
***Final Environmental Assessment
for the
Salisbury National Cemetery
Gravesite Expansion,
Salisbury, North Carolina***

Prepared for:
**Department of Veterans Affairs
National Cemetery Administration
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EXECUTIVE SUMMARY

The Department of Veterans Affairs (VA) is designing an expansion of the Salisbury National Cemetery (SNC) on existing cemetery land at the SNC western parcel. This Environmental Assessment (EA) evaluates the potential impacts of the Proposed Action on the environment, including natural and historical resources, social and economic aspects and environmental justice. The information presented in this EA along with the input from the public, will assist VA in its decision-making process prior to committing resources to the Proposed Action.

This document has been prepared in compliance with the National Environmental Policy Act of 1969 (NEPA) (42 United States Code 4321 *et seq.*), the President's Council on Environmental Quality Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations (CFR) 1500-1508), and Environmental Effects of the Department of Veterans Affairs Actions (38 CFR Part 26).

The purpose of the Proposed Action is to enable VA to provide eligible veterans and their families in North Carolina with National Cemetery capacity. Burial at a National Cemetery is an earned benefit provided to Veterans through the VA.

The Proposed Action is needed to meet the VA's National Cemetery Administration's goal of increasing burial options in areas with an unserved or underserved Veteran population, as specified by Congress. The increased capacity of the Salisbury National Cemetery would help the VA comply with the Servicemembers Civil Relief Act (SCRA). The Proposed Action will address the need for interment capacity within the next decade. Currently, the inventory of available developed space for crypts and cremains, both in-ground and columbaria, is anticipated to be exhausted within two to three years.

In this EA the following resource areas are evaluated: aesthetics; air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat; noise; land use; floodplains and wetlands; socioeconomics; community services; solid and hazardous waste; transportation and parking; utilities; environmental justice; and other environmental concerns. Cumulative effects and potential for generating substantial controversy are also discussed. A summary of the *Preferred Action Alternative's* environmental impacts for each resource area is presented in Table ES-1 below.

Table ES-1. Summary of Impacts of the Preferred Alternative: Development of 14 Acres

Resource	Impacts⁽¹⁾	Comments
Aesthetics	Minor, short-term	
Air Quality	Minor, short-term	
Cultural Resources	Negligible or no impacts.	
Geology and Soils	Minor, short-term Minor, long-term	Topography would be altered by excavation and grading, and soils would be disrupted.
Hydrology and Water Quality	Minor, short-term Minor, long-term	Reduction in surface water runoff from landscaped area, but landscaping will require irrigation.
Wildlife and Habitat	Minor, short-term Minor, long-term	Tree removal should be during the non-nesting season to mitigate impacts to migratory birds.
Noise	Minor, short-term Minor, long-term	Construction, operations, maintenance and gun salute noise may be mitigated by schedules and appropriate maintenance of machinery.
Land Use	Negligible or no impacts.	
Floodplain and Wetlands	Minor, short-term Minor, long-term	Impacts to floodplain and wetlands will be minimized and permitted.
Socioeconomic	Minor ⁽²⁾ , short-term Minor ⁽²⁾ , long-term	
Community Services	Minor, short-term Minor, long-term	
Solid Waste and Hazardous Materials	Minor, short-term Minor, long-term	
Transportation and Parking	Minor, short-term	
Utilities	Minor, short-term Minor, long-term	
Environmental Justice	Negligible or no impacts.	
Other Environmental Concerns	Minor, short-term Minor, long-term	

(1) Minor refers to “Areas of minor, less than significant impacts, primarily adverse”.

(2) Minor refers to “Areas of minor, less than significant impacts, primarily beneficial”.

Based on the analysis presented in this EA and preliminary coordination with public agencies and public participation, it is expected that the Proposed Action would not have a significant impact

on the environment. Any potential impact would be avoided or mitigated through the implementation of BMPs and compliance with statutory and regulatory process already in place in the State of North Carolina. Therefore, a Finding of No Significant Impact (FONSI) is appropriate and an Environmental Impact Statement (EIS) is not required.

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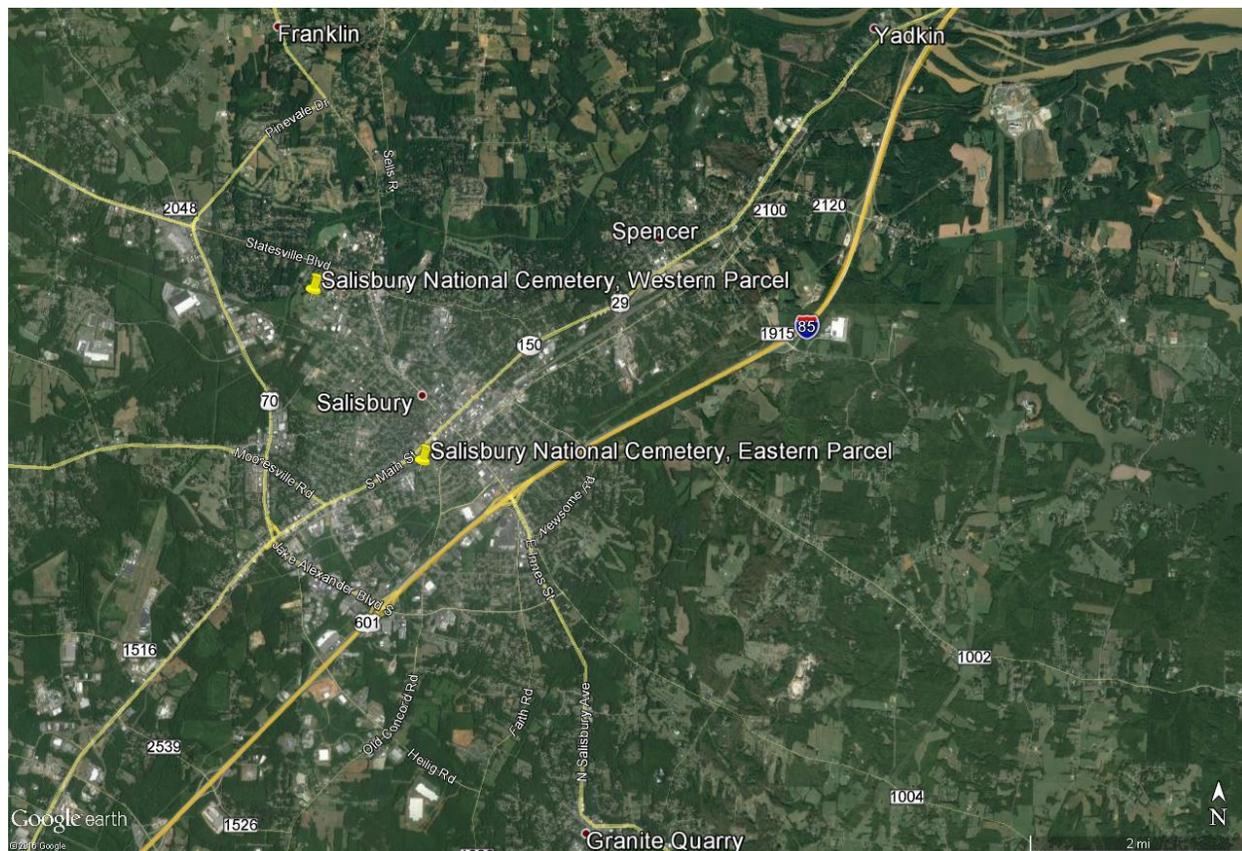
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1.0 INTRODUCTION

This Environmental Assessment (EA) has been prepared in response to the Department of Veterans Affairs' (VA's) Proposed Action: gravesite expansion on 14 acres at the Salisbury National Cemetery (SNC) western parcel. The EA will identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic effects associated with the Proposed Action and has been prepared in compliance with the directives of the National Environmental Policy Act (NEPA) of 1969 (42 United States Code (USC) 4321 et seq.); the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations (CFR) 1500-1508); and 38 CFR Part 26 (Environmental Effects of the Department of Veterans Affairs (VA) Actions). It follows the VA "NEPA Interim Guidance for Projects" (2010a).

The western parcel was donated to SNC from the William (Bill) Hefner VA Medical Center. No record of previous NEPA compliance documentation has been discovered for the SNCA. Therefore, this is a stand-alone analysis, not a tiered EA building on previous environmental analyses.

Figure 1. General location of the proposed action



1.1 Project Background

The Salisbury National Cemetery includes two separate locations. The historic section of Salisbury National Cemetery is located at 202 Government Road in Salisbury. This location is 15 acres with space to accommodate subsequent interments (spouses), but no new sites are available. The Salisbury National Cemetery western parcel, including the new administrative office and maintenance shop is located at 501 Statesville Boulevard in Salisbury, approximately 2.6 miles from the historic section. The western parcel is approximately 50 acres. The locations of the original and western portions are shown on a regional aerial photo and map on Figure 1.

The cemetery at the historic location of the original Salisbury National Cemetery was established by Confederate authorities to serve as the burial ground for captured Union soldiers incarcerated at the prison in Salisbury (VA, 2016). The cemetery was designated Salisbury National Cemetery after the war and dedicated in 1874.

Additions were made to the historic cemetery up until 1995. At that time the cemetery was anticipated to be at full capacity – except for burials of spouses – in the very near future (Wineka, 2012). On Memorial Day 1999, the VA announced the donation of about 40 acres at the W.G. (Bill) Hefner VA Medical Center in Salisbury to the Salisbury National Cemetery (Ashe, 1999). The Hefner VA Medical Center has been established at this location since 1953. The two parts of the cemetery – the historical and the western parcel – operate as a single National Cemetery.

Figure 2 shows the approximate boundary of the Salisbury National Cemetery western parcel on a 2014 aerial photo. The developed portion of the western parcel currently covers approximately 18.5 acres, and includes burial sites, columbarium, memorials, a committal shelter, administration and maintenance facilities. The developed area is irrigated and landscaped. As of May 2016, the developed capacity of the Salisbury National Cemetery is anticipated to reach full capacity (except for subsequent burial of spouses and family members) by sometime in 2017 or 2018.

The Proposed Action is for additional development of the space available at the western parcel for 4,500 additional pre-placed crypts; 1,800 columbarium niches; 1,600 in-ground cremains; and 300 traditional casket sites. The Proposed Action will also include site work, landscaping, roadwork, signage, irrigation, and site furnishings to support the newly developed area. Figure 3 shows the area of proposed development and the columbarium in which additional niches are proposed to be built.

Figure 2. Approximate areas of previous development and proposed development

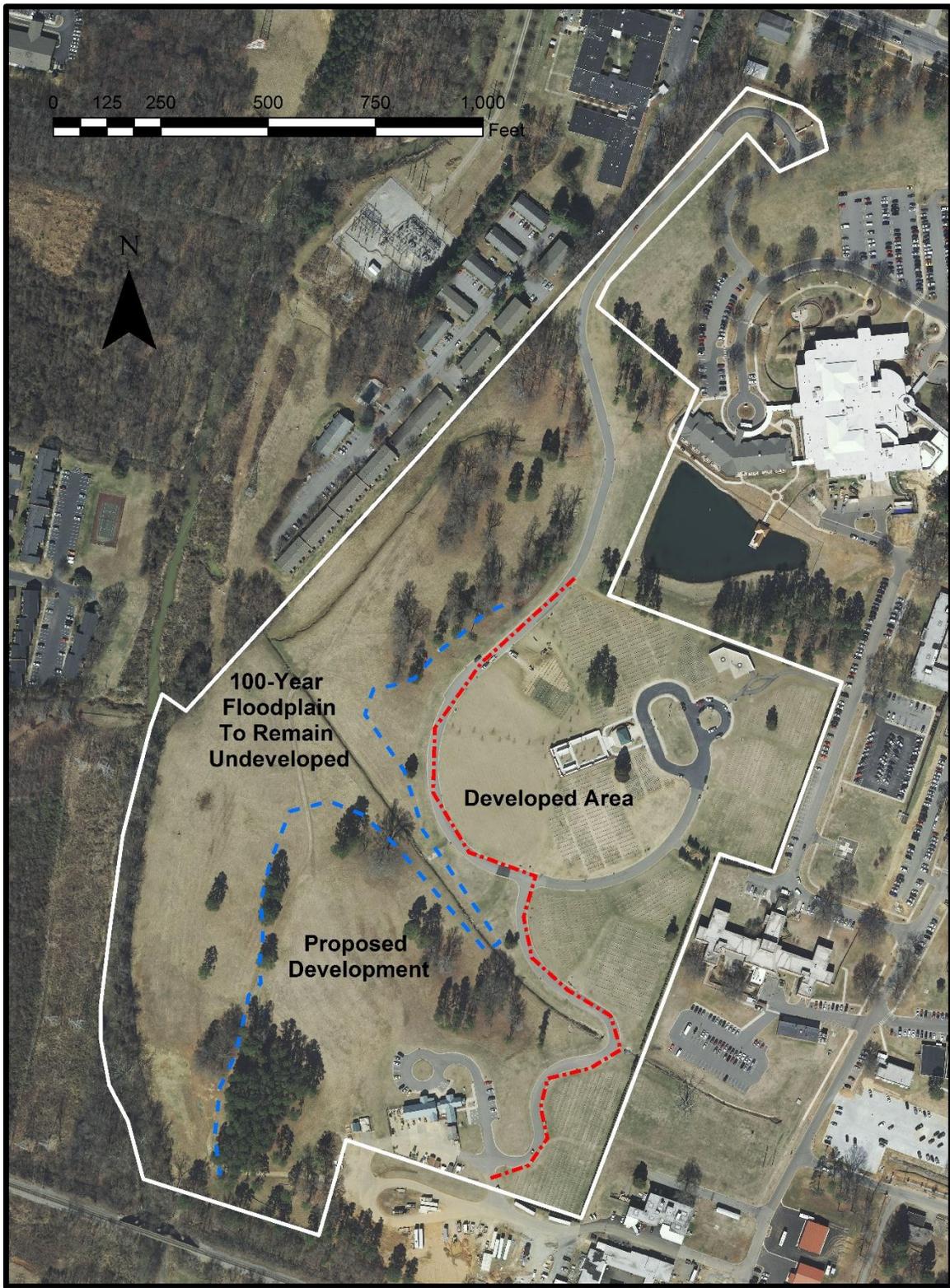
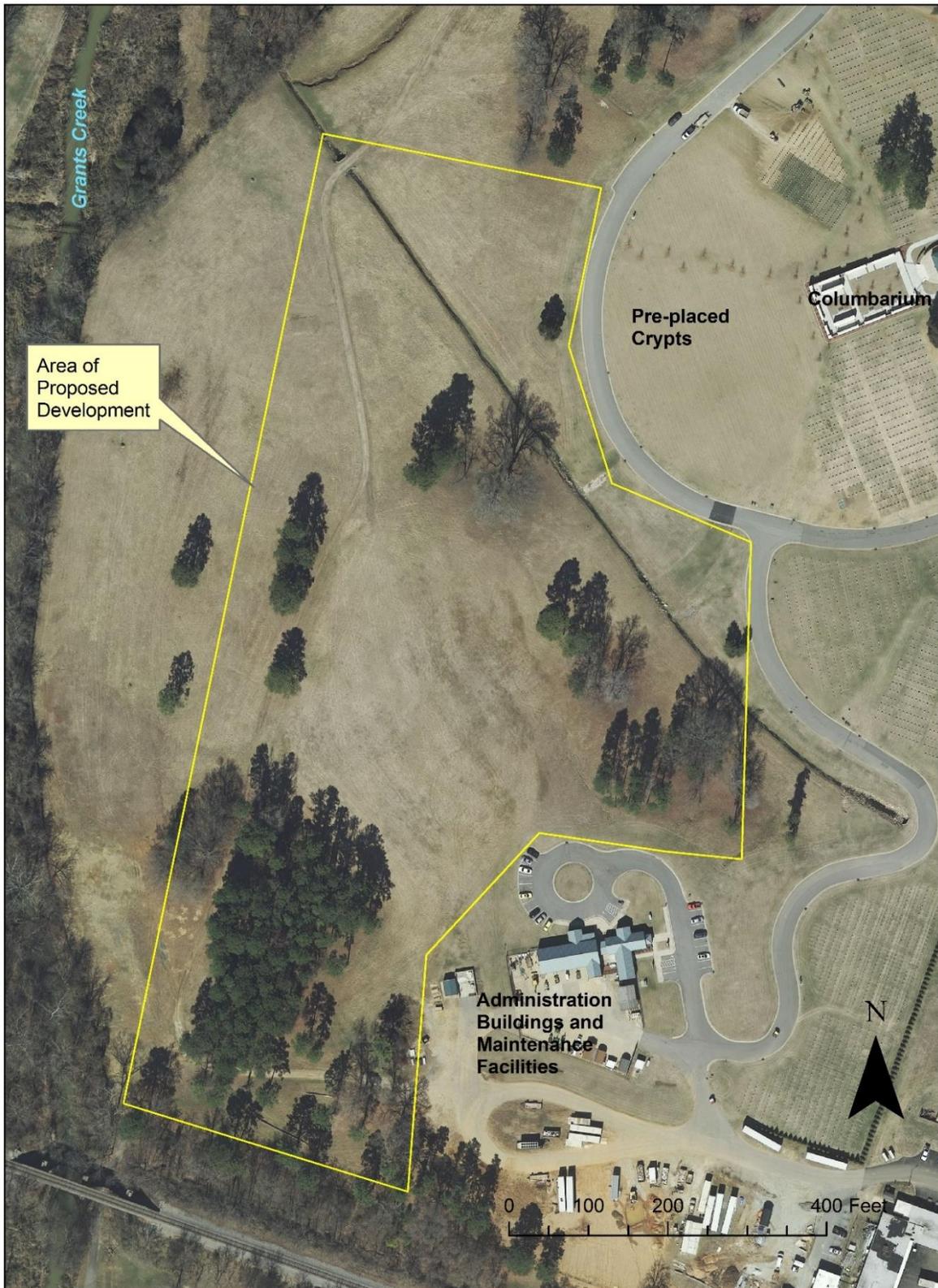


Figure 3. Proposed project site



1.2 Purpose and Need

The purpose of the Proposed Action is to enable VA to provide eligible veterans and their families in North Carolina with National Cemetery capacity. Burial at a National Cemetery is an earned benefit provided to veterans through the VA.

The Proposed Action is needed to meet the VA NCA's goal of increasing burial options in areas with an unserved or underserved veteran population, as specified by Congress. The increased capacity of the SNC would help the VA comply with the Servicemembers Civil Relief Act (SCRA).

One of the main objectives for VA burial programs is to ensure that burial needs of Veterans and eligible family members are met. NCA further defines this objective on the assumption that the burial needs of a Veteran are met if they have reasonable access to burial option, where reasonable access to a burial option is defined as "...a first interment option (whether for casketed remains or cremated remains, either in-ground or in columbaria) in a National or State Veterans Cemetery available within 75 miles of the Veteran's place of residence."

In 2014 there were 881 burials at the SNC, and 882 in 2015. At current rates of demand, the supply of pre-placed crypt casketed sites will be exhausted by approximately August 2021. Traditional casketed burial sites are anticipated to be depleted by October 2017. In-ground cremains sites will be exhausted by June of 2017. Additional capacity for cremains is being immediately addressed with a small ongoing project that is anticipated to extend that capacity for approximately 2 additional years. Columbarium sites are anticipated to be depleted by September 2018.

The Proposed Action will address the need for interment capacity within the next decade. Without increased capacity at the SNC, there is no other open National Cemetery in North Carolina. The closest National Cemetery to Salisbury that has remaining in-ground burial sites available is Florence National Cemetery in South Carolina, over 125 miles from Salisbury. Without expansion of capacity at SNC, there will not be a nearby existing veterans' cemetery that can accommodate the burial needs of veterans residing in North Carolina.

2.0 ALTERNATIVES

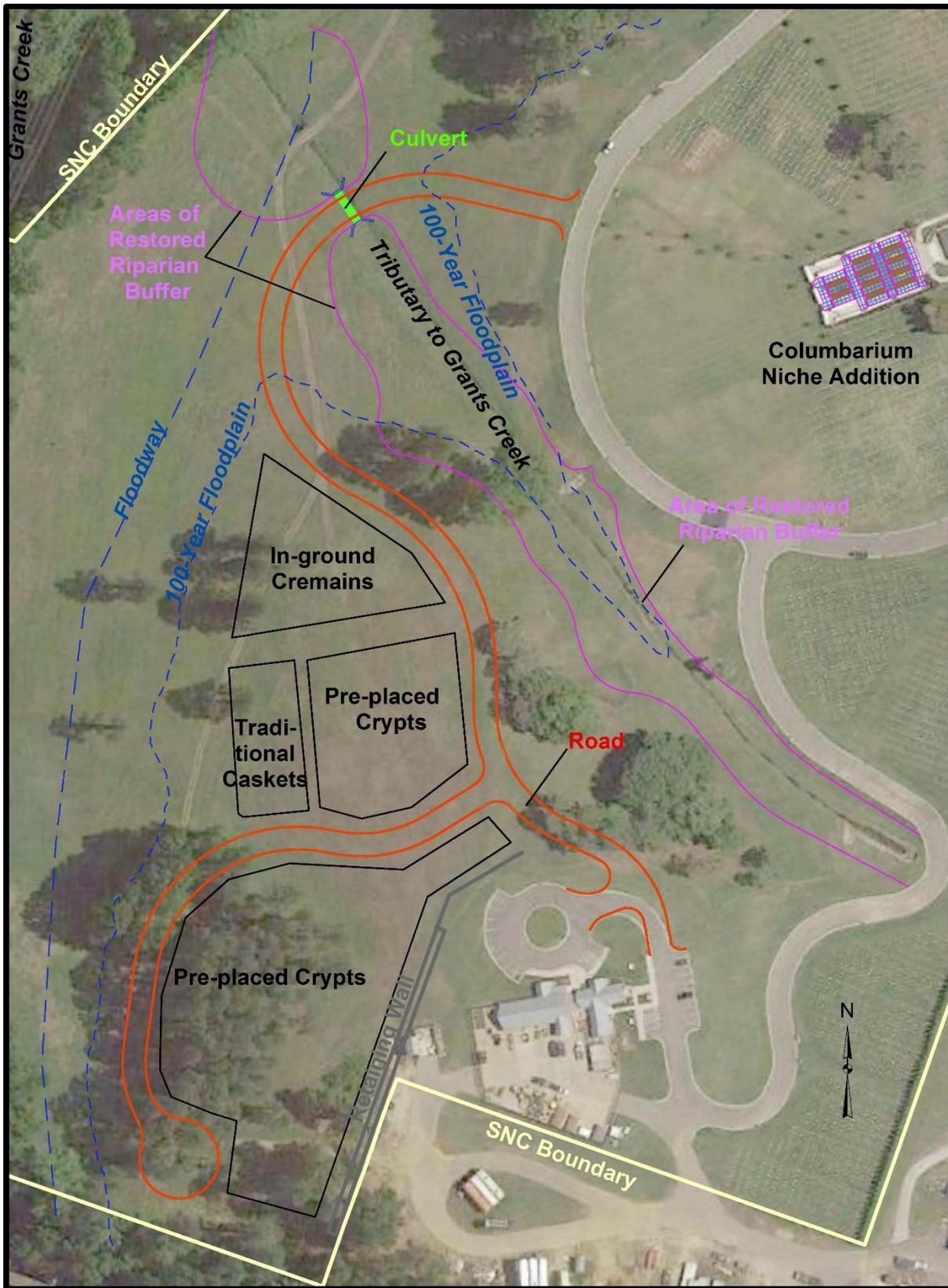
Two alternatives have been developed for the EA analysis: the “null” or *No-Action Alternative*, and the *Preferred Alternative: Development of 14 Acres at SNC*.

Each of the two alternatives address the 14-acre parcel at the western parcel. Currently, the 14-acre parcel is characterized by undeveloped field and woodland. The existing topography is shown on a figure in Appendix C.

The *No-Action Alternative* would be ongoing operation of the SNC without development of the 14-acre parcel. The 14-acre parcel would remain vacant in its current state. The VA would maintain possession of the land to provide a buffer to the cemetery. This alternative will not meet the purpose and need for the proposed project.

The *Preferred Alternative: Development of 14 Acres* includes development of the 14 acres adjacent to the developed portion of the cemetery to provide additional interment capacity (Figure 4). Development of the cemetery expansion would include the construction of burial facilities and required supporting infrastructure for cemetery operations and maintenance, such as roadways, retaining walls, utility systems, irrigation, site furnishings, signage and landscaping. Because of the constraints from existing facilities, hill slopes, and the 100-year floodplain of Grants Creek, only a single design concept is being considered. Development would require excavation and grading, construction of cemetery facilities and supporting infrastructure, and landscaping. This alternative will meet the purpose and need for the proposed project.

Figure 4. Preferred Alternative preliminary design concept



3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES OF THE ALTERNATIVES

This section analyzes the potential environmental effects of the two alternatives. First, the existing environmental resource is succinctly described. Second, the potential consequences of implementation of the two alternatives are analyzed.

The terms “effect” and “impact” are synonymous as used in this EA and can be considered either beneficial or adverse. Table 1 provides a summary of potential environmental effects of the proposed alternatives to the environment. The terms direct, indirect, and cumulative are used in the table to describe the environmental effects. The following definitions as defined in NEPA (40 CFR 1508) are:

- **Direct effects** – those effects which are caused by the action and occur at the same time and place as the action.
- **Indirect effects** – those effects which are caused by the action and occur later in time or further removed in distance, but are still reasonably foreseeable and causally linked to the action.
- **Cumulative effects** – impacts to the environment which result from incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such actions.

The effects / impacts are further characterized by their relative magnitude and for this EA are separated into three categories:

- Areas of No or Negligible Impacts
- Areas of Minor, Less Than Significant Impact
- Areas of Potentially Significant Impact

The term “significant” has specific meaning as defined in NEPA (40 CFR 1508.27) that includes both context and intensity. Table 1 lists the relative magnitude of potential impacts for each aspect of the affected environment.

Effects are also expressed in terms of duration. Definitions for short-term and long-term are:

- **Short-term** – used here to indicate the time interval during which construction is ongoing, until the proposed facility improvements have been implemented.
- **Long-term** – time interval after action has been implemented, following active construction, during which there are only normal operations and maintenance.

Table 1. Environmental Effects

Effects	Alternatives							
	No Action			Development of 14 Acres				
	Short Term	Direct	Long-Term Indirect	Cumulative	Short Term	Direct	Long-Term Indirect	Cumulative
Aesthetics	N	N	N	N	I	N	N	N
Air Quality	N	N	N	N	I	N	N	N
Cultural Resources	N	N	N	N	N	N	N	N
Geology and Soils	N	N	N	N	I	I	N	I
Hydrology and Water Quality	N	N	N	N	I	I	N	N
Wildlife and Habitat	N	N	N	N	I	I	N	N
Noise	N	N	N	N	I	I	N	N
Land Use	N	N	N	N	N	N	N	N
Floodplains and Wetlands	N	N	N	N	I	I	N	N
Socioeconomic	N	N	N	N	I+	I+	I+	I+
Community Services	N	N	N	N	I	I	N	N
Solid Waste and Hazardous Materials	N	N	N	N	I	I	N	N
Transportation and Parking	N	N	N	N	I	N	N	N
Utilities	N	N	N	N	I	I	N	N
Environmental Justice	N	N	N	N	N	N	N	N
Other Environmental Concerns ⁽²⁾	N	N	N	N	I	I	N	N

Notes:

(1) For this table, the direct, indirect and cumulative short-term impacts are combined in a single "short term" category. This time period is approximately equivalent to duration of construction. Long-term impacts are divided into direct, indirect and cumulative. Long-term impacts occur after the project is implemented (post-construction).

(2) In this analysis, Other Environmental Concerns include irretrievable commitment of natural resources, unavoidable adverse impacts, relationship between short-term uses of the environment and maintenance and enhancement of long-term productivity, climate change and greenhouse gases.

Explanation:

N
Areas of negligible or no impact

I
Areas of minor, less than significant impact, primarily adverse

S
Areas of potentially significant impact, primarily adverse

I+
Areas of minor, less than significant impact, primarily beneficial

3.1 Aesthetics

The parcel to be considered for development is primarily visible from the developed portions of the SNC on the south, north and east sides of the parcel of interest. The parcel is also visible from several residences and currently vacant properties on the northwest and west. However, the topography and vegetation of the residential development restrict that view to a few viewpoints on the adjoining properties themselves. There is no lighting on the 14-acre parcel so that the parcel currently strongly supports night darkness.

Figure 5 is a photo of the view from adjacent residential property on the northwest. The apartment complex has views of previously developed areas of the SNC as well as the area that is proposed for development. Across Grants Creek to the west there is an existing condominium development, another parcel that is likely to be developed for residential use, and a third parcel that is owned by the Rowan County YMCA, but the vegetation in the Grants Creek corridor is so thick that there is no clear view of the area proposed for development from those parcels. A map with parcel ownerships labeled is included in Appendix C.

Figure 5. View of area to be developed from adjacent residential development to the NW.



On the south boundary of the VA parcel is a relatively high railroad embankment and railroad bridge (historic) across Grants Creek. The embankment serves to block the view of the proposed project footprint from Kelsey Scott Park and other properties on the southern side of the railroad embankment. There is a paved trail from Kelsey Scott Park that crosses under the railroad bridge and dead ends at a gate in the fence surrounding the VA property, shown in Figure 6.

Figure 6. View of area to be developed from the SW corner of VA property.



Figures 7 through 10 are photos of the area of the proposed project. They are taken from the existing road and form a relative panorama.

Figure 7. Proposed project area looking SSE



Figure 8. Proposed project area looking S



Figure 9. Proposed project area looking SW



Figure 10. Proposed project area looking WSW



3.1.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no changes to the visual setting. The impact of the *No-Action Alternative* would be negligible.

3.1.2 Effects of the *Preferred Alternative: Development of 14 Acres*

The *Preferred Alternative: Development of 14 Acres* would change from the natural topography and natural vegetation in the wooded area to an area of relatively flatter turf grass and retaining walls. Some of the area in the foreground of Figures 7 and 8, toward the camera from the woods but still on the far side of the stream, is not natural topography but is graded area that was filled with leftover fractured rock and soil from previous development of gravesites at the SNC. During short-term construction there would be excavation and construction equipment, which will be a minor, less than significant impact. Longer term development would include views of irrigated landscaping, interment sites, and access roads, a negligible impact.

3.2 Air Quality

The proposed project is not in a non-attainment area for any National Ambient Air Quality Standards (NCAQA, 2015; EPA, 2016a). There are no air emission sources or permits associated with the proposed project site.

3.2.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no changes to air quality. The impact of the *No-Action Alternative* would be negligible.

3.2.2 Effects of the *Preferred Alternative: Development of 14 Acres*

The *Preferred Alternative: Development of 14 Acres*, would have short-term minor, less than significant adverse impacts to air quality during construction, primarily fugitive dust issues. Also, the operation of construction equipment could result in a less than significant short-term increase in emissions of hydrocarbons and carbon monoxide. In order to minimize dust, hydrocarbon and carbon monoxide emissions, Best Management Practices (BMPs) and equipment operation and maintenance procedures would be adopted and all construction activities would be performed in accordance with Federal and State air quality requirements. The operation of the site would result in emissions from visitor's vehicles; however, these emissions would not be different than those currently occurring because the planned project will not increase the rate (number of burials/day) of interments. The proposed project will not have a significant adverse effect on the air quality of the area. The *Preferred Alternative: Development of 14 Acres* would have negligible long-term impacts to air quality.

3.3 Cultural Resources

The SNC western parcel is eligible for Listing in the National Register of Historic Places as a federally established national cemetery. The North Carolina Department of Natural and Cultural Resources State Historic Preservation Office (SHPO) also considers the SNC western parcel property to be a contributing element of the potentially eligible Veterans Administration Hospital Historic District (Appendix A). No cultural resources or artifacts have been identified at the site except for those associated with the cemetery itself. The proposed project development is in a previously undeveloped portion of the cemetery.

3.3.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no changes to cultural resources. The impact of the *No-Action Alternative* would be negligible.

3.3.2 Effects of the *Preferred Alternative: Development of 14 Acres*

The North Carolina Department of Natural and Cultural Resources State Historic Preservation Office has found that the *Preferred Alternative: Development of 14 Acres* will not adversely affect the SNC or the surrounding contributing elements for the potentially eligible Veterans Administration Hospital Historic District (Appendix A). There will be no short term, long term, direct, indirect or cumulative impacts.

3.4 Geology and Soils

The SNC western parcel is within the Charlotte Terrane, comprised of locally highly metamorphosed (migmatitic) basic igneous and metamorphic rocks (Hibbard and other, 2007). These rocks were formed in a Neoproterozoic magmatic-arc system, a crustal block from a peri-Gondwanan setting. Subsequent Alleghenian orogenic deformation and erosion resulted in the complex, heavily faulted bedrock that has been subsequently intruded and hydrothermally altered. These rocks have been intensively eroded in place for a long period of time, resulting in the Piedmont Physiographic Province. The Piedmont is a relatively high, flat plateau on a regional scale, although dissected and hilly on a local scale.

There are two main soil units within the area of potential development. Within the valley of the small tributary to Grants Creek and that portion influenced by the floodplain of Grants Creek is *Chewacla loam, 0 to 2 percent slopes, frequently flooded* (USDA, 2016)(Appendix C). The parent material for this unit is loamy alluvium derived from igneous and metamorphic rocks, such as that on the hills above the level that is influenced by the streams. On the hill tops and hill slopes are *Enon fine sandy loam 2 to 8 percent slopes* and *Enon fine sandy loam 8 to 15 percent slopes* (USDA, 2016) (Appendix C). These soils are developed from a saprolite derived from metamorphosed basic igneous and metamorphic rocks.

The *Chewacla loam* is prime farmland if drained and protected from flooding, whereas the *Enon fine sandy loam* is areas of prime farmland and farmland of statewide importance (USDA, 2015) (Appendix C). Though this is not significant for the project in terms of the Farmland Protection Policy Act because the site is within the city limits of Salisbury and is considered to be already developed, it is useful information concerning vegetation and maintenance of vegetation on those soils.

Site geotechnical surveys in 2016 (Terracon, 2016) found that the typical residual soil profile was comprised of clayey soils near the surface where soil weathering is more advanced, underlain by sandy silts and silty sands that generally become harder with depth to the top of the parent bedrock. The boundary between the soil and rock in the Piedmont is not sharply defined, but forms a transitional zone termed “partially weathered rock” overlying the parent bedrock. Alluvial soils were found in the single boring along the tributary to Grants Creek and clearly within the floodplain of Grants Creek. In portions of the proposed site Terracon encountered fill materials related to previous development within the SNC.

3.4.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no changes to the site. The impact of the *No-Action Alternative* would be negligible.

3.4.2 Effects of the *Preferred Alternative: Development of 14 Acres*

The conceptual design shown on Figure 4 includes excavation of soils and potentially minor excavation of the underlying weathered bedrock. Excavation depths are anticipated to be approximately 10.5 feet for the pre-placed crypts, which require deeper excavation than traditional

burials and in-ground cremains. It is anticipated that up to 12 feet will need to be excavated as foundation for the roadway bridge crossing the tributary to Grants Creek. Soil profiles and soil-forming process would be disturbed by development of the site. Neither the soil units and bedrock formations nor topography of the site are rare or unique in the Salisbury vicinity.

BMPs will be employed to minimize soil erosion during construction and final vegetation of the development will limit the potential for long-term soil erosion. The *Preferred Alternative: Development of 14 Acres*, would have minor, less than significant impacts short-term impacts during construction, and continued minor, less than significant direct and cumulative long-term impacts to soils and topography.

3.5 Hydrology and Water Quality

The site is located within the Yadkin – Pee Dee River Watershed, in a portion of North Carolina that receives approximately 42.05 inches of precipitation annually (Southeast Regional Climate Center, 2016). Relative high groundwater and stream levels are in April and May, and low levels in November and December, reflecting the seasonal high and low rates of precipitation.

There is a tributary to Grants Creek that crosses the proposed project site, and a small portion of the proposed project footprint is within the 100-year floodplain of Grants Creek. There is no surface water level or flow monitoring available for the tributary to Grants Creek. Anecdotal information from the SNC staff indicates that the tributary to Grants Creek will rise as much as 1.5 to 2 feet in the spring. Flow data for Grants Creek has been calculated by analogy with an adjacent stream that has a USGS stream gage (NCDWQ, 2002).

No surface water quality data for the un-named tributary to Grants Creek was found. Historically, surface water quality in Grants Creek has been determined to be impaired and not totally supporting of all beneficial uses. A Total Maximum Daily Load (TMDL) was developed and approved in September of 2002 for fecal coliform for the full length of Grants Creek, 17.9 miles from source to Yadkin River (NCDWQ, 2002). A TMDL was developed and approved in September of 2006 for turbidity on a reach of Grants Creek that starts 1.76 miles downstream of the confluence of the SNC tributary to Grants Creek that and continues for 4.2 miles to the confluence of Grants Creek with the Yadkin River (NCDWQ, 2006). On the 2014 *North Carolina Water Quality Assessment for the Integrated Report / 305(b)*, the reach of Grants Creek into which the SNC tributary to Grants Creek flows, shows a category rating of “2 – Supporting” of beneficial uses (NCDWR, 2014) (Appendix C). Grants Creek is Class C, (NCDWR, 2016), which means that the state requires standard Best Management Practices (BMPs) for development along the stream, but does not have site-specific restrictions, such as stream buffer requirements.

The Land Trust for Central North Carolina has been compiling a stream corridor of land parcels and conservation easements along Grants Creek. They have a stream corridor conservation easement on the parcel owned by the Rowan County YMCA, which is directly west across the stream from the portion of the SNC western property that bounds Grants Creek (Addison Davis, program director, Land Trust for Central North Carolina, personal communication). Their work compiling property and conservations easements along Grants Creek is supported and partially funded by the Clean

Water Management Trust Fund (CWMTF). CWMTF funds projects are intended to enhance or restore degraded waters, develop riparian buffers, provide buffers around military bases, and protect ecologically diverse or historical properties (CWMTF, 2016).

The Geotechnical Investigation in early November of 2015 found the groundwater level at 4.5 feet below the ground surface (approximately 648 feet above mean sea level) at the boring location adjacent to the tributary to Grants Creek. The borings at higher elevations on the hills were not sufficiently deep to encounter groundwater.

There are two aquifers, the saprolite aquifer overlying the fractured bedrock aquifer (Groves, 1976). Relevant groundwater quality data for the proposed project footprint is not publicly available. There are local groundwater quality issues, including reports of groundwater contamination at the Hefner VA Medical Center (EDR, 2016a), which could potentially impact groundwater on the site. Tom Lee, Safety Manager at the Hefner VA Medical Center (personal communication) reports that recent groundwater monitoring at their site has not revealed ongoing groundwater issues. There are two permanent groundwater wells at the Hefner VA Medical Center that were originally drilled to support the Chiller Plant, but are now used only to fill the pond when it gets low. The remainder of water at the Hefner VA Medical Center is provided by City of Salisbury.

There are additional local groundwater quality issues in the vicinity (EDR, 2016a), but these are down-gradient to site groundwater and therefore cannot impact the site. Since the SNC western parcel gravesite has been developed since 1999, no groundwater quality issues are anticipated (Spongberg and Becks, 2000) related to previous burials.

3.5.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no changes to the site. The impact of the *No-Action Alternative* would be negligible.

3.5.2 Effects of the *Preferred Alternative: Development of 14 Acres*

Grading and landscaping may reduce surface water runoff within the developed areas of the project, increasing infiltration to groundwater, and decreasing erosion, which would provide positive effects to groundwater and surface water quality and quantity. However, irrigation required for landscaping will increase consumption and evapotranspiration, particularly during relatively dry times of year. The net impact will likely be a minor, not significant impact to ground and surface water.

Rowan County requires a 30-foot buffer zone along the margins of all natural watercourses. The *Preferred Alternative: Development of 14 Acres* will meet all appropriate and relevant requirements for stream crossings for the proposed bridge over the un-named tributary to Grants Creek.

It is anticipated that potable water facilities in the proposed project footprint will be provided by hook-up or extension of City of Salisbury water service. If groundwater from on-site will be used for landscape irrigation, it is recommended that water samples be tested for the full suite of

constituents of concern that have potentially impacted groundwater at the Hefner VA Medical Center.

During construction, BMPs will be employed to minimize erosion and sediment in surface water runoff. Any activity that may impact Waters of the United States within the site would require the issuance of permits under Section 404 of the Clean Water Act. The current conceptual design includes a roadway crossing of the tributary to Grants Creek, which will require permitting. Control of storm water and erosion runoff effects on water quality would require a National Pollutant Discharge Elimination System (NPDES) permit. A subsurface drainage system would be incorporated into the design, as required, to isolate the burial grounds from the groundwater in compliance with the National Cemetery Administration Facilities Design Guide (VA, 2010b).

3.6 Wildlife and Habitat

The site is within the Southern Outer Piedmont ecoregion of North Carolina (Griffith and others, 2002). The majority of the area of the proposed project footprint is mapped as “Developed – Open Space”, with the core of the small wooded area in the southwest corner mapped as a combination of *Southern Piedmont Dry Oak – (Pine) Forest - Loblolly Pine Modifier* and *Southern Piedmont Dry Oak - (Pine) Forest – Hardwood Modifier* and the edges of the small wooded area mapped as *Disturbed/Successional – Shrub Regeneration* (USGS, 2011).

Investigations of vegetation in the proposed project footprint (FourFront, 2015) (Appendix C) confirmed this general woody vegetation in the small wooded area in the southwest corner of the proposed project footprint. The majority of the site was in hay/pasture as early as at least 1948 (USGS, 1948), and likely much earlier. The non-wooded areas that make up the majority of the proposed project footprint is tilled/cultivated and mowed grasses, primarily a tall fescue mix.

There are no critical habitats within the area of the proposed project (USFWS, 2016a) (Appendix C). There is potential for one federally listed threatened species and one endangered species (Table 2), and no proposed or candidate species that use habitat within the vicinity of the proposed project site (USFWS, 2016a) (Appendix C).

Table 2. Federally Listed Threatened and Endangered Species Potentially in the Vicinity of the Proposed Project Site

Species	Status	Habitat Requirements	Is habitat found on site?
Schweinitz’s Sunflower (<i>Helianthus schweinitzii</i>)	Endangered	Clearings in upland piedmont woods	No
Northern Long-eared Bat (<i>Myotis septentrionalis</i>)	Threatened	Summer: reproductive females in trees near streams, non-reproductive females and males in caves/mines Winter: caves/mines (hibernacula)	No

(USFWS, 1994; USFWS, 2015)

US Fish and Wildlife Service (Appendix B) states that, “According to our records and a review of the information you provided, no federally listed endangered or threatened species or their habitats occur in the project area. Therefore, we believe the requirements under Section 7 of the (*Endangered Species*) Act are fulfilled.”

A query of the North Carolina Natural Heritage Program database found no records for rare species, important natural communities, natural areas, or conservation/managed areas within the proposed project boundary (Appendix C). The following state species of concern could potentially be found on site if there were suitable habitat (Table 3). Site investigations showed that suitable habitat for these species is not present on site.

Table 3. State Species of Concern Potentially in the Vicinity of the Proposed Project Site

Species	Status	Habitat Requirements	Is habitat found on site?
Mole Salamander (<i>Ambystoma talpoideum</i>)	S2S3 G5	Floodplain forests near gum and cypress ponds	No
Rota’s Feather Moss (<i>Brachythecium rotaenum</i>)	S1 G3G4	On bark or rock in cove forests; coastal forests	No
Piedmont Quillwort (<i>Isoetes piedmontana</i>)	S2 G3	Wet outcrops	No

(AmphibiaWeb, 2016; NCNHP, 2016; NatureServe, 2016a; NatureServe, 2016b)

Notes:

- G5 S5 -- Common, widespread, and abundant (although it may be rare in parts of its range). Not vulnerable in most of its range.
- G4 S4 -- Apparently secure, though it may be quite rare in parts of its range, and/or suspected to be declining.
- G3 S3 -- Potentially at risk because of limited and/or declining numbers, range and/or habitat, even though it may be abundant in some areas.
- G2 S2 -- At risk because of very limited and/or potentially declining population numbers, range and/or habitat, making it vulnerable to global extinction or extirpation in the state.
- G1 S1 -- At high risk because of extremely limited and/or rapidly declining population numbers, range and/or habitat, making it highly vulnerable to global extinction or extirpation in the state.

The urban/suburban character of the area surrounding the site includes residential development, a major highway and secondary roads, industrial and commercial developments, the Hefner VA Medical Center and the existing cemetery. This developed setting is conducive to supporting opportunistic wildlife such as various species of songbirds, small mammals, reptiles, or other animals adapted to urban/suburban environments. There are larger areas of unbroken habitat across the railroad embankment to the south and across Grants Creek to the west. The chain-link fence on the southern and western boundaries of the VA parcel likely reduces the number of larger animals (deer) that traverse the property.

Executive Order 11986, Exotic Organisms, addresses requirements related to the control of exotic species. Exotic and invasive species are those plants or animals which are not native to North Carolina, but were introduced as a result of human-related activities. Both common English ivy and kudzu were noted during the site reconnaissance, and are listed as “Rank 1 – Severe threat” exotic weeds in North Carolina (NCNPS, 2016).

3.6.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no changes to the site. The impact of the *No-Action Alternative* would be negligible.

3.6.2 Effects of the *Preferred Alternative: Development of 14 Acres*

Since the site does not contain any listed vegetative species and does not provide critical habitat for listed species, potential impacts to protected wildlife and habitat are not expected. Within the 14-acre proposed project footprint there will be loss of approximately 0.7 acre of trees and shrubs and the associated habitat. There will be minor mortality or displacement of wildlife (small mammals, etc.) related to construction activities.

The existing vegetation would be changed to a managed landscape, with non-native turf grass, roads and sidewalks on a large portion of the parcel of interest. Vegetation management during and after construction would preclude colonization by invasive species.

The *Preferred Alternative: Development of 14 Acres*, would have minor, less than significant short term and long-term direct adverse impacts to wildlife and habitat.

3.7 Noise

The site is relatively urban/suburban, with residential development, a major highway and secondary roads, commercial development and the existing National Cemetery in the near vicinity. Normal operations at the cemetery include gun salutes associated with most interments. There are also periodic ground maintenance activities that produce noise, such as lawnmowers, leaf-blowers, etc.

Noise-sensitive receptors are defined as properties where frequent human use occurs and where a lowered noise level would be of benefit. There are three noise sensitive receptors in the vicinity of the site: the cemetery itself, the Hefner VA Medical Center, and residential development west of the cemetery.

3.7.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no changes to the site. The impact of the *No-Action Alternative* would be negligible.

3.7.2 Effects of the *Preferred Alternative: Development of 14 Acres*

The 14-acre parcel of interest is currently vacant. Construction and development of the parcel would provide short-term construction noise. Long-term impacts would include increased noise of ground maintenance operations. Therefore, the *Preferred Alternative: Development of 14 Acres*, would have minor, less than significant adverse impacts to noise levels.

3.8 Land Use

The parcel of interest is located within the City of Salisbury (City of Salisbury, 2016). The land adjacent to the north and east is developed VA National Cemetery and medical facilities. There are residential developments to the west, as well as areas of undeveloped land. Some of the undeveloped land has been placed in conservation easements and protected status (Appendix C). The parcel is bound on the south by a railroad line. Across the railroad embankment and right-of-way there is a city park.

3.8.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no changes to land use. The impact of the *No-Action Alternative* would be negligible.

3.8.2 Effects of the *Preferred Alternative: Development of 14 Acres*

The *Preferred Alternative: Development of 14 Acres*, as visualized by the conceptual design in Figure 4, would include a change of the currently vacant land status to an active cemetery facility. This is a land use considered to be compatible with the adjacent cemetery, Hefner VA Medical Center and residential areas. There will be no development in the relatively wide area of the 100-year floodplain and the riparian vegetation surrounding Grants Creek, which will serve as a buffer between the active cemetery and the conserved open space and park areas west of Grants Creek and south of the railroad embankment. Therefore the impact of the *Preferred Alternative: Development of 14 Acres* is considered to be negligible.

3.9 Floodplains and Wetlands

Although there are no on-site wetlands that have been identified by the National Wetlands Inventory within the parcel of interest (USFWS, 2016b) (Appendix C), onsite investigations found in-stream and fringe wetlands associated with the tributary to Grants Creek. A map of approximate area of wetlands is included in Appendix C. The tributary, with in-channel and fringe wetlands, is shown in Figures 11 and 12.

Figure 11. Tributary to Grants Creek looking upstream (SSE)



Figure 12. Tributary to Grants Creek looking downstream (NNW)



There is an area of 100-year floodplain associated with Grants Creek and following the course of the tributary to Grants Creek into the area of the proposed project footprint (Figure 4). The 100-

year floodplain of Grants Creek is shown on the Federal Emergency Management Agency (FEMA) flood plain panel 3710575000J (FEMA, 2009) (Appendix C), as well as Rowan County maps (Rowan County, 2016) (Appendix C).

3.9.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no changes to floodplains or wetlands in the parcel of interest.

3.9.2 Effects of the *Preferred Alternative: Development of 14 Acres*

The *Preferred Alternative: Development of 14 Acres*, as visualized by the conceptual design in Figure 4, includes roadway and a new bridge across the tributary to Grants Creek. It is anticipated that there will be approximately 0.04 acres of permanent impacts to wetlands. When design is finalized, a wetland delineation and wetland impacts will be permitted, as required.

Preliminary design suggests that fill will be placed within the 100-year floodplain of Grants Creek for the roadbed and bridge foundation. When design is finalized, flood modelling and a more precise calculation of the area of impacts within the 100-year floodplain will be required for permitting.

There will be an additional area of temporary impacts to the wetlands and 100-year floodplain during construction. The existing culvert will be removed, which will restore a small area of wetlands and remove a small amount of fill from the 100-year floodplain. The impacts of the *Preferred Alternative: Development of 14 Acres* would be minor.

3.10 Socioeconomics

The socioeconomic setting for the proposed project site is described in Tables 4 and 5. The proposed project site is located within the city limits of Salisbury, in Rowan County, North Carolina.

Table 4. Demographic Data for City of Salisbury Compared to County, State and National

Location	Total Population (2014)	Population 65 years and older	Population under age 18 years	Minority Population	High School Graduates	Veterans 2009-2013
Census Tract ⁽¹⁾				32.3%		
City of Salisbury	33,710	15.9%	22.7%	47.6%	80.4%	2,634
Rowan County	138,630	16.3%	22.8%	19.9%	81.0%	10,374
North Carolina	9,943,964	14.7%	23.0%	28.5%	84.9%	724,295
United States	318,857,056	14.5%	23.1%	22.6%	86.0%	21,263,779

(1) Refers to the Census Tract in which the proposed project is located, 37159505. Only minority and poverty data are available at Census Tract data through readily available sources.

(2) Statistics for City of Salisbury are from 2010; all others are 2014

(3) (US Department of Commerce Census Bureau, 2016a and 2016b)

Table 5. Economic Data for City of Salisbury Compared to County, State and National

Location	Number of Households 2009-2013	Median Household Income 2009-2013	Population Below Poverty Level 2009-2013	Unemployment Rate (November 2015)
Census Tract ⁽¹⁾			20.0%	
City of Salisbury	12,097	\$34,959	24.8%	6.3%
Rowan County	52,300	\$41,495	18.8%	5.6%
North Carolina	3,715,565	\$46,334	17.5%	5.5%
United States	115,610,216	\$53,046	15.4%	5.0%

(1) Refers to the Census Tract in which the proposed project is located, 37159505. Only minority and poverty data are available at Census Tract data through readily available sources.

(2) (US Department of Labor Bureau of Labor Statistics, 2016; US Department of Commerce Census Bureau, 2016b)

3.10.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no changes to socioeconomic variables in the vicinity of the proposed project site. At some future time, the capacity for interment at the SNC would be exhausted, and veterans and their families would encounter a potential economic hardship without local burial benefits.

3.10.2 Effects of the *Preferred Alternative: Development of 14 Acres*

The *Preferred Alternative: Development of 14 Acres* would have a short-term minor, less than significant positive economic benefit through construction work. There would be a long-term minor, less than significant positive direct, indirect and cumulative economic benefit for veterans and their families through the availability of local burial benefits, and to the community related to the draw of visitors to the cemetery.

3.11 Community Services

The City of Salisbury provides the site vicinity with water, sewage, stormwater infrastructure, fire, rescue and police services. The closest fire station is the City of Salisbury Fire Station #3, at 1604 West Innes Street, 0.6 miles from the entrance to SNC. There is a central police station in Salisbury at 130 East Liberty Street, approximately 2.2 miles from the entrance to SNC. The parcel of interest is already owned by the Federal government, so there will be no change in tax revenues.

3.11.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no changes to requirements for community services in the vicinity of the proposed project site.

3.11.2 Effects of the *Preferred Alternative: Development of 14 Acres*

The *Preferred Alternative: Development of 14 Acres* would have negligible impacts on fire, rescue and police services. The proposed project will use City of Salisbury water services for irrigation. There will be no net increase in wastewater service to the cemetery since there will be no net increase in the rate of interments. The proposed project will not change or increase the stormwater loads or decrease stormwater runoff quality to the stormwater infrastructure of the City. There will be increased requirements for water service for irrigation of the newly developed area. There will be a minor, not significant impact to community services from the proposed project.

3.12 Solid and Hazardous Materials

There are no significant asbestos, lead paint or hazardous materials issues related to the proposed project footprint. There are currently no structures within the footprint. There is a soil and gravel road and culvert with endwalls. There is a pile of stored rocks behind the administration and maintenance facility but no solid waste within the parcel.

The SNC staff member in charge of environmental records and hazardous materials handling, Tim Jones, provided environmental record files for the SNC to Hyalite Environmental personnel for review. The latest environmental audits at the facility found no significant issues.

Twenty aerial photos of the site, from 1948 through 2015, were examined for any evidence of problematic land use. 1948 and 1950 aerial photos show areas of fields with a few two-tracks through them. The Hefner VA Medical Center was not developed on the adjacent land until 1953. Aerial photos from 1960 to present all show evidence of the dirt road and culvert over the unnamed tributary to Grants Creek in the western portion of the proposed project footprint. There are also some round areas in the pasture area that likely are related to the use of the parcel as a golf course by the VA Medical Center (tee boxes and greens). There is no evidence of problematic land use.

A full Phase I Environmental Site Assessment to fulfill the “all appropriate inquiries” rule of the US Environmental Protection Agency (EPA, 2014) was not performed for this NEPA analysis, since there is no transfer of land associated with the proposed actions. However, regulatory records were searched to identify any potential hazardous materials issues (EDR, 2016a). Historic aerial photos and Sanborn Fire Insurance maps were reviewed to identify any potentially problematic past uses of the 14-acre parcel (EDR, 2016b and 2016c).

A search of government data records indicated that there were at least two historic confirmed releases from underground storage tanks located on the SNC western property. Each of the releases was subsequently investigated and remediated to the point where the regulatory agency classified the status as “Closed Out”, indicating that there was no reason for further concern, investigation or remediation of the incidents. The close-out dates were 1997 and 1998, indicating these issues were from before the SNC had received the property from the Hefner VA Medical Center. The records further indicate that the historic underground storage tanks previously located at the SNC western property have been removed.

There have been at least eleven confirmed releases or spills of hazardous materials at the Hefner VA Medical Center (EDR, 2016a). At least nine of these releases were subsequently investigated and remediated to the point where the regulatory agency classified the status as “Closed Out”, indicating that there was no reason for further concern, investigation or remediation of the incidents. There is multiple reporting and confusion between facility IDs and incident IDs in the records, but it appears that there may be two incidents that are not officially “Closed Out”. These two incidents each had reported dates for clean-up, one in 1998 and the other in 1987. It is unlikely to still be an active issue, and is more likely a reporting or record-keeping issue.

Personal communication with the Safety Manager at the Hefner VA Medical Center revealed that there is an additional current/ongoing Leaking Underground Storage Tank remediation project at the site that did not show up in the government database searches (Tom Lee, Safety Manager, Hefner VA Medical Center). The site has been cleaned up and is in post-cleanup monitoring. It has not yet been closed, but most recent monitoring has shown no remaining groundwater issues. Records of these incidents, investigation of impacts and evidence of remediation have been requested from the Hefner VA Medical Center.

As mentioned previously in the Hydrology section of the text, Hyalite Environmental is not aware of any groundwater quality data from the proposed project footprint. Reported and recorded groundwater issues, with the exception of those at the Hefner VA Medical Center (EDR, 2016a), are

in down-gradient or sufficiently distant locations that they cannot impact the proposed project site. The Hefner VA Medical Center groundwater issues are (a) cleaned up and (b) sufficiently distant that they will not impact the project site (Tom Lee, Safety Manager, Hefner VA Medical Center). Records that will document this have been requested.

3.12.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no changes to solid or hazardous materials issues on the parcel of interest.

3.12.2 Effects of the *Preferred Alternative: Development of 14 Acres*

There will be short-term minor, less than significant impacts related to solid waste due to construction of the *Preferred Alternative: Development of 14 Acres* due to clear and grub operations. The solid waste issues will be minimized and mitigated by appropriate standard operating procedures and BMPs.

3.13 Transportation and Parking

There is currently a dirt two-track road and a culvert crossing the un-named tributary to Grants Creek accessing the proposed project footprint. Access to the SNC western property is controlled on the south and west by fencing, and is adjacent to the Hefner VA Medical Center on the north and east.

3.13.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no changes to transportation or parking issues related to the parcel of interest.

3.13.2 Effects of the *Preferred Alternative: Development of 14 Acres*

Due to construction of the *Preferred Alternative: Development of 14 Acres* there will be short-term minor, less than significant adverse impacts to transportation and parking. Long-term, there will be new internal access roads and parking constructed to serve development of the 14 acres. The expansion will be served by the existing external accesses to the SNC. There will be negligible long-term additional traffic or parking since there is currently no anticipated increase in interment rates related to the planned project.

3.14 Utilities

The 14-acre parcel is currently undeveloped and has no power, water, wastewater or phone services. The following utility providers service the site and surrounding areas:

Utility Type:	Company
Electricity:	Duke Energy
Natural Gas:	Piedmont Natural Gas
Water:	City of Salisbury
Wastewater:	City of Salisbury
Telephone:	CenturyLink

Solid waste and recycling services are provided by the City of Salisbury, and were addressed previously under the section concerning solid and hazardous waste.

3.14.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no changes to utilities related to the parcel of interest.

3.14.2 Effects of the *Preferred Alternative: Development of 14 Acres*

The *Preferred Alternative: Development of 14 Acres* will cause short- and long-term, minor, less than significant direct and cumulative impacts to utility services and utility consumption, primarily related to increased demand for irrigation water and power to distribute that irrigation water. New connections to utilities service providers will be required.

3.15 Environmental Justice

Executive Order 12898 “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” was enacted in 1995 to focus Federal agencies’ attention on the environmental and human health conditions in minority communities and low-income communities with the goal of achieving environmental justice. Under this Executive Order, Federal agencies must identify and address the human health or environmental effects of its actions on minority and low-income populations.

For this analysis, data on minority and low income populations within the community (census tract) was compared to data available for the City, County, State and Nation. This data is displayed in Tables 4 and 5. According to that data, the vicinity of the proposed project (census tract) has a relative minority population much larger than that of the County, State or Nation, but smaller than the overall minority population of the City of Salisbury. There is a relative low-income population in the vicinity of the site (census tract) that is a larger than that of the County, State or Nation, but smaller than the percentage of the population that is below the poverty level in the City of Salisbury as a whole.

3.15.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no changes to environmental justice issues related to the parcel of interest.

3.15.2 Effects of the *Preferred Alternative: Development of 14 Acres*

The *Preferred Alternative: Development of 14 Acres* will have no or negligible environmental justice impacts. Though there is a relatively high concentration of minorities and poverty in the vicinity of the site (census tract), the percentages are smaller than those for the City of Salisbury as a whole. The expansion of the cemetery would not change the current level of environmental or human health conditions within the communities near the proposed project. The proposed project does not create an undue burden on minority or low-income populations.

3.16 Other Environmental Concerns

NEPA requires additional consideration of:

- Irreversible and irretrievable commitments of resources that would be involved in the proposed action should it be implemented (42 USC Ch. 55 Subchap. I Sec. 4332 C(v));
- Relationship between short-term uses of the environment and maintenance and enhancement of long-term productivity (42 USC Ch. 55 Subchap. I Sec. 4332 C(iv));
- Unavoidable adverse impacts (42 USC Ch. 55 Subchap. I Sec. 4332 C(ii));
- Climate change and green-house gases (CEQ, 2010).

3.16.1 Effects of the *No-Action Alternative*

Under the *No-Action Alternative* there would be no irreversible and irretrievable commitments of resources; no short-term use of the environment or enhancement of long-term productivity. However, there would be the unavoidable adverse impact of failure of VA's mission to provide burial benefits to veterans and their families in North Carolina.

The potential impact of climate change to the *No-Action Alternative* would be the gradual natural changes in native flora and fauna. A change in average precipitation amounts could affect the level of groundwater, and flow in Grants Creek and the un-named tributary. The *No-Action Alternative* would have no impact on concentrations of green-house gases.

3.16.2 Effects of the *Preferred Alternative: Development of 14 Acres*

Under the *Preferred Alternative: Development of 14 Acres* there will be minor, less than significant irreversible and irretrievable commitments of resources in the resources and energy consumed by construction, operations and maintenance of the expansion of the SNC. The NCA commits to perpetual maintenance of the facility, so that development of the parcel as National Cemetery will perpetually remove the parcel from any other potential uses. The primary unavoidable adverse impact of the *Preferred Alternative: Development of 14 Acres* is the commitment of ongoing energy and water for operations and maintenance of the facility.

The potential impact of climate change to the *Preferred Alternative: Development of 14 Acres* would be the gradual natural changes in the native flora and fauna. Changes in climate may increase or decrease efforts required for maintenance of landscaping, or require a modification of landscaping. There will be minor, less than significant emissions of greenhouse gases from equipment during construction, and ongoing lower levels of emissions from operations and maintenance equipment and visitor vehicles. The removal of approximately 0.7 acres of trees and shrubs will provide net decrease in biomass of vegetation, providing a minor, less than significant decrease in carbon sequestration. None of the actions considered under this NEPA analysis would generate sufficient greenhouse gas emissions to require a quantitative study.

3.17 Potential for Generating Substantial Controversy

The SNC expansion is consistent with local land use and is perceived as a positive addition to the community. There are no major issues that would generate negative public perception and reaction to the Proposed Action. The agencies that have responded to a request for input regarding the Proposed Action have not raised any issue that would be considered contentious. Considering these factors, significant public controversy is not anticipated for the Proposed Action. The Draft EA was published and available for a 30-day public comment period. No public comments were received (Appendix D).

4.0 PUBLIC INVOLVEMENT

Appendix B includes correspondence with Federal, State and Local Agencies. Appendix A contains records of Section 106 National Historic Protection Act and Native American consultation.

The VA published and distributed the Draft EA for a 30-day public comment period. A Notice of Availability (NOA) was published in a local newspaper (Appendix D). Hardcopies of the Draft EA were available at the SNC Administration Building and the Rowan County Public Library for review. The document was available for review online through the VA's website at www.cem.va.gov/cem/EA.

Since no substantive comments (in fact, no comments at all) were received and no additional analyses were requested, the comment period is considered complete and a Notice of Finding of No Significant Impact (FONSI) will be issued.

5.0 MITIGATION

A summary of example BMPs and mitigation measures to avoid and reduce to less than significant levels the potential adverse impacts identified for the Proposed Action are presented in this following table. These BMPs will be implemented throughout construction of the cemetery expansion and later operations and management of the cemetery. This list presents examples – there are many more BMPs and mitigation measures that may be employed.

**Table 6. Best Management Practices / Environmental Protection Measures
Incorporated into the Proposed Action**

(Note: This list is an example, not an exhaustive list of all possibilities.)

Resource Area	Best Management Practice / Environmental Protection Measure
Aesthetics	Design of the cemetery expansion will be consistent with surrounding landscape and local regulations
	Incorporate existing large trees into the cemetery design wherever possible.
	Use the topography and vegetative buffers to enhance viewscales.
	Use lighting that will minimize light pollution.
Air Resources	Use appropriate dust suppression methods during construction activities. Some common methods available include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspension of earth-moving activities during high wind conditions.
	Maintain an appropriate speed to minimize dust generated by vehicles and equipment on unpaved surfaces.
	Cover haul trucks with tarps.
	Stabilize previously disturbed areas through re-vegetation or mulching if the area would be inactive for several weeks or longer.
	Visually monitor all construction activities regularly, particularly during extended periods of dry weather, and implement dust control measure when appropriate.
	Ensure that equipment is appropriately used and maintained to minimize emissions.
Cultural Resources	Should human remains or other potentially historic or culturally significant items be discovered during project construction, the construction contractor would immediately cease work until VA, and qualified experts, as applicable, have been contacted and evaluated the find.
Earth Resources	Create and maintain a tree-lined border to minimize visual impacts of topographic changes.
	Design paved areas to drain to storm water management systems to reduce soil erosion.
	Install and monitor erosion-prevention measures (BMPs), in accordance with the Erosion Control Plan. Re-spread stockpiled topsoil and seed / re-vegetate areas temporarily cleared of vegetation.

Resource Area	Best Management Practice / Environmental Protection Measure
	Retain on-site vegetation to the maximum extent possible.
	Maintain <i>in situ</i> soil profiles to the maximum extent possible.
	Use native vegetation to re-vegetate disturbed soils to the maximum extent possible.
	The construction contractor would obtain all required permits before any proposed construction activities commence and would adhere to permit conditions during all on-site construction activities.
Water Resources	Avoid Waters of the US (un-named tributary to Grants Creek) and maintain a vegetated buffer for the stream.
	Design and implement 100-year storm volume storm water retention basins
	Maintain and properly use equipment, herbicides, pesticides and fertilizers to avoid spills or releases of petroleum products or other hazardous substances.
	Create and implement a design that will protect groundwater resources.
	Use design, best available technologies, BMPs, and operation controls, as possible, to minimize irrigation water use.
	Implement erosion and sedimentation controls to comply with Federal, State and Local permitting and programs.
Biological Resources	Construction should be timed, to the maximum extent possible, to avoid wildlife impacts.
	Tree and shrub removal will need to be timed to non-nesting season to be in compliance with the Migratory Bird Treaty Act.
	Use landscape materials that will minimize the need for herbicides or pesticides, and consider potential forage issues.
	Protect vegetative buffers and maintain natural vegetation if possible
	Maintain site to reduce invasive species.
Noise	Coordinate proposed construction activities in advance with adjacent sensitive receptors (residences, VA medical facility and the operating portions of the National Cemetery). This should include public outreach and communications through signage, local media and the cemetery administration.
	Locate stationary equipment and select material transportation routes as far away from sensitive noise receptors as is possible.
	Shut down noise-generating heavy equipment when it is not needed.
	Maintain and properly use equipment to reduce noise.
	Create Standard Operating Procedures to operate equipment in the quietest manner possible.
	Limit gun salute noise impacts from ceremonial rifle salutes by conducting salutes during daytime hours between 7:00AM and 4:00PM. Limit the number of salutes to 3 to 5 rifles during an individual committal ceremony.
	Maintain a tree-lined site perimeter to further reduce noise impacts beyond the site.

Resource Area	Best Management Practice / Environmental Protection Measure
Solid and Hazardous Materials	Comply with existing VA Standard Operating Procedures and applicable Federal and state laws governing the use, generation, storage, or transportation of solid or hazardous materials.
	If hazardous substances are released to the site during construction or operation, these applicable Federal and State requirements must be followed in response and cleanup.
	Avoid or limit the use of hazardous materials, including building material products, during construction and operation of the National Cemetery
	Establish re-use / re-purpose / recycle protocols to the maximum extent possible.
Transportation and Parking	Use Traffic Impact Analysis to identify the level of transportation conditions and recommended improvements.
	Coordinate with the State, County, and City road departments to ensure construction and operational traffic are considered in the planning of future transportation improvement in the vicinity of the site.
	Ensure that debris and/or soil is not deposited on local roadways during construction.
	Ensure construction activities do not adversely affect traffic flow on local roadways; construction traffic should be timed to avoid peak travel hours.
Utilities	Submit design plans to each utility provider to determine specific connections requirements and implement the necessary connection requirements.
	Employ low energy consumption and low water consumption methods, to the maximum extent possible.

6.0 ENVIRONMENTAL PERMITS REQUIRED

For the *No-Action Alternative* no environmental permits will be required.

The *Preferred Alternative: Development of 14 Acres* will require environmental permitting for potential impacts to Waters of the US and wetlands related to the construction of the new bridge and roadway accessing the new gravesites. Depending upon final design, actions within the 100-year floodplain may trigger the requirement for floodplain permitting. Construction will require a Storm Water Pollution Prevention Plan (SWPPP). Non-environmental permits, such as construction permits from the City of Salisbury, may be required.

7.0 CONCLUSIONS

This EA has been prepared pursuant to NEPA to evaluate the environmental impacts associated with the *Preferred Alternative: Development of 14 Acres* adjacent to the previously developed and operating SNC, at 501 Statesville Boulevard, Salisbury, North Carolina. The purpose of the Proposed Action is to enable VA to provide eligible veterans and their families in North Carolina with National Cemetery capacity to serve the projected needs of the area.

The Proposed Action is needed to meet the VA's National Cemetery Administration's goal of increasing burial options in areas with an unserved or underserved Veteran population, as specified by Congress. Burial at a National Cemetery is an earned benefit provided to Veterans through the VA.

The resources evaluated in this EA include: aesthetics; air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat; noise; land use; floodplains and wetlands; socioeconomics; community services; solid and hazardous waste; transportation and parking; utilities; environmental justice; and additional issues identified by NEPA.

Based on the analysis presented in this EA and preliminary coordination with public agencies, it is expected that the Proposed Action would not have a significant impact on these resources. Any potential impact would be avoided or mitigated through the implementation of BMPs and compliance with statutory and regulatory processes already in place in the State of North Carolina. Therefore, since after the 30-day public comment period on the Draft EA, no substantive comments were received and no additional analyses were requested, a notice of Finding of No Significant Impact (FONSI) will be issued and an Environmental Impact Statement will not be required.

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10.0 LIST OF ACRONYMS AND ABBREVIATIONS

Abbreviation	Acronym
BMP	Best Management Practice
CEQ	President’s Council on Environmental Quality
CFR	Code of Federal Regulations
CWMTF	Clean Water Management Trust Fund
EA	Environmental Assessment
EDR	Environmental Data Resources, Inc.
EPA	United States Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
NCA	National Cemetery Administration
NCDAQ	North Carolina Division of Air Quality
NCDWQ	North Carolina Division of Water Quality
NCDWR	North Carolina Division of Water Resources
NCNHP	North Carolina Natural Heritage Program
NCNPS	North Carolina Native Plant Society
NEPA	National Environmental Policy Act of 1969
NOA	Notice of Availability
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRHP	National Register of Historic Places
SCRA	Servicemembers Civil Relief Act

List of Acronyms and Abbreviations

Abbreviation	Acronym
SNC	Salisbury National Cemetery
SHPO	State Historic Preservation Office
SWPPP	Surface Water Pollution Prevention Plan
USC	United States Code
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VA	Department of Veterans' Affairs