

# **FINDING OF NO SIGNIFICANT IMPACT: U.S. DEPARTMENT OF VETERANS AFFAIRS EXPANSION AND IMPROVEMENTS, OHIO WESTERN RESERVE NATIONAL CEMETERY, RITTMAN, OHIO**

## **Introduction**

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) prepared an environmental assessment (EA) of 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 EA was prepared 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's "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*. The EA also tiers to and incorporates by reference the findings of the *Final Environmental Impact Statement [EIS] for a National Cemetery to Serve the Cleveland Area*, dated October 1992, and subsequent record of decision for constructing and operating a new national cemetery in north-central Ohio. The final EIS and record of decision are incorporated into this finding of no significant impact by reference.

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.

## **Background**

NCA is responsible for providing cemetery services for veterans and other eligible persons pursuant to the provisions of the *National Cemeteries Act of 1973* and other statutory authority and regulations. Under this mandate, NCA is responsible for the operation and maintenance of existing national cemeteries and the construction of new national cemeteries.

In the October 1992 Final EIS and record of decision, VA identified the site now known as the Ohio Western Reserve National Cemetery as the environmentally preferred alternative and 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. Approximately 60 percent of the burials are for Veterans; the remaining 40 percent are for Veterans' relatives. As of November 19, 2014, 26,352 interments have been completed. The cemetery's current capacity would be reached as soon as late 2015.

## **Proposed Action**

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. The majority of new development would occur in the northeastern portion of the existing cemetery property. The Proposed Action would provide for 10 more 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.

## **Alternatives**

In addition to the Proposed Action described above, NCA evaluated an Alternative Action and the No Action alternative. 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. The majority of new development would occur in the western portion of the existing cemetery property. The Alternative Action would also provide for 10 more 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 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.

## **Environmental Analysis**

As documented in the EA, NCA concludes no significant adverse impacts, either individually or cumulatively, would result from implementing the Proposed Action. The Proposed Action would have no or negligible adverse effects on cultural resources, geology, land use, floodplains, coastal zone management, environmental justice, and utilities. During construction and operation of the Proposed Action, less-than-significant minor adverse effects would occur to aesthetics, air quality, soils, hydrology and water quality, wildlife and habitat, noise, wetlands, solid waste and hazardous materials, and

transportation and parking. VA will implement the best management practices, impact minimization techniques, monitoring opportunities, and regulatory compliance measures to maintain these effects at less-than-significant levels as described in the EA and summarized in the attached table (Appendix A). The Proposed Action would have less-than-significant beneficial long term effects on socioeconomics (possible short-term localized beneficial impact to employment during construction) and community services (continuing beneficial impact by providing burial services for Veterans and their families). No significant cumulative adverse effects to any resources are anticipated. No potential for generating substantial controversy was identified.

## **Agency and Public Comment**

The public involvement process for this EA began with a scoping meeting at the cemetery on December 16, 2014. The notice of availability 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, and the EA was made available on the VA website and deposited in the local public libraries. Letters requesting review were sent to federal, state, and local agencies and tribal representatives. Three comment letters were received, all from government agencies. The U.S. EPA Region 5 recommended that the Final EA include a discussion on current embalming practices. The Ohio State Historic Preservation Office documented its concurrence that no historic properties would be affected by the Proposed Action. The City of Rittman commented on the proposed installation and operation of groundwater wells for landscape irrigation.

## **Minimization Measures**

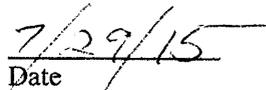
The analysis of the Proposed Action did not identify any mitigation measures required to reduce potential impacts to less than significant. In addition, VA will implement the routine minimization measures and best management practices identified in the EA and summarized in the attached table (Appendix A).

## **Finding of No Significant Impact**

As a result of the analysis of impacts in the EA, summarized and incorporated by reference herein, it is the conclusion of VA that, with the implementation of appropriate best management practices and minimization techniques, the Proposed Action would not generate significant public controversy nor have a significant adverse impact on the quality of the natural or human environment within the meaning of Section 102(C) of NEPA. Therefore, preparation of an environmental impact statement is not required.

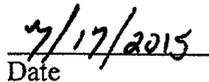


Diana J. Ohman  
Director, NCA Continental District

  
Date



Glenn Elliott  
Environmental Engineer  
Office of Construction & Facilities Management

  
Date

## Attachment A. Best Management Practices and Minimization Techniques Incorporated into the Proposed Action

Technical Resource Area	Best Management Practice/Minimization Measure
Aesthetics	Conduct construction activities with a sensitivity toward maintaining the dignity and solemnity of the national cemetery environment during interment services.
Air Quality	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 the State Historic Preservation Officer (SHPO), NCA will notify the SHPO if new or additional effects or historic properties are identified.
Geology and Soils	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 National Pollutant Discharge Elimination System general permit.
	Implement spill and leak prevention and response procedures.
Hydrology and Water Quality	Implementation the best management practices listed above for Geology and Soils.
	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.

<b>Technical Resource Area</b>	<b>Best Management Practice/Minimization Measure</b>
Wildlife and Habitat	<p>Project or construction personnel will 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 will be developed in consultation with VA Office of Construction &amp; 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 in Rashin, E.B., and R.G. Frye. 2013. <i>Implementation of an effective migratory bird nesting protection program for a 49-mile, new location toll road construction project in central Texas: Next protection measures and results over three nesting seasons</i>. Proceedings of the 2013 International Conference on Ecology and Transportation. <a href="http://www.icoet.net/ICOET_2013/documents/papers/ICOET2013_Paper211C_Rashin_Frye.pdf">www.icoet.net/ICOET_2013/documents/papers/ICOET2013_Paper211C_Rashin_Frye.pdf</a>).</p> <p>Any unavoidable tree removal will only occur between October 1 and March 31.</p> <p>Cemetery operations will continue the responsible use of pesticides and road deicing chemicals, keeping usage to the lowest quantities possible.</p>
Noise	<p>Schedule construction activities for daylight hours, attempting to minimize impacts to ongoing cemetery operations.</p> <p>Maintain mufflers and sound shielding on construction equipment and routine maintenance equipment.</p> <p>Minimize equipment idling, and shut down construction equipment when not in use.</p>
Wetlands	<p>Avoid wetland areas to the extent practicable.</p> <p>Establish new site drainages potentially capable of developing new wetland areas.</p>
Solid Waste and Hazardous Materials	<p>Continue proper vehicle maintenance and inspection to reduce the potential for incidental releases of vehicle fluids.</p>
Transportation and Parking	<p>Schedule construction activities such that traffic increases do not coincide with typical morning and evening periods of increased traffic.</p> <p>Route transportation of construction equipment (namely truckloads of excess soils) to minimize impacts on neighboring communities.</p>

*This page intentionally left blank.*