspection would reduce this potential, and adverse impacts are not expected.

Continuation of cemetery operations under the Proposed Action would generate similar amounts of solid waste as current operations. Current and future solid waste generation would be a minor contributor to overall solid waste generation in the area and would not result in adverse impacts. Pesticide application and road maintenance would be expanded to the new operational areas, but would continue to be serviced by contractors in accordance with material specifications and would not result in adverse impacts.

#### *3.12.2.2 Alternative Action*

Predicted solid waste and hazardous materials impacts for the Alternative Action would be the same as those for the Proposed Action.

#### *3.12.2.3 No Action*

Under No Action, cemetery expansion would not occur, with no construction-related solid waste and hazardous material generation. As cemetery interments are reduced and eventually ended once the cemetery has reached capacity, solid waste generation would decrease somewhat.

## 3.13 Transportation and Parking

### 3.13.1 Existing Environment

The Ohio Western Reserve National Cemetery is located in a rural portion of Medina County. The cemetery is accessed by both employees and visitors from Rawiga Road on the western side of the property. The main entrance to the cemetery is located at the northwestern portion of the property, and the employee entrance is located at the southwestern portion of the property.

At present, the cemetery employs 13 full-time staff, with additional contract personnel accessing the site. Approximately 10 burials per day occur at the cemetery. While the number of visitor vehicles accessing the site for each service varies, between 10 and 20 vehicles for each service is typical. Burial services are commonly scheduled throughout the day and do not typically coincide with peak morning and evening travel times.

Vehicle traffic along Rawiga Road in the vicinity of the cemetery is typically associated with cemetery visitations and operations and personal travel by area residents. A 2007 traffic count for Rawiga Road in the vicinity of the cemetery returned an average daily traffic count (24 hours, both directions) of approximately 450 vehicles (NOACA 2010).

Ample parking for cemetery staff is accessible from the cemetery's employee entrance. Short-term vehicle parking for cemetery visitors is available in dedicated bump-out parking locations and along cemetery roadsides.

## 3.13.2 Environmental Consequences

The 1992 cemetery development EIS concluded that the impact of a national cemetery on day-to-day transportation is minimal. Operation of the cemetery to date has not resulted in significant impacts to the area transportation network.

### *3.13.2.1 Proposed Action*

Construction-related activities under the Proposed Action would result in a short-term adverse impact to the transportation network in the immediate cemetery vicinity. During construction, an increase in the number of vehicles (including both trucks and personal vehicles) would occur. Construction-related activities could be scheduled to avoid local impacts during peak travel times. A dedicated temporary construction access would be created on the northern cemetery boundary to minimize traffic impacts to ongoing cemetery operations. Improvements to the entrance lanes and cortege assembly area near the Public Information Center will provide more capacity for vehicles in funeral processions.

While the Proposed Action would allow continued interments at the cemetery, the rate of interments is not expected to increase from current conditions. As such, operational-related increases in traffic are not expected. The Proposed Action would construct additional roadways and bump out parking areas, thereby accommodating additional parking for cemetery visitors.

Scoping questions for this EA included the whether there would still be only one entrance and if exit-only points could be provided when large ceremonies are held to assist in traffic exiting the cemetery. NCA has determined that the existing main entrance would continue to serve as the single permanent public access, for site security purposes and because the infrequent nature of higher traffic events (approximately four per year) is not enough to justify a budget request to construct another entrance.

Short-term adverse transportation impacts could be minimized through construction scheduling. This minimization opportunity is described in Section 5.0.

### *3.13.2.2 Alternative Action*

Predicted transportation and parking impacts for the Alternative Action would be the same as those for the Proposed Action.

Short-term adverse transportation impacts could be minimized through construction scheduling. This minimization opportunity is described in Section 5.0.

### *3.13.2.3 No Action*

Under No Action, cemetery expansion would not occur, and no transportation or parking impacts would result. As cemetery interments are reduced and eventually ended once the cemetery has reached capacity, traffic to and from the cemetery would decrease, resulting in a slight but beneficial impact to the local transportation network.

# 3.14 Utilities

## 3.14.1 Existing Environment

Electricity is supplied to the Ohio Western Reserve National Cemetery from First Energy Electric. Primary electricity consumption is at the Administration and Maintenance Complex, with additional consumption at the Public Information Center and two Committal Shelters (minimal lighting). The Administration and Maintenance Complex and the Public Information Center are heated by natural gas supplied by Columbia Gas.

The cemetery is located within the Rittman, OH, city limits, and the Administration and Maintenance Complex and the Public Information Center are connected to the city's potable water system. The City of Rittman's comments on the Draft EA cited a concern for the chlorine level in the 12-inch main supplying the cemetery dissipating before the water is consumed, associated with the cemetery's water use rate being lower than anticipated. However, the *City of Rittman Drinking Water Consumer Confidence Report for 2014* shows that residual disinfectants (chlorine) and disinfection byproducts (total trihalomethanes) are within their respective acceptable range (Rittman 2015).

Sanitary wastewater generated at the Administration and Maintenance Complex and the Public Information Center is dispositioned via a septic system located on the cemetery property.

Stormwater runoff from impervious surfaces on the cemetery property is captured and reused for landscape irrigation as needed. Irrigation is typically required May through September to maintain landscape vegetation.

The cemetery is also connected to telephone and internet service from local providers.

## 3.14.2 Environmental Consequences

### *3.14.2.1 Proposed Action*

The Proposed Action includes extending utility services, with the cooperation of local utility providers, to a new committal shelter. The new committal shelter would be served by electric utilities to provide lighting and small electric heating capabilities inside the structure, and telephone communications would be installed.

Utility usage at the new committal shelter would be insignificant compared to regional utility usage and would not have adverse impacts on utility suppliers.

Impacts associated with installation of a new groundwater well are described in Section 3.5. A scoping comment noted frustration that the cemetery property's original jurisdiction was transferred to the City of Rittman so that the cemetery could connect to Rittman's municipal water supply, but now groundwater may be accessed anyway to provide some of the cemetery's requirements (irrigation water required by the expansion). A related comment conceded that using municipal water for irrigation is a big expense. Collection and reuse of surface runoff for site irrigation minimizes the need for municipal water irrigation supplies. The availability of groundwater for irrigation use could decrease NCA's municipal water consumption for refilling irrigation ponds. However, the City of Rittman indicated that the cemetery has not needed to replenish this volume very often given the regional weather, so little to no change to the municipal water consumption rate is expected if some or all of the cemetery's irrigation pond refill volume is drawn from a groundwater supply.

#### *3.14.2.2 Alternative Action*

Predicted impacts to utilities for the Alternative Action would be the same as those for the Proposed Action.

#### *3.14.2.3 No Action*

Under No Action, cemetery expansion would not occur, and no impacts to utilities would result. As cemetery interments are reduced and eventually ended once the cemetery has reached capacity, cemetery staffing could be reduced, and utility usage would decrease somewhat.

## 3.15 Cumulative Impacts

The CEQ regulations for implementing NEPA define cumulative effects as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time" (40 CFR 1508.7). This EA considers past, present, and reasonable foreseeable short-term and long-term future effects from implementing the Proposed Action and other projects that coincide with the location and timetable of the Proposed Action.

Projects and activities in the vicinity of the national cemetery include a proposed natural gas pipeline and ongoing operation of the adjacent public golf and swim club:

- As described in Section 3.8.1, the study corridor for the Nexus large-diameter natural gas pipeline passes through the Rittman area of Medina County. Ohio Western Reserve National Cemetery has been informally told that the pipeline would not enter the property boundary; however, the pipeline's presence could change nearby land use that could be adjacent to or within the view of the cemetery, depending on the pipeline's specific routing. The proposed cemetery expansion would not contribute to or increase any of the aesthetic, land use, socioeconomic, or other impacts that could be associated with the pipeline.
- The Rawiga Golf and Swim Club is located immediately south of Ohio Western Reserve National Cemetery. Previously a private club, this facility has operated at this location since 1959. It currently includes an 18-hole golf course, practice area, golf shop, clubhouse, banquet hall, and swimming pool. The golf course is adjacent to the cemetery's administration and support facilities. Continuing operation of the golf and swim club, concurrent with the construction and operation of the Proposed Action, would not have any measurable cumulative impact to the local environment.

Given the nature and location of the Proposed Action within the current cemetery property boundary and its nature as a simple 10-year continuation of current cemetery operations, no significant cumulative adverse effects to any resources are anticipated.

## 3.16 Potential for Generating Substantial Controversy

NCA has solicited input from various federal, state, and local government agencies regarding the Proposed Action. None of these agencies expressed opposition to the Proposed Action. These agencies were also given an opportunity to comment on the Draft EA, with their input incorporated into this Final EA.

During scoping for this EA, several residents living adjacent to the cemetery actively participated in a discussion about the proposed expansion. Questions about the proposed project and about ongoing cemetery operations were asked and answered by NCA staff. No areas of controversy were identified.

# 4.0 AGENCY COORDINATION AND PUBLIC INVOLVEMENT

## 4.1 Agency and Tribal Coordination

During development and review of the EA for expansion and improvements at Ohio Western Reserve National Cemetery, NCA contacted federal, state, and local agencies with oversight responsibilities related to this project. Table 4-1 lists the coordination and consultation activities conducted to date in support of this EA.

**Table 4-1. Agency and Tribal Coordination for Expansion and Improvements at Ohio Western Reserve National Cemetery**

| Entity | Coordination and Input |
|---|---|
| U.S. Fish and Wildlife Service – Midwest Region, Columbus Ohio Field Office | NCA sent a letter pursuant to consultation required by Section 7 of the *Endangered Species Act* on February 12, 2015, formally presenting the assessment and findings, and requesting FWS concurrence with a conclusion of no adverse effect to federally protected species. |
| U.S. Army Corps of Engineers – Huntington District, North Branch-Regulatory Division | NCA shared the draft Wetland Determination Report with USACE and representatives from NCA, USACE, and the wetlands investigation contractor visited the cemetery to view the site together.<br><br>NCA submitted the final report to USACE for concurrence with the findings that there are no jurisdictional and only isolated wetlands on the proposed project site.<br><br>The North Branch office concurred with this finding in an email on February 3, 2015; final formal concurrence via letter was received on February 6, 2015. |
| Ohio History Connection (Ohio State Historic Preservation Office) | Representatives from NCA, SHPO, and the cultural resources contractor visited the cemetery to view the site and its environs together. NCA described the proposed project for SHPO. SHPO provided an informal preliminary conclusion that historic properties would not be adversely affected by the proposed undertaking.<br><br>NCA sent a letter report pursuant to consultation required by Section 106 of the *National Historic Preservation Act* on January 26, 2015, formally presenting the assessment and findings and requesting SHPO concurrence with a conclusion of no adverse effect to historic properties. |
| Ohio Department of Natural Resources, Division of Wildlife | In response to a request during preparation of the Draft EA, the Division of Wildlife confirmed in a letter dated April 15, 2015, that they have no record of any of the following within a one-mile radius of the cemetery: rare or endangered species, unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forests, national wildlife refuges, parks or forests, or other protected natural areas. |
| Ohio Environmental Protection Agency | In a letter dated, March 15, 2015, Ohio EPA identified the requirement for NCA to apply for and receive a state Isolated Wetland Permit before impacting the isolated wetlands on the proposed project site.<br><br>NCA is in the process of drafting the required permit application and identifying an associated wetland mitigation bank commitment that will offset and minimize the impact to wetlands from the Proposed Action. The permit application will be submitted to Ohio EPA for approval. |
| Natural Resource Conservation Service – Medina Service Center | VA and NRCS jointly completed a Farmland Conversion Impact Rating Form (Form AD-1006) that assigned a relative value and site assessment score of 120 points. As the total score was less than 160 points, the site does not require further consideration for protection, and the impact to prime and unique farmland is not considered significant. |

| Entity | Coordination and Input |
|---|---|
| Delaware Nation, Oklahoma<br><br>Forest County Potawatomi Community, Wisconsin<br><br>Hannahville Indian Community, Michigan<br><br>Ottawa Tribe of Oklahoma<br><br>Wyandotte Nation, Oklahoma | NCA sent a letter report on February 19, 2015, to each federally recognized tribe identified as having current or historical ties to this location, presenting the assessment and finding of no adverse effect to historic properties, and inviting tribal input and feedback to the assessment and the NEPA process. |

Federal, state, local, and tribal entities (in addition to those listed above) to which the Draft EA was provided for review and comment are as follows:

- U.S. Environmental Protection Agency, Region 5
- Ohio Environmental Protection Agency
- Ohio Department of Natural Resources
- Ohio Department of Veterans Services
- Akron Regional Air Quality Management District
- Medina County Department of Planning Services
- Medina County Engineers
- Medina County Soil and Water Conservation District
- Medina County Veterans Service Office
- City of Rittman Mayor
- City of Rittman Municipal Manager

Comments on the Draft EA were received from U.S. EPA Region 5, the Ohio State Historic Preservation Office, and the City of Rittman City Manager. These comments and corresponding responses are summarized in Section 4.2.2.

## 4.2 Public Involvement

As stated in the VA's *NEPA Interim Guidance for Projects* (VA 2010), public involvement for an EA may include public engagement during scoping and drafting and finalizing the EA through publication of notices or public meetings. The public involvement process for this EA has consisted of a scoping period with a public scoping meeting, publication of a Notice of Availability of the Draft EA, a public comment period on the Draft EA, consideration of the public comments in this Final EA, and publication of a Notice of Availability of this Final EA and FONSI.

## 4.2.1 Scoping

### *4.2.1.1 Scoping Process*

Scoping is an early and open process for determining the scope of issues to be addressed in a NEPA document, and for identifying the significant issues related to a proposed action (40 CFR 1501.7).

Postcards were mailed to 60 local residents and landowners notifying them of the scoping process, a public scoping meeting, and options for submitting scoping comments on the Proposed Action. This information was also published in the local newspaper recommended by cemetery personnel, the weekly *North Wayne Post*, on December 6, 2014. Because this paper only published on Saturdays, the notice was also published in the *Akron Beacon Journal* on December 7, 2014.

A public scoping meeting was held at the Administration Building at Ohio Western Reserve National Cemetery on Tuesday, December 16, 2014, at 7 p.m. Nine individuals attended the meeting. Posters displayed the NEPA process, the cemetery location within the region, the purpose of and need for the proposed action, the existing site layout, and the Proposed Action. Mr. Glenn Elliott, VA Office of Construction & Facilities Management, facilitated the meeting. The meeting opened with a presentation that offered further details on the NEPA process and the proposed project, and then the floor was opened for members of the public to offer verbal scoping comments. Audio was recorded with double redundancy by the EA contractor and transcribed for the project file.

### *4.2.1.2 Summary of Scoping Comments*

All nine individuals in attendance at the meeting participated in the scoping meeting discussion by asking questions and providing input. No written comment forms were submitted during the meeting, nor were any comments received through the mail or at the published email address. Table 4-2 summarizes the scoping comments. All comments are given equal weight in this EA regardless of whether they were mentioned once or mentioned several times. The responses to the comments are integrated into this EA.

**Table 4-2. Summary of Scoping Comments**

| Comment | Response | Section |
|---|---|---|
| ***Proposed Action*** | | |
| Disappointed that proposed improvements do not include at least partial enclosure and heating of committal shelter for comfort during services in cold or windy weather. | NCA committed to discuss this with the VA design team during detailed project design. | 2.2.1 |
| Would NCA consider selling the timber from any trees cut to help with recouping costs? | This activity is not anticipated due to the administrative requirements related to the federal government selling property compared to the very limited amount of trees that would be removed by selective clearing. | 2.2.1 |
| Will the public be able to use the restrooms in the honor guard buildings during funerals? | Construction of a new honor guard building has been removed from the Proposed Action. Regarding the existing honor guard building, as a matter of policy, public restroom use is limited to the welcome center to ensure that facility hygiene is maintained. | NA |

| Comment | Response | Section |
|---|---|---|
| ***Aesthetics*** | | |
| Request to address unmanaged vegetation along Rawiga Road. | The cemetery has just obtained equipment that will ensure they are able to mow this area on at least a monthly basis beginning in spring of 2015. | 3.1.1 |
| Night time lighting was discussed; residents value the darkness. | No new nighttime lighting is proposed. | 3.1.2.1 |
| Opinion was expressed that the berms were not visually desirable. | NCA has no current plan to remove the berm. | 3.1.1 |
| ***Geology and Soils*** | | |
| Concern about offsite disposal of soil. | Soils generated during excavation would be reutilized in areas requiring fill material or transported offsite. | 3.4.2.1 |
| ***Hydrology and Water Quality*** | | |
| Potential impacts on residential groundwater supply from cemetery use of groundwater for irrigation. | The new groundwater supply well would be sited and operated, in consultation with appropriate contractors and regulatory agencies, to have minimal impacts on existing groundwater users. | 3.5.2.1 |
| ***Noise*** | | |
| Neighbors have avoided noisy activities on adjacent land (chainsaws, shooting clay pigeons, others), on weekdays through late afternoons out of respect for potential burials. This project appears to go right up to the fenceline; will horse-riding or other activities on adjacent land disturb services, and will tree removal increase the potential for this to be a concern? | Due to limited and selective tree removal and installation of new landscaping, this is not expected to be an issue. | 3.7.2 |
| ***Land Use*** | | |
| During original cemetery construction, the residents were told that there would be a walking path that was never constructed. | As is the case at all national cemeteries, the property is reserved for public use only for funeral services, visitation, and occasional ceremonies. No recreational use is permitted. | 3.8.1 |
| Is the proposed commercial Nexus pipeline going to cross the cemetery? | Ohio Western Reserve National Cemetery has been informally told that the pipeline would not enter the property boundary, and VA is in the process of requesting formal and official confirmation of this statement. | 3.8.1 |

| Comment | Response | Section |
|---|---|---|
| ***Transportation and Parking*** | | |
| Will there still be only one entrance? | NCA has determined that the existing main entrance would continue to serve as the single permanent public access, for site security purposes and because the infrequent nature of higher traffic events (approximately four per year) is not enough to justify a budget request to construct another entrance. | 3.13.2.1 |
| Could exit-only points be provided when large ceremonies are held to assist in traffic exiting site? | | |
| ***Utilities*** | | |
| Cemetery property was ceded to the City of Rittman so that Rittman could supply municipal water, but now groundwater may be accessed anyway. | The proposed groundwater supply well would only be used for seasonal irrigation, typically required between May and September. | 2.2.1<br>3.5.2.1 |
| Using municipal water for irrigation is a big expense. | Collection and reuse of surface runoff for site irrigation currently minimizes the need for municipal water irrigation supplies. A groundwater irrigation supply well is part of the Proposed Action. | 2.2.1<br>3.5.2.1<br>3.14.2.1 |
| ***NEPA Process*** | | |
| All scoping meeting attendees stated that the postcards were the only means by which they heard about the meeting. | NCA will continue to include postcard mailings in the public notification approaches for this EA. | 4.2.1.1 |

### 4.2.2 Public Review of Draft Environmental Assessment

The VA's NEPA guidance states that the EA process must include at least a 30-day public comment period on the Draft EA, which starts with the publication of a Notice of Availability (NOA). The NOA for the Draft EA was published in the *North Wayne Post* weekly newspaper on April 18, 2015 and in the *Akron Beacon Journal* on April 19, 2015. In addition, postcards notifying the public, agencies, and tribes of the availability of the Draft EA were mailed to the individuals notified of the scoping meeting and the agencies and tribes listed in Section 4.1. The comments received on the Draft EA have been considered in this Final EA. Comments were received from three federal, state, and local agencies (see Section 4.1). No comments were received from members of the public or tribal representatives. Comments on the Draft EA are summarized in Table 4-3.

**Table 4-3. Summary of Comments on Draft EA**

| Comment | Response | Section |
|---|---|---|
| ***Proposed Action*** | | |
| The City of Rittman has an existing ordinance banning water wells being put in when city water lines are located within and on the property. Comment letter included text of ordinance section "961.05 Water Tap-In Policy; Exemptions". | NCA determined that the ordinance is not applicable, and has added a discussion of this topic to the description of the Proposed Action. | 2.2.1 |
| ***Cultural Resources*** | | |
| Based on the documentation received by SHPO and analysis in the EA, SHPO concurs that there will be no historic properties affected by this undertaking. | The discussion of Best Management Practices and Monitoring has been revised to include the statement that, as requested by SHPO, NCA will notify SHPO if new or additional effects or historic properties are identified. | 5.0 |
| ***Hydrology and Water Quality*** | | |
| There is no discussion on the potential chemical impacts on the environment and surrounding community from the burial operations and the practice of embalming. The Final EA should provide some discussion on current day embalming practices, the chemicals from embalming that could impact groundwater and surface water, as well as the fate and transport of those chemicals in the environment. | The requested discussion has been added to the Final EA. | 3.5.2.1 |
| ***Utilities*** | | |
| When Ohio Western Reserve Cemetery was built, a 12-inch main to the facility was put in for consumption and to fill the irrigation pond. With the weather in NE Ohio, it is understood that the existing irrigation pond has not needed to be replenished very often, and the few employees that are assigned to the facility have not use the water as much as expected, which causes concern for the chlorine level in the 12-inch main to dissipate before it is being used for consumption. If the Western Reserve Cemetery would continue to put in [a well for] water for irrigation, this problem will continue and be even more prevalent with the chlorine dissipation problem. | Impacts due to the consumption rate of city water associated with initial cemetery development and operations are not within the scope of this EA, but these conditions do define the baseline (Affected Environment) for this analysis. The city's concern has been noted and considered in the impact analysis for Utilities. | 3.14.1, 3.14.2.1 |

## 4.2.3 Availability of Final EA and FONSI

The NOA for the Final EA and FONSI was published in the *North Wayne Post* weekly newspaper on August 15, 2015 and in the *Akron Beacon Journal* on August 16, 2015. In addition, postcards notifying the public, agencies, and tribes of the availability of the Final EA and FONSI were mailed to the

individuals notified of the scoping meeting and Draft EA availability, and the agencies and tribes listed in Section 4.1.

# 5.0 BEST MANAGEMENT PRACTICES AND MONITORING

The best management practices, impact minimization techniques, and monitoring opportunities to maintain the impacts of the Proposed Action at acceptable levels are described below.

## *Aesthetics*

Short-term impacts could be minimized through implementation of the following:

- Conduct construction activities with a sensitivity toward maintaining the dignity and solemnity of the national cemetery environment during interment services.

## *Air Quality*

Short-term air quality impacts could be minimized through implementation of the following:

- Use appropriate dust control methods during construction activities. Dust control methods include water sprays, chemical soil additives, and wheel washers.
- Suspend construction activities during periods of high winds.
- Reduce vehicle speeds to reduce dust generated by vehicles and equipment on unpaved surfaces.
- Quickly re-vegetate exposed soils following completion of construction activities.

## *Cultural Resources*

As requested by SHPO, NCA will notify SHPO if new or additional effects or historic properties are identified.

## *Geology and Soils*

Short-term erosion and sedimentation impacts could be minimized through implementation of the following:

- Design, install, and maintain erosion and sediment controls during the duration of construction activities and any subsequent soil disturbance activities near site drainages. Such controls may include silt fences, runoff control berms, erosion control fabric, and rip-rap.
- Minimize the amount of exposed soils at any given time during construction activities. Quickly re-vegetate disturbed areas following completion of activities.
- Minimize the disturbance of steep slopes.
- Provide an undisturbed natural buffer between the activity area and surface drainages (namely Tommy Run), and direct stormwater runoff to vegetated areas.
- Develop a Stormwater Pollution Prevention Plan, consistent with the requirements of the NPDES general permit.
- Implement spill and leak prevention and response procedures.

## Hydrology and Water Quality

Short-term erosion and sedimentation impacts on hydrology and water quality could be minimized through implementation of the best management practices listed above for Geology and Soils. Additional impacts could be minimized through implementation of the following:

- Utilize native vegetation and drought-resistant vegetation for area landscaping to reduce irrigation requirements.
- Route stormwater runoff from impervious surfaces to stormwater retention and drainage areas.
- Implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the project area, to reduce the impacts of incidental releases of vehicle fluids.
- Engage contractors or regulatory agencies in locating the new groundwater well to minimize impacts to other groundwater users.
- Continue responsible use of pesticides and road deicing chemicals, keeping usage to the lowest quantities possible thereby reducing the potential for water quality impacts.

## Wildlife and Habitat

Less-than-significant effects could be further minimized by:

- Project or construction personnel would walk through the site immediately before initial clearing of an area. For clearing that occurs from April through July, issues to be identified during walk-through observations would include ground-nesting birds. For nesting sites discovered within active or imminent construction areas, nest protection practices would be developed in consultation with VA Office of Construction & Facilities Management environmental staff, on a case-by-case basis in consideration of nest location, bird species and habitat requirements, expected duration of nesting activity, and the location, type, and duration of construction activities (based on recommendations published by Rashin and Frye 2013).
- Any unavoidable tree removal would only occur between October 1 and March 31.
- Cemetery operations would continue the responsible use of pesticides and road deicing chemicals, keeping usage to the lowest quantities possible.

## Noise

Short-term and long-term noise impacts could be minimized through implementation of the following:

- Schedule construction activities for daylight hours, attempting to minimize impacts to ongoing cemetery operations.
- Maintain mufflers and sound shielding on construction equipment and routine maintenance equipment.
- Minimize equipment idling, and shut down construction equipment when not in use.

## Wetlands

Impacts to wetland areas from construction activities could be minimized through implementation of the following:

- Avoid wetland areas to the extent practicable.

- Establish new site drainages potentially capable of developing new wetland areas.

### Solid Waste and Hazardous Materials

Impacts involving hazardous materials could be minimized through implementation of the following:

- Continue proper vehicle maintenance and inspection to reduce the potential for incidental releases of vehicle fluids.

### Transportation and Parking

Short-term transportation impacts during construction activities could be minimized through implementation of the following:

- Schedule construction activities such that traffic increases do not coincide with typical morning and evening periods of increased traffic.
- Route transportation of construction equipment (namely truckloads of excess soils) to minimize impacts on neighboring communities.

# 6.0 LIST OF PREPARERS

| **U.S. Department of Veterans Affairs Staff** |
|---|
| Glenn Elliott<br>Environmental Engineer<br>Office of Construction & Facilities Management |
| **Contractor Staff (Labat Environmental, Inc. Team)** |
| **Labat Environmental, Inc.**<br>Tamar Krantz, CESCO – Air Quality and Regulatory Compliance Specialist<br>Christine Modovsky, REM, CEA – Project Manager / NEPA Specialist<br>Mary Peters – Biologist<br>Douglas Schlagel, P.E. – Environmental Engineer |
| **Cultural Resource Analysts, Inc. (subcontractor to Labat)**<br>Flora Church, RPA – Archaeologist<br>Elizabeth Heavrin – Architectural Historian |

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# 8.0 GLOSSARY

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- NEPA Glossary, U.S. Fish and Wildlife Service, http://www.fws.gov/r9esnepa/Intro/Glossary.PDF

Aesthetic resources: The components of the environment as perceived through the visual sense only. Aesthetic specifically refers to beauty in both form and appearance.

Affected environment: A portion of the NEPA document that succinctly describes the environment of the area(s) to be affected or created by the alternatives under consideration. Includes the environmental and regulatory setting of the proposed action.

Alternative: A reasonable way to fix the identified problem or satisfy the stated need.

Attainment area: An area that the Environmental Protection Agency has designated as being in compliance with one or more of the National Ambient Air Quality Standards for sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone, lead, and particulate matter. An area may be in attainment for some pollutants but not for others.

Conformity analysis: The *Clean Air Act* requires the Environmental Protection Agency to promulgate rules to ensure that federal actions conform to the appropriate state implementation plans (SIP) for air quality. Two sets of rules (one for transportation and one for all other actions) developed by EPA establish the criteria and procedures governing the determination of this conformity. A conformity analysis follows these criteria and procedures to quantitatively assess whether a proposed federal action confirms with the SIP.

Council on Environmental Quality (CEQ): Established by Congress within the Executive Office of the President as part of the *National Environmental Policy Act of 1969*, CEQ coordinates federal environmental efforts and works closely with agencies and other White House offices in the development of environmental policies and initiatives. The Council's Chair, who is appointed by the President with the advice and c consent of the Senate, serves as the principal environmental policy adviser to the President. The CEQ reports annually to the President on the state of the environment, oversees federal agency implementation of the environmental impact assessment process, and acts as a referee when agencies disagree over the adequacy of such assessments.

Criteria pollutant: An air pollutant that is regulated by National Ambient Air Quality Standards. Criteria pollutants include sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone, lead, and two size classes of particulate matter, $PM_{10}$ and $PM_{2.5}$ New pollutants may be added to, or removed from, the list of criteria pollutants as more information becomes available.

Cumulative effect (cumulative impact): The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future

actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

Decibel (dB): A unit for expressing the relative intensity of sounds on a logarithmic scale from zero for the average least perceptible sound to about 130 for the average level at which sound causes pain to humans. For traffic and industrial noise measurements, the A-weighted decibel (dBA), a frequency-weighted noise unit, is widely used. The A-weighted decibel scale corresponds approximately to the frequency response of the human ear and thus correlates well with the loudness perceived by people.

Effects: Effects and impacts, as used in NEPA, are synonymous. Effects include ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions that may have both beneficial and detrimental effects, even if on balance the agency believes that the effect would be beneficial. There are direct effects and indirect effects. Direct effects are caused by the action and occur at the same time and place. Indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

Endangered species: Plants or animals that are in danger of extinction through all or a significant portion of their ranges and that have been listed as endangered by the U.S. Fish and Wildlife Service or the National Marine Fisheries Service following the procedures outlined in the *Endangered Species Act* and its implementing regulations.

Environmental assessment (EA): A concise public document for which a federal agency is responsible that serves to briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement (EIS) or a finding of no significant impact; aid an agency's compliance with NEPA when no environmental impact statement is necessary; or facilitate preparation of an EIS when one is necessary. Includes brief discussions of the need for the proposal, of alternatives, of the environmental impacts of the proposed action and alternatives, and a listing of agencies and persons consulted.

Environmental impact statement (EIS): A detailed written statement required by Section 102(2)(C) of NEPA, analyzing the environmental impacts of a proposed action, adverse effects of the project that cannot be avoided, alternative courses of action, short-term uses of the environment versus the maintenance and enhancement of long-term productivity, and any irreversible and irretrievable commitment of resources.

Environmental justice: The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic groups, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies. Executive Order 12898 directs federal agencies to make achieving environmental justice part of their missions by identifying and addressing

disproportionately high and adverse effects of agency programs, policies, and activities on minority and low-income populations.

Finding of no significant impact (FONSI): A public document issued by a federal agency briefly presenting the reasons why an action for which the agency has prepared an environmental assessment has no potential to have a significant effect on the human environment and, thus, would not require preparation of an environmental impact statement.

Floodplain: The lowland and relatively flat areas adjoining inland and coastal waters including flood-prone areas of offshore islands, including at a minimum, that area subject to a one percent or greater chance of flooding in any given year.

Fugitive emissions: Emissions that do not pass through a stack, vent, chimney, or similar opening where they could be captured by a control device. Any air pollutant emitted to the atmosphere other than from a stack. Sources of fugitive emissions include pumps; valves; flanges; seals; area sources such as ponds, lagoons, landfills, and piles of stored material (such as coal); and road construction areas or other areas where earthwork is occurring.

Hazardous material: Any material that poses a threat to human health and/or the environment. Hazardous materials are typically toxic, corrosive, ignitable, explosive, or chemically reactive.

Historic property: Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.

Impacts: see Effects.

Impervious surface: A hard surface area that either prevents or retards the entry of water into the soil or causes water to run off the surface in greater quantities or at an increased rate of flow. Common impervious surfaces include, but are not limited to, rooftops, walkways, patios, driveways, parking lots, storage areas, concrete or asphalt paving, and gravel roads.

National Ambient Air Quality Standards (NAAQS): Standards defining the highest allowable levels of certain pollutants in the ambient air (i.e., the outdoor air to which the public has access). Primary standards are established to protect public health; secondary standards are established to protect public welfare (for example, visibility, crops, animals, buildings).

National Pollutant Discharge Elimination System (NPDES): A provision of the *Clean Water Act* that prohibits discharge of pollutants into waters of the United States unless a special permit is issued by the Environmental Protection Agency, a state, or, where delegated, a tribal government on an Indian reservation.

National Register of Historic Places: The nation's inventory of known historic properties that have been formally listed by the National Park Service (NPS). The National Register of Historic Places is administered by the NPS on the behalf of the Secretary of the Interior. National Register listings include districts, landscapes, sites, buildings, structures, and objects that meet the set of criteria found in 36 CFR 60.4.

No action alternative: The alternative where current conditions and trends are projected into the future without another proposed action.

Particulate matter (PM), $PM_{10}$, $PM_{2.5}$: Any finely divided solid or liquid material, other than uncombined (that is, pure) water. A subscript denotes the upper limit of the diameter of particles included. Thus, $PM_{10}$ includes only those particles equal to or less than 10 micrometers (0.0004 inch) in diameter; $PM_{2.5}$ includes only those particles equal to or less than 2.5 micrometers (0.0001 inch) in diameter.

Proposed action: In a NEPA document, this is the primary action being considered. Its impacts are analyzed together with the impacts from alternative ways to achieve the same objective and the required no action alternative, which means continuing with the status quo.

Runoff: The portion of rainfall, melted snow, or irrigation water that flows across ground surface and is eventually returned to streams. Runoff can pick up pollutants from the air or the land and carry them to streams, lakes, and oceans.

Scope: Consists of the range of actions, alternatives, and impacts to be considered in an environmental analysis. The scope of an individual statement may depend on its relationships to other statements (also see tiering).

Scoping: An early and open process for determining the extent and variety of issues to be addressed and for identifying the significant issues related to a proposed action (40 CFR §1501.7). The scoping process helps not only to identify significant environmental issues deserving of study, but also to deemphasize insignificant issues, narrowing the scope of the NEPA process accordingly, and for early identification of what are and what are not the real issues (40CFR §1500.5(d)). The scoping process identifies relevant issues related to a proposed action through the involvement of all potentially interested or affected parties (affected federal, state, and local agencies; recognized Indian tribes; interest groups, and other interested persons) in the environmental analysis and documentation.

Significantly: As used in NEPA, requires considerations of both context and intensity. Context—significance of an action must be analyzed in its current and proposed short- and long-term effects on the whole of a given resource (for example, affected region). Intensity—refers to the severity of the effect

Solid waste: Non-liquid, non-soluble materials ranging from municipal garbage to industrial wastes that contain complex and sometimes hazardous substances. Solid wastes also include sewage sludge, agricultural refuse, demolition wastes, and mining residues. Technically, solid waste also refers to liquids and gases in containers.

Wetlands: Those areas that are inundated by surface water or groundwater with a frequency sufficient to support, and under normal circumstances do, or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas. Jurisdictional wetlands are those wetlands protected by the *Clean Water Act*. They must have a minimum of one positive wetland indicator from each parameter (vegetation, soil, and hydrology). The U.S. Army Corps of Engineers requires a permit to fill or dredge jurisdictional wetlands.

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# APPENDIX A: AGENCY AND TRIBAL CORRESPONDENCE

- Letter to U.S. Fish and Wildlife Service: Project review request
- Response to NCA project review request from U.S. Fish and Wildlife Service
- Letter to Ohio State Historic Preservation Office: request for concurrence with no adverse effect
- Response to NCA from Ohio State Historic Preservation Office: Concurrence with no historic properties affected
- Letters to tribes requesting advice and comment: Delaware Nation, Forest County Potawatomi Community, Hannahville Indian Community, Ottawa Tribe of Oklahoma, Wyandotte Nation
- Correspondence from USACE: Approved jurisdictional determination
- Letter to NRCS: Farmland Conversion Impact Rating
- Letter from Ohio Department of Natural Resources, Division of Wildlife: Review of Natural Heritage Database for rare species or unique features in or near project area.
- Letter from Ohio EPA: State coordination regarding impacts to isolated wetlands.

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**DEPARTMENT OF VETERANS AFFAIRS**
**Office of Construction & Facilities Management**
**Washington DC 20420**

February 12, 2015

Dr. Mary Knapp
U.S. Fish and Wildlife Service
4625 Morse Road, Suite 104
Columbus, OH 43230

Re: Ohio Western Reserve National Cemetery, Proposed Cemetery Expansion Project

Dear Dr. Knapp:

The U.S. Department of Veteran Affairs, National Cemetery Administration (NCA), is requesting concurrence from the U.S. Fish and Wildlife Service (USFWS) that proposed expansion and improvements to the Ohio Western Reserve National Cemetery in Medina County, Ohio, is not likely to adversely affect federally protected species. According to the USFWS Species Search website, the following species may be present in Medina County: the endangered Indiana bat (*Myotis sodalis*), the proposed endangered northern long-eared bat (*Myotis septentrionalis*), and the protected bald eagle (*Haliaeetus leucocephalus*).

The Ohio Western Reserve National Cemetery is located at 10175 Rawiga Road, Rittman, Ohio 44270 (41.0036° N, 81.8111° W). This proposed project would cover approximately 30 acres within the boundary of the National Cemetery and provide for 10 years of burial operations including casket, columbarium, and in-ground cremation sites; and provide an Honor Guard Building, supporting infrastructure, parking, irrigation, landscaping, visitor amenities, signage, and operational facility improvements. The proposed project includes site development by grading; placing burial crypts; landscaping with turf, trees, and other vegetation; and establishing site drainage. A topographic map and an aerial image identifying the proposed project area are provided (Attachments 1 and 2).

Habitat in the proposed project area currently consists of native grasses and low shrubs (Attachment 3). Very few trees are located in the proposed project area. Six small wetland areas totaling 0.55 acres are present within the proposed project area; these wetlands have been preliminarily identified as non-jurisdictional wetlands due to their small size and lack of adjacency or connectivity to navigable waters. Tommy Run is a small stream located east of the proposed project area. Habitat along Tommy Run consists of a narrow band of undeveloped riparian woodlands. The proposed project includes stabilizing a severely eroded steep bank at a bend in Tommy Run (Attachment 4) that could affect a few trees. Any near-term localized impact to this wooded riparian area would be minimal, and would be offset by the long-term benefit to the habitat. Neighboring land uses are largely agricultural.

None of the three federally protected species in Medina County has been found previously on the cemetery property. None were observed during a site visit in November 2014. Habitat for these species was also evaluated:

- The Indiana bat and northern long-eared bat both winter in caves and mines, none of which are present on the site. However, in the late spring and summer, these bats migrate to wooded areas where Indiana bats in particular roost under loose tree bark on living or dead trees. Most of the area proposed for development is open, with a few widely scattered deciduous trees. However, the edge of a relatively undisturbed woodland to the east of the NCA property extends from 20 to 200 feet into the northeast corner and part of the southeast border of the proposed expansion area, and would be pushed back along some of its length where needed to accommodate site development. A few trees could be disturbed near Tommy Run to stabilize an area of eroded stream bank, although mature tree removal would be avoided here if possible. No summering Indiana bats or northern long-eared bats have been reported onsite to date. Due to limited tree disturbance and no site records of summer maternity habitat for protected bat species, NCA concludes that the proposed project is not likely to adversely affect either the Indiana bat or northern long-eared bat or their habitat.

- The bald eagle is found near estuaries, large lakes, reservoirs, rivers, and some seacoasts with a good food base, perching areas, and nesting sites. In winter, the birds congregate near open water in tall trees for spotting prey and night roosts for sheltering. The project site offers no habitat with these characteristics, and thus would be expected to see only transitory presence of bald eagles, if any at all. Therefore, NCA concludes that the proposed project is not likely to adversely affect the bald eagle or its habitat.

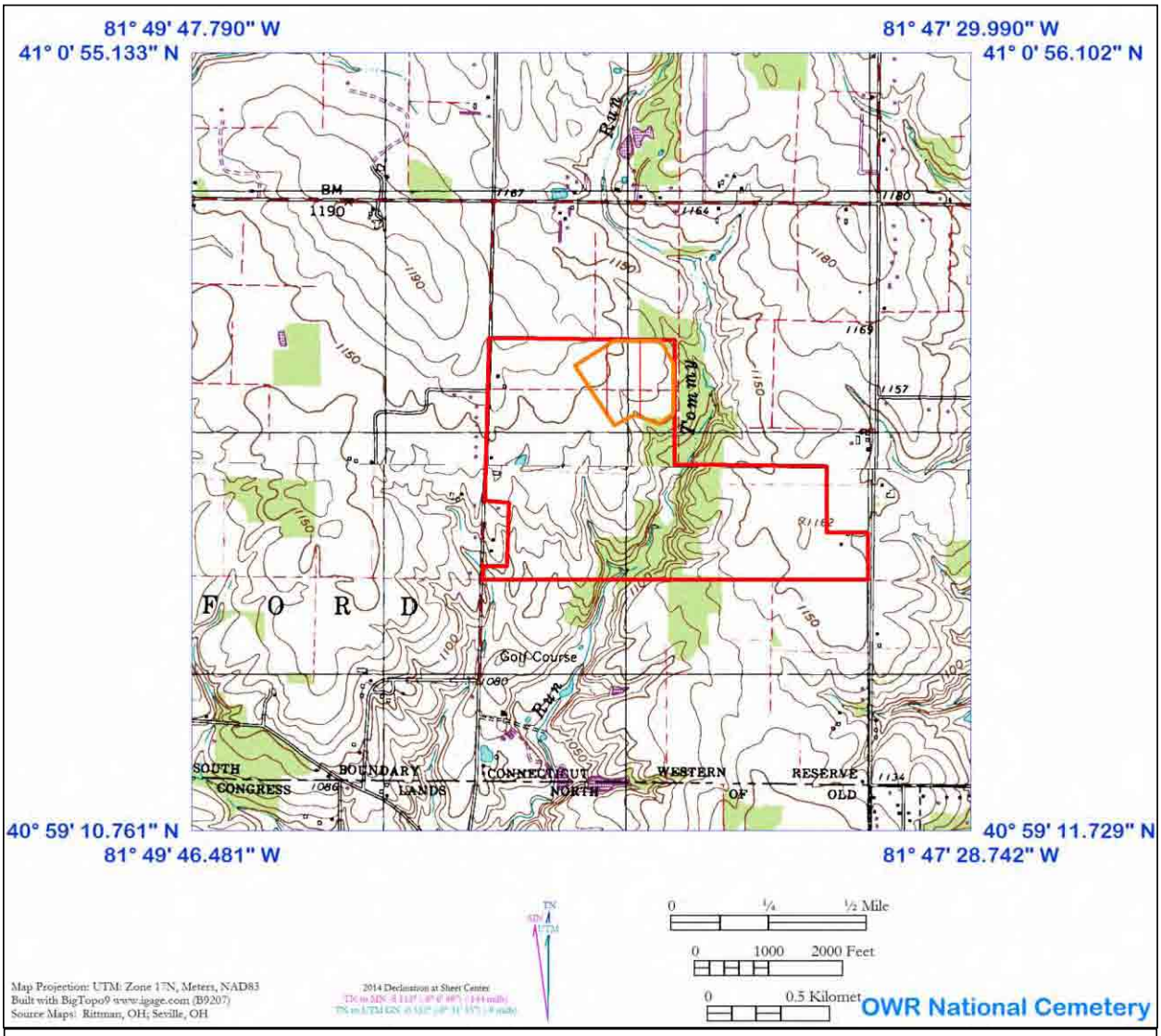
Cemetery operations will continue the responsible use of pesticides and road deicing chemicals, keeping usage to the lowest quantities possible and thereby reducing potential indirect impacts to Tommy Run and the associated riparian habitat.

For these reasons, NCA concludes that the proposed cemetery expansion project is not likely to adversely affect federally protected species. We request your concurrence with our determinations. If you have any comments or require any additional information in order to concur with this finding, please contact me at (202) 632-5879 or Glenn.Elliott@va.gov.

Sincerely,

Glenn Elliott
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management, Environmental Engineer

## Attachment 1. Proposed Project Area, Topographic Map



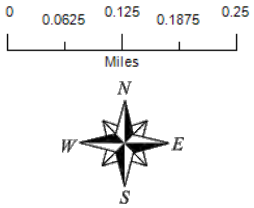

**Legend**

- Ohio Western Reserve National Cemetery
- Proposed Project Area

## Attachment 2. Proposed Project Area, Aerial Image

**Legend**

- Ohio Western Reserve National Cemetery
- Proposed Project Area




*Coordinate System: WGS84 Web Mercator (Auxiliary Sphere)*
*Basemap Source: Bing Aerial, 2014*

**Attachment 3. Proposed Project Area, Representative Land Cover**

**Attachment 4. Eroded Stream Bank**

**From:** susan_zimmermann@fws.gov [mailto:susan_zimmermann@fws.gov] **On Behalf Of** Ohio, FW3
**Sent:** Wednesday, February 25, 2015 11:51 AM
**To:** Elliott, Glenn (CFM)
**Cc:** nathan.reardon@dnr.state.oh.us; Jenny Norris
**Subject:** [EXTERNAL] Ohio Western Reserve National Cemetery, Proposed Extension Project, Medina Co. OH

UNITED STATES DEPARTMENT OF THE INTERIOR
U.S. Fish and Wildlife Service
Ecological Services Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / Fax (614) 416-8994

TAILS# 03E15000-2015-TA-0760

Dear Mr. Elliott,

We have received your recent correspondence requesting information about the subject proposal. There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under section 7 of the Endangered Species Act of 1973, as amended (ESA).

The Service recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

*LISTED SPECIES COMMENTS:* All projects in the State of Ohio lie within the range of the **Indiana bat** (*Myotis sodalis*), a federally listed endangered species. Since first listed as endangered in 1967, their population has declined by nearly 60%. Several factors have contributed to the decline of the Indiana bat, including the loss and degradation of suitable hibernacula, human disturbance during hibernation, pesticides, and the loss and degradation of forested habitat, particularly stands of large, mature trees. Fragmentation of forest habitat may also contribute to declines. During winter, Indiana bats hibernate in caves and abandoned mines. Summer habitat requirements for the species are not well defined but the following are considered important:

(1) dead or live trees and snags with peeling or exfoliating bark, split tree trunk and/or branches, or cavities, which may be used as maternity roost areas;

(2) live trees (such as shagbark hickory and oaks) which have exfoliating bark;

(3) stream corridors, riparian areas, and upland woodlots which provide forage sites.

Should the proposed site contain trees or associated habitats exhibiting any of the characteristics listed above and/or the site contains any caves or abandoned mines, we recommend that the habitat and surrounding trees be saved wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if surveys are warranted. Any survey should be designed and conducted in coordination with the Endangered Species Coordinator for this office. If no caves or abandoned mines are present and trees cannot be avoided, <u>any</u> unavoidable tree removal should only occur between October 1 and March 31. If implementation of the seasonal tree cutting restriction is not possible, summer surveys should be conducted to document the presence or likely absence of the Indiana bat within the project area during the summer. The survey must be conducted by an approved surveyor and be designed and conducted in coordination with the Endangered Species Coordinator for this office.

If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), no tree clearing on any portion of the parcel should occur until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend that the federal action agency submit a determination of effects to this office, relative to the Indiana bat, for our review and concurrence.

*PROPOSED SPECIES COMMENTS:* The proposed project lies within the range of the **northern long-eared bat** (*Myotis septentrionalis*), a species that is currently proposed for listing as federally endangered under the Endangered Species Act (ESA) (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*). The final listing decision for the northern long-eared bat will occur no later than April 2, 2015. No critical habitat has been proposed at this time. Recently white-nose syndrome (WNS), a novel fungal pathogen, has caused serious declines in the northern long-eared bat population in the northeastern U.S. WNS has also been documented in Ohio, but the full extent of the impacts from WNS in Ohio is not yet known.

During winter, northern long-eared bats hibernate in caves and abandoned mines. Summer habitat requirements for the species are not well defined but the following are considered important:

(1) Roosting habitat in dead or live trees and snags with cavities, peeling or exfoliating bark, split tree trunk and/or branches, which may be used as maternity roost areas;

(2) Foraging habitat in upland and lowland woodlots and tree lined corridors;

(3) Occasionally they may roost in structures like barns and sheds.

Pursuant to section 7(a)(4) of the ESA, federal action agencies are required to confer with the Service if their proposed action is likely to jeopardize the continued existence of the northern long-eared bat (50 CFR 402.10(a)). Federal action agencies may also voluntarily confer with the Service if the proposed action may affect a proposed species. Nevertheless, species proposed for listing are not afforded protection under the ESA; however as soon as a listing becomes effective, the prohibition against jeopardizing its continued existence and “take” applies

regardless of an action's stage of completion. If the federal agency retains any discretionary involvement or control over on-the-ground actions that may affect the species after listing, section 7 applies. Therefore, should the proposed site contain trees or associated habitats exhibiting any of the characteristics listed above and/or the site contains any caves or abandoned mines, we are recommending that the habitat and surrounding trees be saved wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if surveys are warranted.

If no caves or abandoned mines are present and trees cannot be avoided, any unavoidable tree removal should only occur between October 1 and March 31 to avoid impacts to northern long-eared bats. Incorporating these conservation measures into your project at this time may avoid significant future project delays should the listing become official.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be initiated to assess any potential impacts.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the Endangered Species Act of 1973 (ESA), as amended, and are consistent with the intent of the National Environmental Policy Act of 1969 and the U. S. Fish and Wildlife Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. We recommend that the project be coordinated with the Ohio Department of Natural Resources due to the potential for the project to affect state listed species. Contact John Kessler, Environmental Services Administrator, at (614) 265-6621 or at john.kessler@dnr.state.oh.us.

Sincerely,

Dan Everson

Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW

Jennifer Norris, ODNR-DOW

January 26, 2015

David Snyder
Archaeology Reviews Manager
Ohio History Connection
800 E. 17th Ave.
Columbus, Ohio 43211-2474

Dear Dr. Snyder,

Thank you for taking the time to meet with me at Ohio Western Reserve National Cemetery in Medina County to discuss the National Cemetery Administration's (NCA's) proposed project at this property. NCA is providing this letter pursuant to 36 CFR Part 800.3 to formally initiate consultation with the Ohio State Historic Preservation Office regarding the proposed project. As we discussed during our meeting, this proposed project will cover approximately 30 acres within the boundary of the Ohio Western Reserve National Cemetery and provide for 10 years of burial operations including casket, columbarium, and in-ground cremation sites; and provide an Honor Guard Building, supporting infrastructure, parking, irrigation, landscaping, visitor amenities, signage, and operational facility improvements. NCA is considering three alternatives in the environmental review process:

- ***Proposed Action*** to expand and improve the Ohio Western Reserve National Cemetery in the northeastern portion of the existing cemetery property, to provide 10 years of burial expansion.
- ***Alternative Action*** to expand and to not improve the Ohio Western Reserve National Cemetery in the western portion of the existing cemetery property, to provide 10 years of burial expansion.
- The ***No Action*** alternative to not expand and improve the Ohio Western Reserve National Cemetery, but to continue burial operations until the current cemetery capacity is reached and conducting site maintenance activities thereafter.

The proposed expansion and improvements include the following:

- Columbarium – A columbarium would be constructed (25,500 capacity). Each of its three sections would be 4 to 5 niches high (approximately 8 to 10 feet high). The columbarium would be located in the extreme northeastern portion of the project area.
- Crypt – Eight crypt sections would be constructed (13,750 capacity). The crypt sections would be located immediately northeast of Flag Boulevard.
- Garden Niche – Five garden niche sections would be constructed (3,996 capacity). The garden niche sections would be located between the columbarium and crypt sections in the northeastern and eastern portions of the project area.
- Committal Shelter – One committal shelter would be constructed in the southeastern portion of the project area. The committal shelter would be constructed similar to the two existing shelters at the cemetery. The committal shelter would be served by electric utilities to provide lighting and small electric heating capabilities inside the structure. Telephone communications would also be installed.
- Honor Guard Building – One Honor Guard Building would be constructed in the vicinity of existing Committal Shelter #2 (southern portion of the cemetery). The Honor Guard Building would be served by electric utilities to provide lighting and small electric heating capabilities inside the structure. Telephone communications would also be installed. The Honor Guard

Building would be connected to the cemetery's potable water supply and served by a wastewater septic system.

- Roadways and Parking – New roadways and bump-out parking areas would be constructed in the expansion project area. Existing roadways requiring remediation would be improved. A temporary construction access road would be constructed near the northern property boundary. Signage would be placed throughout the expansion project area as appropriate.
- Landscaping – The expansion area would be landscaped in keeping with the overall cemetery appearance, for visual aesthetics and to provide a sound barrier. Landscape irrigation would be provided from a new groundwater supply well that would be part of the site improvements.

The alternative action consists of largely the same elements, although arranged differently in the western part of the cemetery. Figures 1–3 depict the cemetery and the proposed and alternative site plans.

As you know, the entire national cemetery property was subject to previous investigation, coordinated with your office, prior to its initial development in 1994–1995. It is located in southeastern Medina County, approximately 1.5 miles northwest of Rittman, Ohio. The project area itself is former farmland, cut by Tommy Creek, which encompassed the remains of three farmsteads at the time of the original cultural resources survey in 1993. The proposed project is located in the northwest portion of the original land selected for the cemetery. During original cemetery development, this portion of the property was graded and roadways were added to serve future development needs (Figures 4 and 5). There are no existing structures at this location. Historic architectural resources in the vicinity of the cemetery include several nineteenth-century farmsteads with associated outbuildings.

For the purposes of this proposed project, NCA has defined the area of potential effect (APE) for archaeological resources to include the two approximately 30-acre project areas for the preferred and alternative actions, and the APE for historic architectural resources to include the project areas and adjacent properties within the viewshed of the proposed project. A summary of previous investigations and resources within the APE is provided below, and the locations of previously recorded sites are indicated on Figure 6:

## Archaeological Resources:

The land acquired by NCA for development of the Ohio Western Reserve National Cemetery, consisting of 97 hectares (240 acres), was surveyed in its entirety for archaeological resources and was investigated by a pedestrian survey supplemented with screened shovel testing (Otter 1993). The survey was conducted to identify and evaluate any archaeological resources in the project area that might be adversely affected by the development of the cemetery. Surface survey, using transects spaced at 10-meter intervals, identified 14 prehistoric sites (33ME290 through 33ME303). Shovel tests were excavated every 30 meters in transects spaced 30 meters apart. A total of 177 shovel tests were excavated, resulting in documentation of two historic sites (33ME304 and 33ME305). A third historic site (33ME306) was documented on the basis of standing structures and the potential for archaeological deposits.