

**Tiered Environmental Assessment for
Phased Development at the
Tahoma National Cemetery
Kent, Washington**

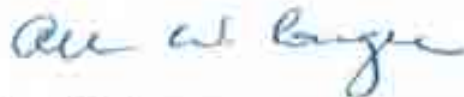
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ABSTRACT

The United States Department of Veterans Affairs (VA), National Cemetery Administration (NCA), operates the Tahoma National Cemetery, located in Kent, Washington. Originally opened in 1997, the Tahoma National Cemetery was the twelfth busiest cemetery in the National Cemetery system in FY2008 and is currently the only national cemetery in Washington State. The NCA is projecting gravesite depletion in currently developed areas of the cemetery by approximately 2016. In general accordance with the Master Plan for the entire 159-acre cemetery, the VA's Office of Construction and Facilities Management (CFM) proposes the phased development of approximately 15 to 20 acres of the 101 undeveloped acres remaining at the existing cemetery site. The CFM is the arm of the VA responsible for executing the NCA's major construction projects. The proposed expansion primarily consists of the development of two new burial areas to provide approximately 21,000 gravesites for both casketed and cremated remains.

The National Environmental Policy Act (NEPA) requires by law that the VA evaluate any effect its actions might have on the environment. This Tiered Environmental Assessment (EA) serves the purpose of meeting that requirement. The Tiered EA approach is recommended for this project since the VA already owns the property proposed for development, the cemetery is currently in operation, and given that an Environmental Impact Statement (EIS) was completed in 1991 during the selection process for this site to serve as a National Cemetery for veterans in this area. The Tiered EA is being prepared to evaluate environmental criteria at the proposed development areas, within the existing cemetery boundaries, that may have changed since the completion of the 1991 EIS.

The Tahoma National Cemetery is located at 18600 SE 240th Street in Kent, King County, Washington. Two areas, totaling 52 acres, within the existing boundaries of the cemetery are included in this evaluation for the proposed Phase 2 expansion. In addition to the acreage planned for burial areas, the evaluation includes additional undeveloped property that is not currently designated as burial space. The development areas are located in the southeastern corner of the property and the central-western portion of the property. They primarily consist of undeveloped woodlands, with the exception of a previously-cleared, grassy field in the southeastern development area and a cleared area in the central-western development area currently used as a storage area for excess soils being generated at a Phase 1 burial area. The areas surrounding the Tahoma National Cemetery primarily consist of undeveloped woodlands and low-density residential properties, with Tahoma High School located immediately to the southwest of the cemetery.

The purpose of the proposed project is to enable the existing national cemetery to continue to provide burial services for eligible veterans in the Puget Sound area of Washington State. The proposed development will provide an additional 10 years of continued burial service to an estimated veteran population of approximately 390,000 who are served by the Tahoma National Cemetery. It is the policy of the NCA to provide a burial facility within 75 miles of a significant veteran population. The nearest open national or state veteran cemeteries are Willamette National Cemetery in Portland, Oregon (approximately 170 miles south of Seattle) and Roseburg National Cemetery in Roseburg, Oregon (approximately 350 miles south of Seattle). However, Roseburg National Cemetery is currently closed to first interments. Without additional development of burial areas at the existing Tahoma National Cemetery, there will not be a readily-accessible public veterans' cemetery that can accommodate the burial needs of the estimated 390,000 veterans residing in Seattle, Tacoma and surrounding areas.

The proposed Phase 2 development will require the conversion of approximately 10-15 acres of currently forested land within the existing cemetery boundary. This development is expected to result in minor and/or predominately short-term impacts to some environmental criteria reviewed in this Tiered EA, including wetlands, air quality, soils, hydrology, noise, and vegetation and wildlife. However, many of these impacts were anticipated and included in the 1991 EIS for the development of a National Cemetery in this area and unavoidable impacts will continue to be mitigated through the implementation of Best Management Practices (BMPs). As specific design plans are advanced for the Phase 2 burial areas, additional consideration will be given to areas of concern identified in this report, including; erosion and sediment control, stormwater control and wetlands protection. Since cemetery development will be conducted in accordance with the US Department of Veterans Affairs (VA) design standards, in accordance with federal law, and with appropriate site-specific mitigation measures (as discussed in the 1991 EIS and this Tiered EA), the impacts associated with the study area should be minimal. The analysis is consistent with finding of no significant impact for the preferred alternative (Alternative A).

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List of Acronyms and Abbreviations

AQCR	Air Quality Control Region
AMEC	AMEC Earth & Environmental, Inc.
amsl	above mean sea level
APE	Area of Potential Effect
bgs	below ground surface
BMPs	Best Management Practices
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CFM	Construction and Facilities Management, Office of
CFR	Code of Federal Regulations
CIS	Commission on Indian Services
CO	Carbon monoxide
CWA	Clean Water Act
CZMA	Federal Coastal Zone Management Act
DNR	Department of Natural Resources, Washington State
EA	Environmental Assessment
EDR	Environmental Data Resources, Inc.
EO	Executive Order
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
GIS	Geographic Information System
MACTEC	MACTEC Engineering and Consulting, Inc.
NAAQS	National Ambient Air Quality Standards
NCA	National Cemetery Administration
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
PM	Particulate Matter
ppm	parts per million
RPA	Registered Professional Archaeologist
SHPO	State Historic Preservation Officer
USACE	U.S. Army Corps of Engineers
USCB	U.S. Census Bureau

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List of Acronyms and Abbreviations (continued)

USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geologic Survey
UST	Underground Storage Tank
VA	U.S. Department of Veterans Affairs
WDE	Washington Department of Ecology

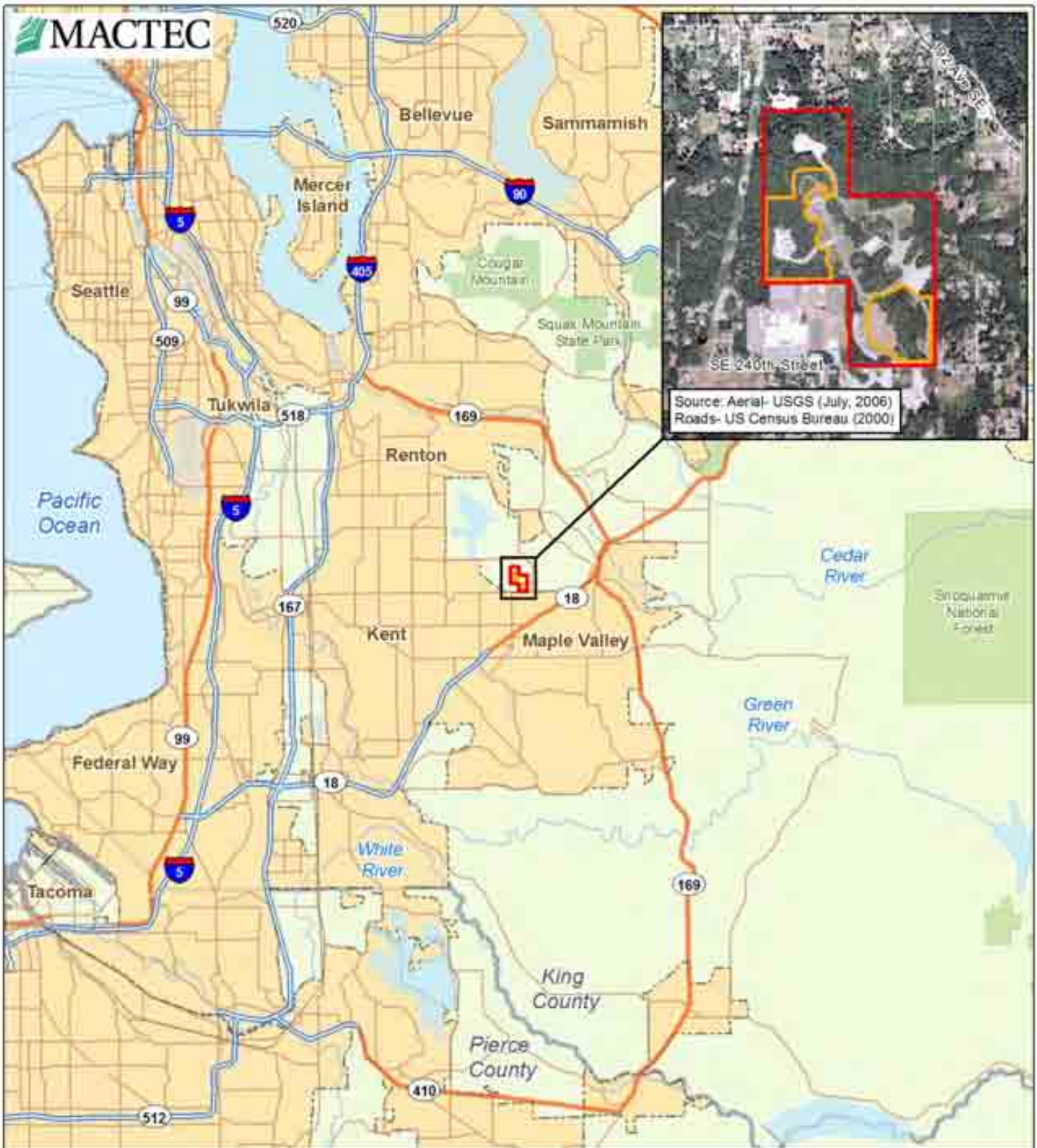
1.0 EXECUTIVE SUMMARY

Background

The United States Department of Veterans Affairs (VA), National Cemetery Administration (NCA), maintains the Tahoma National Cemetery, located at 18600 SE 240th Street in Kent, King County, Washington (Figure 1-1). Originally opened in 1997, the Tahoma National Cemetery was the twelfth busiest cemetery in the National Cemetery system in FY2008 and is currently the only national cemetery in Washington State. The NCA is projecting gravesite depletion in currently developed areas of the cemetery by approximately 2016. In coordination with the NCA, the VA's Office of Construction and Facilities Management (CFM) is responsible for executing major construction projects. In general accordance with the Master Plan for the entire 159-acre cemetery, the CFM proposes the phased development of approximately 15 to 20 acres of the 101 undeveloped acres remaining at the existing cemetery site. The proposed expansion primarily consists of the development of two new burial areas to provide approximately 21,000 gravesites for both casketed and cremated remains.

The proposed action is for the next phase of development at the existing Tahoma National Cemetery. The CFM is evaluating environmental criteria at the proposed development areas within the existing cemetery boundaries, focusing on criteria that may have changed since the completion of an Environmental Impact Statement (EIS) prepared in 1991 during the cemetery siting process. Two areas, totaling 52 acres, within the existing boundaries of the cemetery are included in this evaluation for the proposed Phase 2 expansion. The evaluation includes areas of wetlands and associated buffers, as well as additional undeveloped property that is not currently designated as burial space. The development areas are located in the southeastern corner of the property and the central-western portion of the property. They primarily consist of undeveloped woodlands, with the exception of a previously-cleared, grassy field in the southeastern development area and a cleared area in the central-western development area currently used as a storage area for excess soils being generated at a Phase 1 burial area. The areas surrounding the Tahoma National Cemetery primarily consist of undeveloped woodlands and low-density residential properties, with Tahoma High School located immediately to the southwest of the cemetery (Figures 1-1 and 1-2).

The purpose of the proposed action is to enable the existing national cemetery to continue to provide burial services for eligible veterans in the Puget Sound area of Washington State. In 2008 the cemetery conducted a total of 2,667 interments and was ranked the twelfth busiest national cemetery within the VA system, based on burial workload. Veteran deaths have been increasing as the very large population of World War II and Korean War-era veterans continue to advance in age. This progressive increase in veteran deaths results in a corresponding increase in the demand for burial services in national cemeteries. One of the strategic goals of the NCA is to assure that the



Source: Aerial- USGS (July, 2006)
Roads- US Census Bureau (2000)

LEGEND

- National Cemetery Property Boundary
- Proposed Phase 2 Development Area



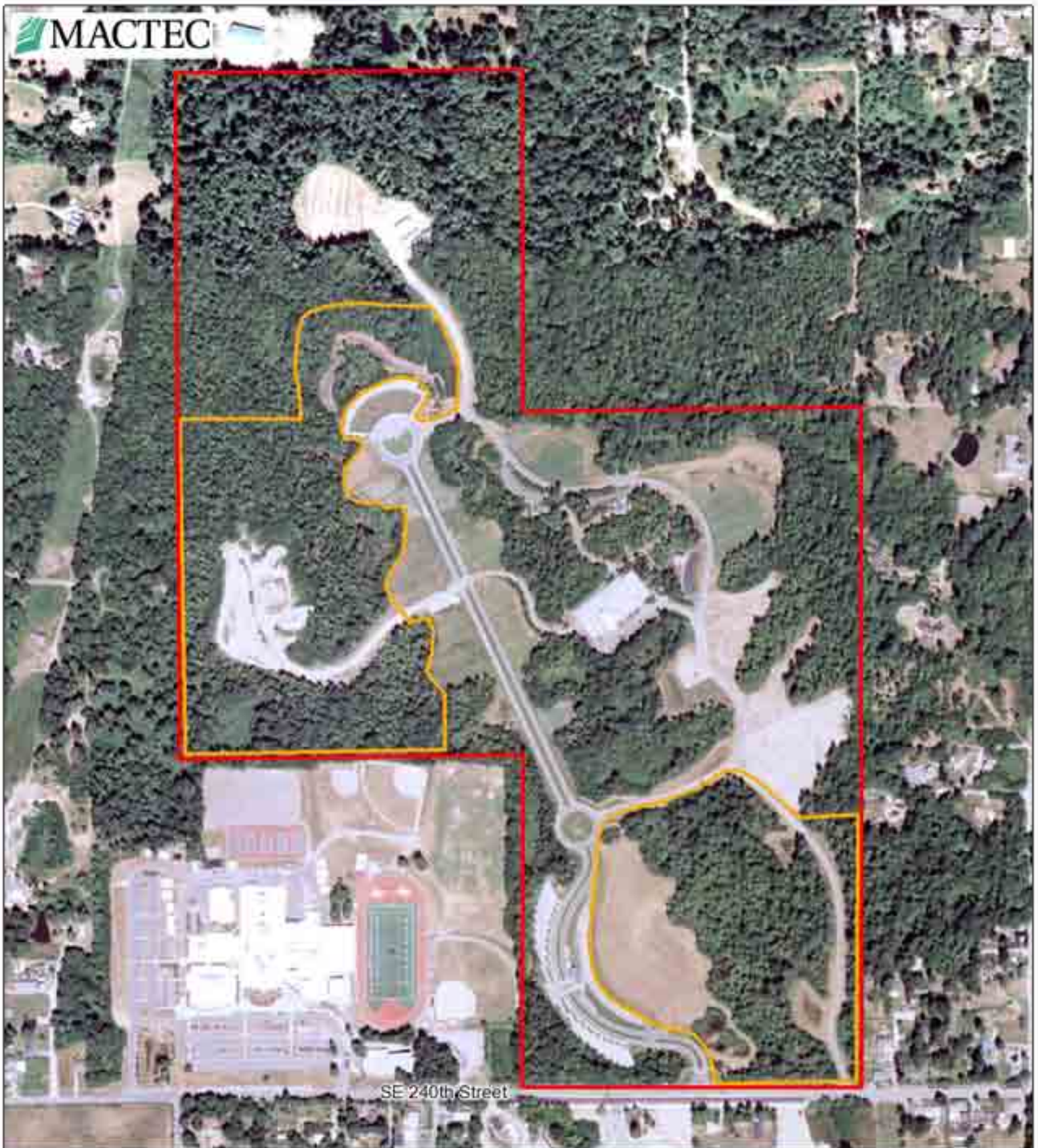
Source:
ESRI (2005)
US Census Bureau (2000)
USGS (2004)

Created by: CGS
Approved by: KMR
March 10, 2010



**Figure 1-1:
Project Location Map**

Tahoma National Cemetery
Proposed Phase 2
Development Area
Tahoma, WA



SE 240th Street

LEGEND

- ▭ National Cemetery Property Boundary
- ▭ Proposed Phase 2 Development Area



Created by: CGS
 Approved by: KMR
 March 10, 2010

Source: Aerial- USGS (July, 2006)
 Roads- US Census Bureau (2000)



**Figure 1-2:
 Aerial Photograph**

Tahoma National Cemetery
 Proposed Phase 2
 Development Area
 Tahoma, WA

burial needs of veterans are met. The NCA is projecting gravesite depletion in currently developed areas of the Tahoma National Cemetery by approximately 2016. The proposed Phase 2 development would enable the cemetery to meet burial needs for an additional ten years.

The NCA is responsible for providing burial services to eligible veterans and family members pursuant to the provisions of the National Cemeteries Act of 1973 and other statutory authority and regulations. It is the policy of the NCA to provide a burial facility within 75 miles of a veteran population. The nearest open national or state veteran cemeteries are Willamette National Cemetery in Portland, Oregon (approximately 170 miles south of Seattle) and Roseburg National Cemetery in Roseburg, Oregon (approximately 350 miles south of Seattle). However, Roseburg National Cemetery is currently closed to first interments. Without additional development of burial areas at the existing Tahoma National Cemetery, there will not be a readily-accessible public veterans' cemetery that can accommodate the burial needs of the estimated 390,000 veterans residing in Seattle, Tacoma and surrounding areas.

The National Environmental Policy Act (NEPA) requires by law that the VA evaluate any effect its actions might have on the environment. This Tiered Environmental Assessment (EA) serves the purpose of meeting that requirement. The detailed planning and design phase of the project may not be finalized until after the completion of the NEPA process. Therefore, specific details about how the areas might be developed for burials are not currently available. However, cemetery development typically occurs in phases limited to new burial sections and the infrastructure required for those sections. Development of the expansion areas is likely to occur in more level areas that are not designated as wetlands or associated buffers. Although minor and unavoidable impacts to wetlands are anticipated to occur in selected areas in order to allow safe access to and efficient development of the proposed new burial areas. This Tiered Environmental Assessment found that the development of the proposed expansion areas would not have a significant long-term adverse impact on the environment. The evaluation that forms the basis of that conclusion is described in detail in the following sections of this report.

Location/History

Tahoma National Cemetery is located approximately 20 miles southeast of Seattle and approximately 20 miles northeast of Tacoma in King County, Washington. Situated on nearly 160 acres purchased from the State of Washington in 1993, the cemetery initially opened for interments on October 1, 1997. Tahoma National Cemetery conducted a total of 2,667 interments in 2008 and nearly 25,000 interments since opening in 1997. Tahoma National Cemetery ranks first in cremation inurnment workload, with approximately 68% of 2008 interments consisting of this type of service.

Description of Alternatives

With approximately 101 acres of undeveloped property available for cemetery development within the boundaries of the existing national cemetery property, the CFM did not consider the expansion of the Tahoma National Cemetery outside its existing boundaries or the development of a new cemetery in the service area as viable or feasible alternatives to meet the needs of the veterans in the Puget Sound area. This EA contains a detailed analysis of two alternatives including the No Action alternative.

Alternative A – Phase 2 Development:

Two areas within the existing boundaries of the cemetery will be studied for the proposed Phase 2 expansion. A total of 52 acres is included in this evaluation. In addition to the acreage planned for burial areas, the evaluation includes areas of wetlands and associated buffers, as well as additional undeveloped property that is not currently designated as burial space. The development areas are located in the southeastern corner of the property and the central-western portion of the property. They primarily consist of undeveloped woodlands, with the exception of a previously cleared, grassy field in the southeastern development area and a cleared area in the central-western development area currently used as a storage area for excess soils being generated at a Phase 1 burial area. Although detailed plans for the layout, design and specifications for the proposed expansion areas may not be finalized until after the NEPA process has been completed, development of the two new burial areas are expected to provide approximately 21,000 gravesites for both casketed and cremated remains. In addition to the proposed burial areas, the project will also include associated infrastructure (roadways, irrigation, etc.) and landscaping, as well as the addition of several memorial walls, a Scattering Garden/Ossuary, and renovations to existing cemetery signage and site furnishings.

Alternative B – No-Action Alternative:

The No-Action Alternative would involve ceasing the phased development approach at the Tahoma National Cemetery. This approach will effectively result in the early closure of the cemetery, as gravesite depletion in currently developed areas of the cemetery is estimated by approximately 2016. The No-Action Alternative will allow for only about five more years of first interment burial service to the estimated 390,000 veterans currently residing in the Puget Sound area.

Basis for selection

The two proposed development areas were identified according to the phased-approach provided in the Tahoma National Cemetery Master Plan (JGM, Landscape Architects 1995). Based on the original Phase I development, these areas are the next logical extension for burial areas as they are adjacent to existing burial areas and will require the least amount of additional infrastructure, while

providing adequate burial services for an additional 10-year period. Property outside the existing cemetery boundaries was not evaluated, as additional land acquisition is not necessary when the VA has sufficient capacity for burial services within the current cemetery property.

Environmental Impacts

Alternative A – Phase 2 Development:

The 52 acres included in this evaluation are located within the boundaries of the existing Tahoma National Cemetery. Development of approximately 15 to 20 of these acres, predominately for additional burial areas, will occur in stages, beginning within the next four years. Minor impacts associated with construction and operation activities would be expected; however, a majority of these impacts can be limited through the use of best management practices (BMP's).

Based on the analyses completed for this report, areas of concern including aesthetics, air quality, community services, cultural and historical resources, economic activity, floodplains and wetlands, geology and soils, noise, land use, real property, resident population, solid and hazardous waste, traffic and transportation, utilities, vegetation and wildlife, and water resources will not be significantly impacted by the proposed action. The analysis for the project, including an assessment of cumulative impacts in the proposed development areas, is consistent with a finding of no significant impact.

Alternative B – No-Action Alternative:

Under the No-Action alternative, no impacts to the environment will occur on the property related to the actions of the Department of Veterans Affairs, with the exception of the continued activities at the existing developed portions of the Tahoma National Cemetery.

2.0 PROJECT PURPOSE AND DESCRIPTION OF NEED

2.1 Project Purpose

The National Cemetery Administration (NCA) is the entity within the U.S. Department of Veterans Affairs (VA) that is responsible for establishing and maintaining national cemeteries in order to provide reasonable access to burial benefits for veterans pursuant to the provisions of the National Cemeteries Act of 1973 and other statutes. Under this mandate, the NCA is responsible for the operation and maintenance of 123 existing national cemeteries. The Office of Construction and Facilities Management (CFM) provides design, major construction and lease project management, design and construction standards, and historic preservation services and expertise to the VA, in order to deliver high quality and cost effective facilities in support of the Nation's veterans. The CFM executes expansion and modernization projects for both NCA and Veterans Health Administration (VHA), as well as the construction of new national cemeteries and healthcare facilities.

NCA generally considers reasonable access to burial benefits to mean that a first interment option is available within 75 miles of the veterans' residence. Once the need is identified, CFM follows a multi-step process for building new national cemeteries or expanding existing cemeteries:

- Site selection process, including NEPA evaluations;
- Land acquisition;
- Master planning and design development;
- Construction documents preparation; and
- Construction award/completion.

The purpose of the proposed action is to fulfill a need for continued availability of a national veteran's cemetery to serve the Seattle-Tacoma metropolitan areas. This report is a Tiered Environmental Assessment (EA) to evaluate environmental criteria at the proposed development areas that may have changed since the completion of the 1991 Environmental Impact Statement (EIS) prepared as part of the original site selection process for establishing a cemetery in the Seattle-Tacoma area of Washington State. As conditions may change over time, it is more protective of the environment to perform an updated evaluation of existing conditions, prior to development, to take into account changes that may have occurred since the completion of the original EIS.

This report summarizes the findings of the 1991 EIS, compares previous findings to current conditions, and evaluates potential impacts as a result of the proposed action. The procedure used to complete this Tiered EA is consistent with the guidance detailed in the VA's "Environmental Compliance Manual" (VA, Office of Facilities Management, Landscape Architect Professional

Group, 1998). It is important to note that the project will likely only move forward if a "Finding of No Significant Impact" (FONSI) determination is made.

This Tiered EA was prepared in accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 Code of Federal Regulations [C §1 1500- 1508), and VA Regulations, Title 8 of the Code of Federal Regulations (CFR), Section 26.4 (a). The VA policy includes provisions to protect, restore and enhance the quality of the human environment; and to minimize adverse environmental consequences, consistent with other national policy considerations.

2.2 Description of Need

Veteran deaths have been increasing each year as World War II and Korean War-era veterans continue to advance in age. Based on the 1990 census, annual veteran deaths were expected to peak at 620,000 in the year 2008 before beginning a gradual, slow decline. This progressive increase in veteran deaths resulted in a corresponding increase in the demand for burial services in national cemeteries.

One of the strategic goals of the NCA is to assure that the burial needs of veterans are met. Experience and recent historical data show that over 80 percent of persons interred in national cemeteries resided within 75 miles of the cemetery at time of death. Based upon this experience, the NCA considers the burial needs of veterans to be met for those veterans that have reasonable access to a burial option. Reasonable access to a burial option means that a first interment option (whether for casketed remains or cremated remains, either in-ground or in columbaria) in a national or state veterans cemetery is available within 75 miles of the veteran's place of residence. For veterans in the Seattle-Tacoma metropolitan areas, the nearest open national or state veterans cemeteries are Willamette National Cemetery in Portland, Oregon (approximately 170 miles south of Seattle) and Roseburg National Cemetery in Roseburg, Oregon (approximately 350 miles south of Seattle). However, Roseburg National Cemetery is currently closed to new burials.

The VA National Cemetery Administration is projecting gravesite depletion in currently developed areas of the Tahoma National Cemetery by approximately 2016. In accordance with the Master Plan for the entire 159-acre cemetery, the NCA proposes the phased development of approximately 15 to 20 acres of the 101 undeveloped acres remaining at the existing cemetery site. The proposed expansion primarily consists of the development of two new burial areas to provide approximately 21,000 gravesites for both casketed and cremated remains. The proposed development will provide an additional 10 years of continued burial service to an estimated veteran population of approximately 390,000 who are served by the Tahoma National Cemetery.

3.0 DESCRIPTION OF PROJECT ALTERNATIVES

3.1 Tahoma National Cemetery

Situated on nearly 160 acres purchased from the State of Washington in 1993, the Tahoma National Cemetery opened for interments on October 1, 1997. In accordance with the phased-design of the Master Plan (JGM, Landscape Architects, 1995) for the entire 159-acre cemetery, the Phase I development of the cemetery consisted of nearly 60 acres and provided the first inventory of burial capacity, including buildings, committal shelters, entrance features, public assembly area, and supporting infrastructure. Based on current interment rates, the NCA is projecting gravesite depletion of the Phase I burial areas of the cemetery by approximately 2016.

In general accordance with the Master Plan, the CFM proposes the development of approximately 15 to 20 acres of the 101 undeveloped acres remaining at the existing cemetery site. The proposed development ensures that the eligible veterans of the Puget Sound area will have the opportunity to be laid to rest in a local National Veterans Cemetery at least until the year 2026. Although detailed plans for the layout, design and specifications for the proposed expansion areas may not be finalized until the NEPA process has been completed, development of the two new burial areas are expected to provide approximately 21,000 gravesites for both casketed and cremated remains. In addition to the proposed burial areas, the project will also include associated infrastructure (roadways, irrigation, etc.) and landscaping, as well as the addition of several memorial walls, a Scattering Garden/Ossuary, and renovations to existing cemetery signage and site furnishings.

3.2 Site Selection Process

3.2.1 Location

Ideally, cemetery development should be located within the existing cemetery property or as close as possible to the existing cemetery. In addition, alternative sites, when available, are evaluated according to size, shape, accessibility, utilities and water, and surrounding land use.

The selected site should be readily-accessible via highways and major public roadways. If public utilities (electricity, water, sewer) are immediately available to the site, that is ideal. However, on-site septic systems and on-site water wells may be acceptable. An adequate water supply, whatever the source, is also very important. Sites adjacent to visually objectionable, noisy, high traffic or other nuisance elements are avoided to maintain the desired decorum for the ceremonies. In addition, the site should be free of public easements and rights-of-way.

The site selection process for the Tahoma National Cemetery began in 1988 and a total of 22 sites were offered to the VA for consideration. A Selection Board established by the VA eliminated sites for not meeting appropriate criteria and systematically evaluated and graded the remaining sites. The four highest-ranking sites (Tahoma, Illahee, SeaTac and Sultan) were included as alternatives in the *Environmental Impact Statement for a National Cemetery to Serve the Seattle-Tacoma Metropolitan Area* (VA 1991). The Tahoma site was selected as the Preferred Alternative because it was determined to have the best combination of aesthetics, potential for development and accessibility by the major veteran population centers in Seattle and Tacoma. Concerns with the Tahoma site (proximity to the Tahoma High School, availability of public transportation and zoning) were not considered to be major. The Final EIS was published in October, 1991.

3.2.2 Site Characteristics

The inherent qualities of the site, including soils, topography, and aesthetics, should be such that it is conducive to potential cemetery development. Soils should be of a quality which will provide adequate topsoil for growing turf as well as adequate stability for constructing roads and buildings. Shallow depth to groundwater may require additional site preparation. An ideal site would be free of subsurface obstructions and hazardous waste.

Comparatively level to rolling terrain is desirable for areas to be developed. The grade of burial areas should be in the 2 to 15 percent range. There should be sufficient slope to enable proper drainage of the site. Ravines, wetlands, and sinkholes are avoided wherever feasible. Existing site amenities such as pleasant views and quality vegetative cover are sought. The presence of man-made elements such as cultural/historic/archaeological sites, utility easements, rights-of-way or mineral rights can hamper or legally prevent potential development.

3.3 Description of Alternatives

3.3.1 Alternative A – Phase 2 Development

Under Alternative A, the Tahoma National Cemetery would continue the phased development of the cemetery in general accordance with the Master Plan for the entire 159-acre property. The CFM would develop approximately 15 to 20 acres of the 101 undeveloped acres remaining at the existing cemetery site. The Phase 2 expansion primarily consists of the development of two new burial areas to provide approximately 21,000 gravesites for both casketed and cremated remains. Alternative A includes a total of 52 acres that are evaluated in this report. The evaluation includes areas of wetlands and associated buffers, as well as additional undeveloped property that are not currently designated as burial space. The development areas are located in the southeastern corner of the property and the central-western portion of the property (Figure 1-2). They primarily

consist of undeveloped woodlands, with the exception of a previously cleared, grassy field in the southeastern development area and a cleared area in the central-western development area currently used as a storage area for excess soils being generated at a Phase 1 burial area. The areas surrounding the Tahoma National Cemetery primarily consist of undeveloped woodlands and low-density residential properties, with Tahoma High School located immediately to the southwest of the cemetery.

3.3.2 Alternative B – No-Action Alternative

Under this alternative, the CFM would not develop additional burial areas at the existing national cemetery in Kent, Washington. Gravesite depletion in currently developed areas of the cemetery is estimated by approximately 2016. As burial space in the existing developed portions of the National Cemetery becomes limited, veterans would be forced to use private cemeteries for local burial services. If veterans in the Puget Sound area prefer to be buried in a National Cemetery, they would have to travel approximately 170 miles south of Seattle to the Willamette National Cemetery in Portland, Oregon. The Tahoma National Cemetery is currently the only national cemetery in Washington State. Not developing the next phase of burial areas is not preferable, as the cemetery would be unable to service to the estimated 390,000 veterans residing in the Puget Sound area

Under the No Action Alternative, there would be no impacts to the subject property related to the actions of the Department of Veterans Affairs, as it would likely remain in its present undeveloped condition.

3.3.3 Other Alternatives

Property outside the existing cemetery boundaries was not evaluated, as additional land acquisition is not necessary when the VA has sufficient capacity for burial services within the current cemetery property.

4.0 ENVIRONMENTAL IMPACT ANALYSIS

4.1 Procedures

As federal funding is required for cemetery operations, this Tiered EA was prepared in accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), and VA Regulations, Title 38 of the CFR, Section 26.4 (a). The VA policy includes provisions to act with care in carrying out its mission of providing services for veterans and to ensure it does so consistently with national environmental policies. Specifically, the VA shall ensure that all practical means and measures are used to:

- Protect, restore, and enhance the quality of the human environment;
- Avoid or minimize adverse environmental consequences, consistent with other national policy considerations;
- Prepare concise and clear environmental documents which shall be supported by documented environmental analyses; and
- Preserve historical, cultural, and natural aspects of our national heritage.

4.2 Prior Environmental Studies

The Final Environmental Impact Statement for a National Cemetery to Serve the Seattle-Tacoma Metropolitan Area, prepared by Bregman & Company, Inc. on behalf of the U.S. Department of Veterans Affairs, dated October, 1991 (VA 1991), was provided for this assessment. The report did not include a Conclusion and/or Summary Section and the Record of Decision (ROD) was not available.

4.3 Specific Areas Evaluated

The following sections contain discussions of each environmental area evaluated, including a summary of the conditions as described in the 1991 EIS, a description of existing conditions at the proposed Phase 2 development areas if they changed and/or if additional information is available since completion of the 1991 EIS, potential impacts associated with the proposed plans for the development areas, and CFM's strategy to mitigate impacts. The findings are based on a series of inquiries made to obtain background information on the site and describe the environmental consequences associated with the National Cemetery on the two alternatives defined in Section 3.3. The work was conducted in general accordance with the guidelines of the VA's Environmental Compliance Manual (VA 1998) and NEPA Interim Guidance for Projects (VA 2010). Included below are results from: records searches, which meet the government records

search requirements of ASTM Standard Practice for Environmental Site Assessments (E1527-05); owner/site manager interviews; site visits/investigations; and consultations with regulatory and resource agency personnel. Site photos taken in January and February 2010 are available as a separate section in this report (Photolog, Appendix A).

This Tiered EA examined the impacts of the proposed Phase 2 development at the Tahoma National Cemetery by the U.S. Department of Veterans Affairs on aesthetics, air quality, community services, cultural and historical resources, economic activity, floodplains and wetlands, geology and soils, noise, surrounding property use, real property, resident population, solid and hazardous waste, traffic and transportation, utilities, vegetation and wildlife, and water resources.

4.3.1 Aesthetics and Noise

Aesthetics refers to the visual resources, including natural and man-made features that give a particular piece of land its aesthetic properties. High sensitivity areas relate to rare or unique natural settings. Medium sensitivity areas relate to more developed areas with motor vehicles and modern civilization. Low sensitivity areas relate to areas with minimal landscape features and few changes in appearance. Noise refers to the generation of noise by construction or normal operations on the property.

Conditions presented in the Original EIS (1991) – Although the 1991 EIS does not contain a specific Section for Aesthetics under Environmental Setting, the Tahoma site is described as densely wooded, with an understory of ferns and shrubs. In addition, a review of the Washington State Natural Heritage Data System indicated that no rare plants, native plant communities, or special animal species were found at the site. The site was reportedly bordered to the north and east by single-family residential properties and undeveloped areas; and to the southwest by Tahoma Senior High School.

The 1991 EIS indicated that noise was not a problem at the Tahoma site. The site was described to be located “in a relatively remote location, far removed from aircraft flight patterns and not affected by highways, industrial establishments and other sources of noise.” However, based on the proximity of the adjacent high school, noise levels were taken at the site during the school’s lunch hour. Results indicated that noise levels were below the “acceptable 60 decibel level”.

Existing Setting – Approximately 60 acres of 159-acre cemetery site have been developed as burial areas and associated infrastructure (roads, administration/maintenance facilities, committal shelters, columbaria, etc.). The two Phase 2 development areas primarily consist of undeveloped woodlands, with the exception of a previously cleared, grassy field in the southeastern

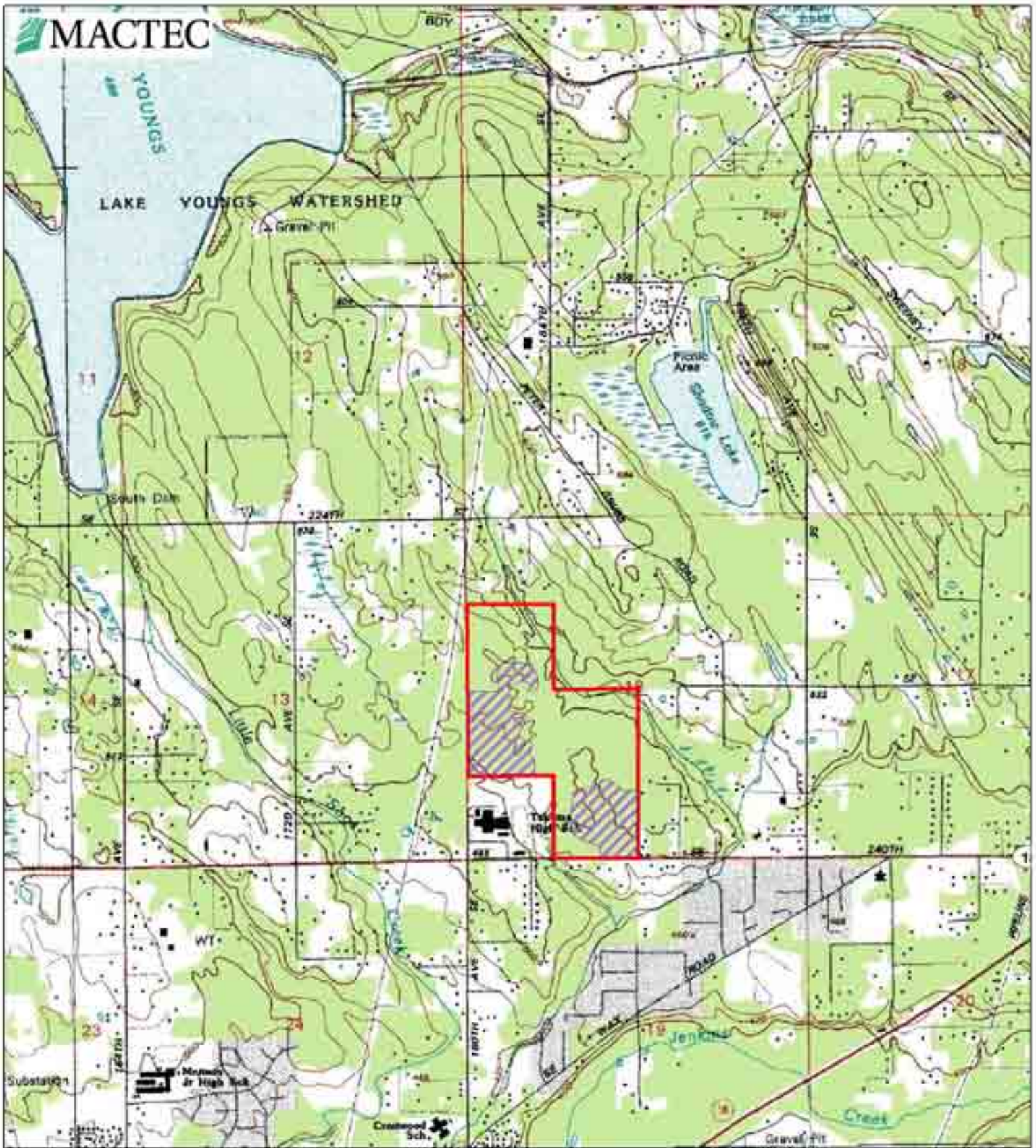
development area and a cleared area in the central-western development area currently used as a storage area for excess soils being generated at a Phase 1 burial area (Photolog, Appendix A). The areas surrounding the Tahoma National Cemetery remain similar to conditions described in the 1991 EIS and primarily consist of undeveloped woodlands and low-density residential properties, with Tahoma High School located immediately to the southwest of the cemetery.





The site is located in an area characterized by relatively level terrain, with slopes ranging from 6% to 15%. According to the United States Geological Survey (USGS) Topographic Map Maple Valley, Washington Quadrangle, the elevation of the site ranges between 475 and 525 feet above mean sea level (Figure 4-1). No streams were identified within the boundaries of the proposed development areas, although numerous forested and/or scrub-shrub wetlands are located in these areas.

The proposed development areas have no sources of significant noise generation. Noise conditions generally remain similar to conditions described in the 1991 EIS, with the exception of periodic ground maintenance activities, including the use of lawnmowers, leaf-blowers, etc. associated with cemetery maintenance and gun salutes associated with most interments. The short bursts of noise from the salutes only occur during weekday business hours. Vehicle traffic on SE 240th Street does not significantly influence noise at the proposed development areas and is minimized due to distance, existing vegetation, topography and limited traffic volume. During the site investigations for this evaluation, noise associated with construction activities at a Phase I burial area was noted. Noise associated with excavation equipment and trucks hauling spoil from the burial area to the dump site were audible in most areas of the cemetery during normal weekday business hours. However, construction noise associated with the development of burial areas is temporary and influences a limited area.

Potential Environmental Impacts and Proposed Mitigation Measures – In general accordance with the Master Plan (JGM, Landscape Architects 1995) for the entire 159-acre cemetery site, development of the Phase 2 burial areas is expected to occur within the next four years as the NCA projects gravesite depletion in currently developed areas of the cemetery by approximately 2016. Although detailed plans for the layout, design and specifications for the proposed expansion areas may not be finalized until the NEPA process has been completed, development of the two new burial areas are expected to provide approximately 21,000 gravesites for both casketed and cremated remains. In addition to the proposed burial areas, the project will also include associated



LEGEND

-  National Cemetery Property Boundary
-  Proposed Phase 2 Development Area



Created by: CGS
 Approved by: KMR
 March 10, 2010

Source: USGS (July, 1995)



**Figure 4-1:
 Topographic Contour Map**

Tahoma National Cemetery
 Proposed Phase 2
 Development Area
 Tahoma, WA

infrastructure (roadways, irrigation, etc.) and landscaping, as well as the addition of several memorial walls and a Scattering Garden/Ossuary.

The aesthetics of the existing cemetery and the surrounding property is not expected to be impacted by the development of the Phase 2 burial areas. The area is already characterized by the existing cemetery and adjacent wetland areas are expected to remain in their current condition. National Cemeteries are required to maintain a park-like setting and keep the grounds visually pleasing. NCA guidelines recommend that native vegetation be used in site landscaping, and valuable trees be preserved. Wetlands in the proposed development areas are generally unsuitable for cemetery development and will be avoided as much as possible. Minor and unavoidable impacts to wetlands are anticipated to occur in selected areas in order to allow safe access to and efficient development of the proposed new burial areas. Development plans will accommodate reasonable and appropriate vegetated buffers around most wetlands and property boundaries, as is consistent with current landscape practices at the existing developed portions of the cemetery.

Minimal long-term noise impacts to the surrounding area resulting from the continued development and operation of the Tahoma National Cemetery will occur. As the proposed Phase 2 burial areas are developed, there will be limited temporary impacts on noise levels in the adjacent neighborhoods from construction activities. Cemetery development typically involves clearing, grading and excavating several acres at a time in order to install pre-placed crypts and infrastructure, including irrigation systems and roads. Development activities associated with this phased approach using pre-placed crypts typically involve one or two excavators, one or two earth-movers and three to six dump-trucks to transport and dispose of excavated soils on site. Impacts should be minimized by limiting construction activity to daylight hours and by requiring properly muffled equipment.

Periodic ground maintenance activities, including the use of lawnmowers, leaf-blowers, etc. will occur on developed portions of the cemetery. Gun salutes associated with most interments will also continue to occur at developed portions of the cemetery. These short bursts of noise from the salutes will only occur during weekday business hours. These noises currently occur at the existing Tahoma National Cemetery and are audible from the proposed Phase 2 burial areas and surrounding area. Therefore, the proposed development activities are expected to result in minimal change in noise levels and minimal change to visual values to neighboring properties in the vicinity of the site.

Under the No Action Alternative, there would be no additional impacts on the noise levels or aesthetics of the area.

4.3.2 Air Quality

Air quality refers to the concentration of air contaminants in a specific location. Air quality is determined by the type and amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions. The Clean Air Act (CAA), as amended, requires the U.S. Environmental Protection Agency (EPA) to set National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. The CAA established two types of national air quality standards. Primary standards set limits to protect public health, including the health of “sensitive” populations, such as asthmatics, children and the elderly; and secondary standards set limits to protect public welfare, including protection against decreased visibility, and damage to animals, crops, vegetation or buildings. The criteria air pollutants monitored under the CAA include; carbon monoxide (CO), sulfur oxides, nitrogen dioxide, ozone, lead, and particulate matter (PM) 10 and PM 2.5 (EPA, 2005). Locations that meet the NAAQS are designated “attainment” areas and locations that fail to meet NAAQS are designated as “non-attainment” areas. “Maintenance areas” are those geographic areas that have had a history of nonattainment, but are now consistently meeting the NAAQS. Maintenance areas have been re-designated by the EPA from "nonattainment" to "attainment with a maintenance plan.”

Conditions presented in the Original EIS (1991) – The 1991 EIS includes a discussion of air quality standards and air quality monitoring data specific to the Puget Sound Air Quality Control Region (AQCR) and the four alternative cemetery sites, which all fell into this intrastate region. The Ambient Air Quality Standards Section summarizes the air quality standards issued nationally by the USEPA (NAAQS), as well as state and regional (AQCR) standards applicable in 1991, and the Air Quality Monitoring Data Section summarizes the pollutants of concern in the Puget Sound AQCR and at each of the four alternative sites. In the 1991 EIS, the Puget Sound AQCR included non-attainment areas for PM and CO; however, CO and PM monitoring in the vicinity of the Tahoma cemetery site were determined to be in compliance with regional standards. The 1991 EIS concluded that there were no air pollution problems at the Tahoma site.

Existing Conditions – Since the completion of the 1991 EIS, air quality conditions at the site have changed slightly and certain air quality standards (i.e. ozone and particulate matter) have been revised. According to the Washington Department of Ecology (WDE) and U.S. Environmental Protection Agency (EPA) Green Book websites, the existing cemetery and proposed development areas are located within a designated “maintenance area” for ozone. However, on January 7, 2010, the USEPA proposed a change in the federal 8-hour ozone standard. The current standard is 0.075 parts per million (ppm) and the proposed standard will be set within the range of 0.060 to 0.070 ppm. According to the WDE website, the EPA committed to making a decision on the ozone

standard by July 29, 2011. King County exceeded federal PM 2.5 standard in 2006, but PM 2.5 levels were below the federal standard in 2007 and 2008. The site is located in an area of “attainment” for the remaining NAAQS pollutants. No unusual odors were detected at the site during the site visits in January and February 2010.

Potential Environmental Impacts and Proposed Mitigation Measures – Cemetery development typically involves clearing, grading and excavating several acres at a time in order to install pre-placed crypts and infrastructure, including irrigation systems and roads. During the phased development of the Phase 2 burial areas, emissions from internal combustion engines and generation of dust from the five to ten vehicles involved with earth-moving activities could temporarily increase levels of some pollutants. There will also be emissions from fugitive dust associated with vehicles using small sections of unpaved roads, windblown dust from areas not covered by vegetation, material handling, etc. The phased development approach and implementation of best management practices (BMPs) to control erosion and dust should minimize releases of fugitive emissions to the atmosphere. A dust mitigation program to ensure that these emissions are kept at a minimum should be implemented and engines should be properly maintained. Intermittent, short-term increases of some pollutants may also be associated with burial practices over time due to the use of small scale excavation equipment. It is expected that the VA and their contractors will maintain their fleet of vehicles so emissions are kept to a minimum. Thus, impacts to air quality are expected to be short-term and minor.

Under the No Action Alternative, there would be no additional impacts to air quality in the area.

4.3.3 Community Services

Community services refer to services provided by surrounding communities such as police, fire and ambulance services.

Conditions presented in the Original EIS (1991) – The 1991 EIS includes a very brief and general discussion of community services at the four alternative cemetery sites. Community services at the Tahoma cemetery site have changed in the last 20 years, primarily as a result of increased development in the vicinity of cemetery.

Existing Conditions – The site is located in unincorporated King County and receives services from both the City of Kent and King County. The City of Kent is governed by the mayor and seven City Council members and King County is governed by the Office of the County Executive and nine County Council members. Emergency services are provided to the site by the Kent Fire Department, which consists of eight fire stations and 29 firefighters. Fire station #78 serves the

Tahoma National Cemetery and is located approximately 1.5 miles from the site (City of Kent and Google Earth, 2009). Law enforcement services are available through the King County Sheriff's Office, which serves unincorporated King County, 12 cities, King County International Airport, Metro Transit, and the Muckleshoot Indian Tribe. The King County Sheriff's Office serves over 1.8 million people and has over 1,000 employees. Unincorporated King County is divided into five precincts. The cemetery is located within Precinct 3, which covers approximately 700 square miles. The closest hospital to the site is Auburn Regional Medical Center, located approximately eight miles from the site (Google Earth, 2011). Community services are not regularly used at the existing cemetery or proposed development areas.

Potential Environmental Impacts and Proposed Mitigation Measures – Under the proposed action fire, police and medical services would not be affected since the number of employees and visitors associated with the continuing operation of the cemetery would be insignificant compared to the overall existing population served.

Under the No Action Alternative, there would be no additional impacts on community services in the area.

4.3.4 Cultural and Historical Resources

Under NEPA, compliance with Section 106 of the National Historic Preservation Act (NHPA), as amended, which addresses the protection of archeological, historic and cultural resources, is required.

Conditions presented in the Original EIS (1991) – During the completion of the 1991 EIS, a review of the National Register of Historic Places (NRHP) did not identify any properties listed or eligible for listing in the NRHP or the Washington State Register of Historic Places at the Tahoma Site. Additionally, based on consultation with the Washington State Historical Preservation Officer (SHPO), the Historic Preservation Officer for King County and local personnel, as well as a visual inspection of accessible parts of the site, it was determined that there were no standing historic structures at the site which could be determined eligible for the National Register. The SHPO also provided a letter indicating that little to no archaeological studies had been conducted at the proposed Tahoma Site and recommended that an archaeological survey be completed at the alternative site selected as the location for the National Cemetery. No additional documentation pertaining to Cultural and Historical Resources was provided for this assessment.

Existing Conditions – A cultural resources literature records review and archaeological survey of the proposed Phase 2 development areas was conducted in January and February 2010 by AMEC Earth and Environmental, Inc (AMEC) of Bothell, Washington. The literature and records review, as well as the pedestrian survey and shovel tests, were completed under the direction of a Registered Professional Archaeologist (RPA). The purpose of the study was to identify the presence of recorded archeological sites and historic properties within and adjacent to the site. The study involved a literature and records search and an intensive pedestrian survey. The Area of Potential Effect (APE) for the cultural resources assessment incorporates the 52-acre study area. The literature and records search included a historic map review and a record search on the Washington State Department of Archaeology and Historic Preservation's (DAHP) Washington Information System for Architectural and Archaeological Records Data (WISAARD) website. The pedestrian survey, conducted in transects spaced 20 meters apart, effectively located areas within the APE where subsurface testing was possible. Shovel test probes were placed at 20-meter intervals along their respective transects and measured 30 centimeters in diameter, up to 50 centimeters deep. One hundred sixty-one shovel test probes were excavated during the subsurface testing of the APE.

Following completion of the cultural resources literature records review and archaeological survey, AMEC completed a Cultural Resources Assessment report (AMEC, March 9, 2010). The report concluded that no archaeological materials were found during the pedestrian survey and/or subsurface exploration of the project APE; no historic buildings and/or structures were located within or adjacent to the APE; and to date, no Traditional Cultural Properties were identified within or adjacent to the APE. The current investigations confirm the conclusions of the 1991 EIS that no sites listed or eligible for listing on the NRHP are located at the Tahoma National Cemetery or surrounding properties, with the exception of the Tahoma National Cemetery itself, which is eligible for listing on the NRHP.

In addition to the cultural resources investigation conducted by AMEC, the CFM has initiated consultation with the Washington DAHP and several Native American tribes with historical connections to the region that includes the Tahoma National Cemetery. Correspondence between these parties is ongoing and will continue until the completion of the project. Mr. Brandon Reynon, Tribal Archaeologist/Cultural Regulatory Specialist with the Puyallup Tribe of Indians replied that they are unaware of historic sites in this specific area, but request immediate notification if historic sites are uncovered during the Phase 2 development (Appendix B). To date, the Colville Confederated Tribes, Muckleshoot Tribe and Yakama Nation have not responded to the request for consultation.

Potential Environmental Impacts and Proposed Mitigation Measures – The conclusions of the Cultural Resources Assessment (dated March 9, 2010) completed by AMEC Earth & Environmental, Inc. resulted in a finding of “No Historic Properties Subject to Effect within the APE”. The Cultural Resources Assessment was submitted to the Washington DAHP and in a response dated April 14, 2010 (Appendix B) the DAHP replied that they “concur with the determination of No Historic Properties Affected”. In the unlikely event that undocumented cultural resources are encountered during ground-disturbing activities at the site, all work in the immediate area of the discovery should cease and a qualified archaeologist should be notified. The work should not resume until the resource has been documented and evaluated for eligibility for the NRHP, in compliance with Section 106 of the NHPA. Based on the results of the Cultural Resources investigations, no impacts to cultural resources on the site are expected to occur as a result of the proposed Phase 2 development. The design of the new burial areas will remain consistent with the aesthetics and features of the existing cemetery and will not limit the eligibility of the Tahoma National Cemetery for listing on the NRHP.

Selection of the No Action Alternative would not impact cultural resources in the area.

4.3.5 Economic Activity

Economic Activity refers to the effect that the proposed action would have on the economic conditions in the surrounding area.

Conditions presented in the Original EIS (1991) – The 1991 EIS includes discussions under the headings of Employment, Income, and Population and Housing that would fall under the general category of Economic Activity. Evaluations of these areas in the 1991 EIS were generally conducted at a macro level, focusing on the “Puget Sound area” consisting of the following four counties; King, Kitsap, Pierce and Snohomish. These sections of the 1991 EIS provided historical, current and forecast information on commercial and economic activity in the area, including employment trends, major industries for employment, income, population and housing. According to the 1991 EIS, the majority of those employed, “about 60%”, in the area of the proposed Tahoma site worked in service industries and retail trade, and per capita income for the entire Puget Sound area exceeded the national average. The 1989 population for King County was reported as 1,446,000 and accounted for 55.2% of the four county area’s total population. In the 1991 EIS, population was projected to reach 1,697,500 by 2000 and 2,114,700 by 2020.

Existing Conditions – Economic activity in the area surrounding the site has changed somewhat from the conditions described in the 1991 EIS. According to the U.S Census Bureau, the population of King County was estimated at 1,916,441 in 2009. The City of Kent is the sixth

largest city in Washington State with a population of nearly 115,000 (City of Kent, 2011). According to the King County Annual Growth Report (2009), the top five employers in the county are: the Boeing Company, the University of Washington, King County Government, Providence Health System, and Alaska Air Group, Inc. The majority of jobs in the county are in the finance, insurance and real estate sectors, followed by information/technology, government/education, health care, manufacturing, retail, wholesale, transportation, utilities and construction (King County 2009). The government-owned cemetery property currently has minimal economic effect on the community.

Potential Environmental Impacts and Proposed Mitigation Measures – Under the Proposed Alternative, there will be temporary jobs created at the cemetery for construction workers during the proposed Phase 2 development activities. Maintenance activities associated with increased burial areas may require additional employees. However, this number would be minimal and would not be expected to impact the economic activity in the area.

Under the No Action Alternative the existing National Cemetery would likely close to first interments by 2016. While the cemetery would not close, it is likely that there would be a reduction in staff, resulting in a minimal, adverse impact on economic activity in the area.

4.3.6 Floodplains and Wetlands

Executive Order 11988 and the floodplain management criteria contained in 44 CFR Part 60, Criteria for Land Management and Use, requires that long-term and short-term adverse impacts associated with occupancy and modification of floodplains be avoided to the extent possible. Floodplains are those areas that have been delineated by the Federal Emergency Management Agency (FEMA) and identified on the Flood Insurance Rate Maps (FIRM), as occurring in either the 100-year and/or 500-year floodplain.

Jurisdictional waters of the United States, including streams and wetlands, are defined by 33 CFR Part 328.3 and are protected by Section 404 of the Clean Water Act (CWA; 33 USC 1344), which is administered and enforced by the U.S. Army Corps of Engineers (USACE). The 1987 USACE Wetlands Delineation Manual defines wetlands as “*areas inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions*”. This definition supports the three criteria that must be met for a determination of jurisdictional wetlands according to the USACE: (1) wetland hydrology (subject to inundation or saturation near the surface for a period during the growing season), (2) hydrophytic vegetation (vegetation adapted for life in saturated soil conditions), and (3) hydric soils (soils with

characteristics that developed due to saturated conditions). All three criteria must be present for an area to be classified as a jurisdictional wetland. Wetlands include permanently inundated marshes and water-lily beds, seasonally flooded swamps, temporarily inundated floodplains, saturated bogs (e.g., sphagnum moss bogs), seasonally saturated woodlands, seasonal seeps, and tidally influenced coastal marshlands (Tiner 1998).

The Washington Department of Ecology (WDE) regulates most wetlands in Washington State, regardless of jurisdictional status with the USACE. Furthermore, King County asserts jurisdiction over sensitive areas within the county. Sensitive areas include those areas that are subject to natural hazards or that support unique, fragile or vulnerable natural resources. Wetlands provide many vital ecosystem functions such as sediment and pollution filtering, groundwater recharge, flood protection and storage, wildlife habitat and aesthetic open space. Based on these critical functions, wetlands and streams in King County are considered sensitive areas. In environmentally sensitive areas, vegetative buffers are critical to maintaining natural water temperature, water quality and wildlife habitat. Trees, shrubs and other vegetation keep water cool and filter potentially harmful pollutants before they enter the aquatic system, which is vital to preserving the health of fish, animals and people that depend on these waters (King County DDES, 2004).

King County (Zoning Code 21A.24.318) classifies wetlands using the 2004 Wetland Rating System for Western Washington. In this system, wetlands are classified into four categories (1-4) according to a scoring system based on water quality, hydrology, habitat, wetland rarity and sensitivity to disturbance, with the wetlands rated as Category 1 considered the most critical for conservation (King County DDES, 2004). Category 1 wetlands include Natural Heritage Wetlands, bogs, estuarine wetlands, coastal lagoons and natural wetland areas that have a habitat score between 20 and 36 points. Category 2 wetlands include some estuarine wetlands and some natural wetland areas that also have a habitat score between 20 and 36 points. Category 3 wetlands include natural wetland areas that have a habitat score between 20 and 28 points. Category 4 wetlands include other wetland areas that do not have a habitat score of above 20 points. King County requires that wetland mitigation be provided for impacts to jurisdictional wetlands and prefers that any mitigation be “on-site and in-kind”. However, off-site mitigation may still apply if the mitigation site is located in the same watershed as the impacts. Vegetative buffers around wetlands protect the wetland and provide multiple ecological functions. King County places limitations on new or expanded activities allowed within wetland buffers (Zoning Code 21A.24.325). The standard buffer width around Category 1 wetlands is 125 feet, Category 2 wetlands is 100 feet, Category 3 wetlands is 75 feet, and Category 4 wetlands is 50 feet. Although standard wetland buffers are stipulated by King County based on the wetland ratings, buffer widths

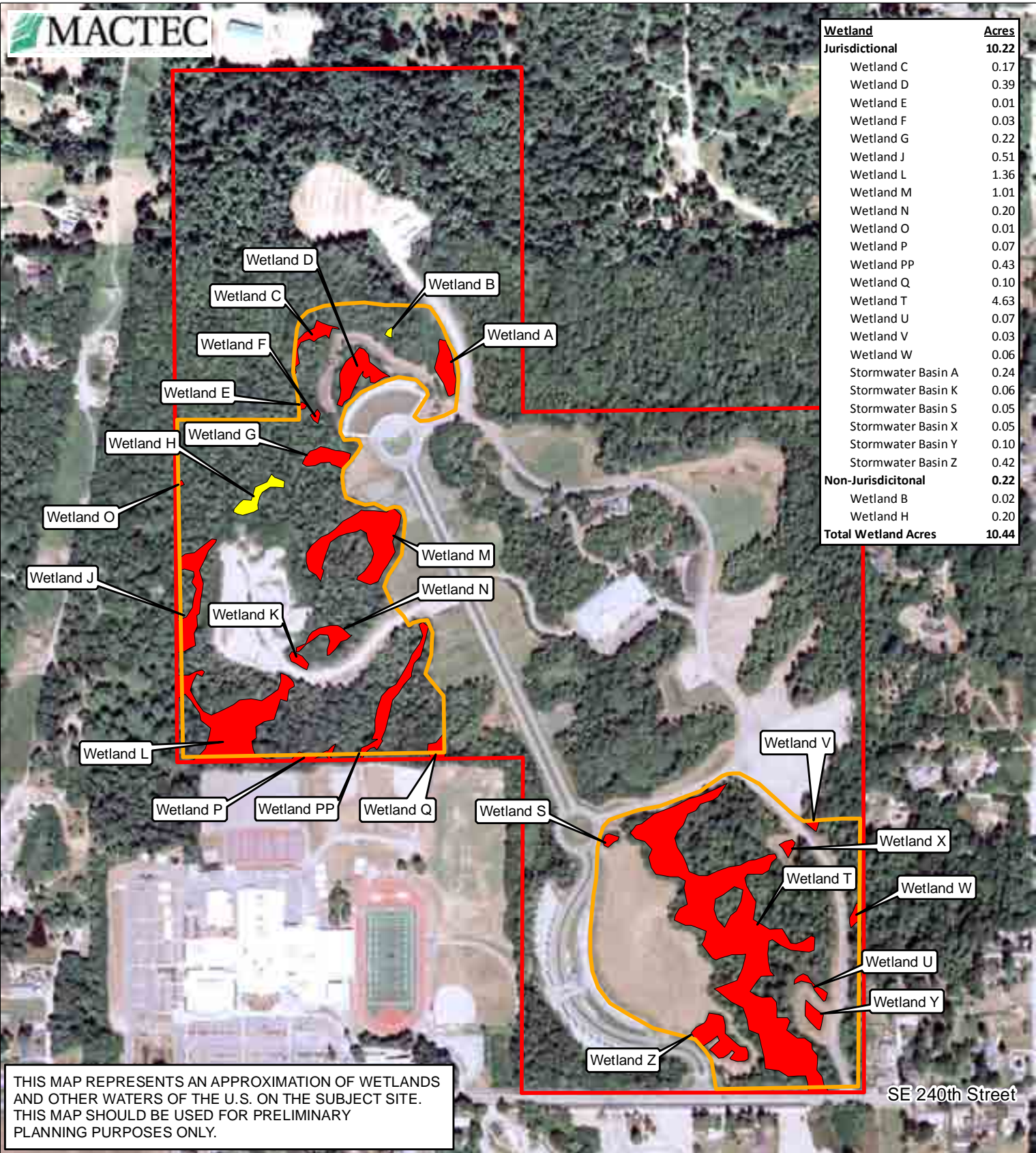
may be increased or decreased under some circumstances. Standard buffer widths may be adjusted depending on the type of proposed development activity and location in either an urban or rural setting (King County DDES, 2004).

Conditions presented in the Original EIS (1991) – A brief discussion of wetlands is included in the 1991 EIS. The original study identified three wetlands at the Tahoma site based on the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI). The three wetlands are identified as one large wetland located in the northeast portion of the site and two other wetlands located in the west central and east central portions of the site. Additionally, NWI maps indicated that two wetlands were located outside the project boundary to the northeast of the site.

In 1994, prior to development of the Tahoma National Cemetery, L.C. Lee and Associates, Inc. conducted a jurisdictional waters of the U.S./wetlands delineation of the proposed cemetery site. In their 1994 report entitled “*An Analysis of the Distribution and Jurisdictional Status of Waters of the United States, Including Wetlands, at the Proposed Department of Veterans Affairs National Cemetery, King County, Washington*”, L.C. Lee and Associates, Inc. classified the wetlands delineated on-site as Class 2 wetlands. At that time, King County Zoning Codes only identified three wetlands classes as opposed to the current four.

Existing Conditions – According to the FEMA Map Service Center website (FEMA/FIRM Community-Panel Number 53033C1015F, revised May 16, 1995) and the King County Water and Land Resources Cartographic Hydrography Coverage, dated December 1998, the site is not located within either the 100-year or 500-year floodplains.

Data from the National Wetlands Inventory (NWI; USFWS, 2007), aerial photographs, soil surveys and USGS topographic maps were reviewed prior to the site visit to determine locations and types of wetlands that may be present on the site. During a site visit by MACTEC wetlands scientists in February 2010, a delineation of federal jurisdictional waters of the U.S., including wetlands as defined in 33 CFR Part 328, was completed. Twenty-five forested and/or scrub-shrub wetlands (approximately 10.44 acres out of 52 total acres) have been delineated within the boundaries of the proposed Phase 2 development areas at the cemetery (Figure 4-2). These wetlands generally exit the cemetery site to the south-southeast towards an unnamed tributary of Jenkins Creek. Jenkins Creek flows into Little Soos Creek, which eventually empties into the Green River, considered a traditionally navigable water of the U.S. Of the 25 wetlands located in the proposed Phase 2 development areas, six of them appear to be man-made stormwater management areas. Although these stormwater management areas appear to have been excavated out of entirely upland areas, they meet all three wetland criteria (vegetation, hydric soils and



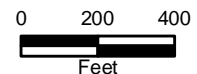
Wetland	Acres
Jurisdictional	10.22
Wetland C	0.17
Wetland D	0.39
Wetland E	0.01
Wetland F	0.03
Wetland G	0.22
Wetland J	0.51
Wetland L	1.36
Wetland M	1.01
Wetland N	0.20
Wetland O	0.01
Wetland P	0.07
Wetland PP	0.43
Wetland Q	0.10
Wetland T	4.63
Wetland U	0.07
Wetland V	0.03
Wetland W	0.06
Stormwater Basin A	0.24
Stormwater Basin K	0.06
Stormwater Basin S	0.05
Stormwater Basin X	0.05
Stormwater Basin Y	0.10
Stormwater Basin Z	0.42
Non-Jurisdictional	0.22
Wetland B	0.02
Wetland H	0.20
Total Wetland Acres	10.44

THIS MAP REPRESENTS AN APPROXIMATION OF WETLANDS AND OTHER WATERS OF THE U.S. ON THE SUBJECT SITE. THIS MAP SHOULD BE USED FOR PRELIMINARY PLANNING PURPOSES ONLY.

SE 240th Street

LEGEND

- National Cemetery Property Boundary
- Proposed Phase 2 Development Area
- Wetland Status**
- Jurisdictional
- Non-Jurisdictional



Created by: CGS
 Approved by: WLM
 May 25, 2011



**Figure 4-2:
 Wetland Jurisdictional
 Status Map**

Tahoma National Cemetery
 Proposed Phase 2
 Development Area
 Tahoma, WA

hydrology) and are hydrologically connected to downstream wetlands via culverts (some of these being man-made features), thus making them jurisdictional. Wetlands B and H have been determined to be isolated and non-jurisdictional. All of the other wetlands on site have been determined to be jurisdictional Waters of the U.S., as verified in a letter from the Seattle District of the U.S. Army Corps of Engineers dated March 11, 2011 (Appendix B). The on-site wetlands and stormwater management areas are discussed in further detail below:

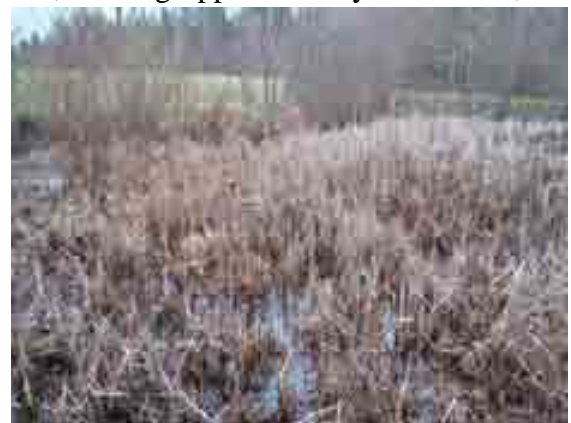
Wetlands

- The nineteen forested and/or scrub-shrub wetlands, totaling approximately 9.50 acres, are located across both of the Phase 2 development areas. Vegetation associated with wetlands identified on the site generally consists of red alder (*Alnus rubra*), black cottonwood (*Populus balsamifera*), Oregon ash (*Fraxinus latifolia*), western red cedar (*Thuja plicata*), huckleberry (*Vaccinium sp.*), vine maple (*Acer circinatum*), salmonberry (*Rubus spectabilis*), salal (*Gaultheria shallon*), sword fern (*Polystichum minutum*), woolgrass (*Scirpus cyperinus*), slough sedge (*Carex obnupta*), whitebark raspberry (*Rubus leucodermis*) and watercress (*Nasturtium officinale*). Saturated soils, drainage patterns, water-stained leaves, iron-oxidizing bacteria, aquatic invertebrates, amphibians and water marks on vegetation were typically observed within wetland areas.



Stormwater Management Areas

- The six man-made stormwater management areas, totaling approximately 0.92 acres, are also divided between both Phase 2 development areas. Wetland areas A and K (approximately 0.30 acres combined) are located in the northwestern development area and Wetland areas S, X, Y and Z (approximately 0.62 acres cumulative) are located in the southeastern development area. Vegetation in the man-made stormwater management areas generally consists of red alder, cattail (*Typha latifolia*), reed canarygrass (*Phalaris arundinacea*) and soft rush (*Juncus effusus*). Although these wetlands lack the diversity found in the natural wetlands observed on the site and appear to have been excavated, the USACE has confirmed that all six of these areas are jurisdictional waters of the U.S./wetlands.



Potential Environmental Impacts and Proposed Mitigation Measures – No portion of the existing cemetery site (including the proposed Phase 2 development areas) is mapped within the 100-year or 500-year floodplains. The proposed development areas contain jurisdictional wetlands associated with the on-site drainages and man-made stormwater management areas. The USACE approved a Preliminary Jurisdictional Determination, which identified the extent of jurisdictional and non-jurisdictional wetland areas at the Tahoma National Cemetery. The total acreage of jurisdictional wetlands is 10.22 acres, with 0.22-acres of non-jurisdictional wetlands, as verified by the USACE.

Landscaping and development practices at the existing Tahoma National Cemetery generally avoid wetlands and leave undisturbed vegetative buffers around these areas. Development of the Phase 2 expansion areas is estimated to impact approximately 0.35 acres of wetlands based on preliminary development plans. Previous development at the cemetery associated with the initial Phase I construction involved an estimated 0.28 acres of wetland impacts. The current impacts will be addressed by submittal of a Nationwide Permit or Individual Section 404 permit application to the Seattle District (application submitted August 2011), with proper coordination and approval by WDE and King County. The VA has been engaged with the USACE throughout the design process and during the creation of site development plans and mitigation plan. Any adverse impacts to jurisdictional wetlands will be compensated using on-site and in-kind mitigation. The current and cumulative wetlands impacts associated with the proposed Phase 2 development for the continued cemetery operations remain minimal.

Under the No Action Alternative, there would be no impacts to floodplains or wetlands identified in the Phase 2 development areas.

4.3.7 Geology and Soils

Geology and soils refers to the potential for loss of soils and changes in geological conditions due to rock excavation, soil erosion, soil compaction, soil horizon removal, grading, and cutting and filling operations.

Conditions presented in the Original EIS (1991) – The 1991 EIS includes brief discussions of Geomorphology, Soils and Seismicity pertaining to the region and/or four alternative cemetery sites originally retained for detailed analysis. The Geomorphology Section summarizes the broad geologic conditions and history associated with the three mountain ranges that dominate that Pacific Northwest, while the Seismicity Section provides the Seismic risk associated with the four alternative sites. A description of the soil types found at each alternative site is also provided. The information discussed in these three sections of the 1991 EIS has not changed in the past 20 years,

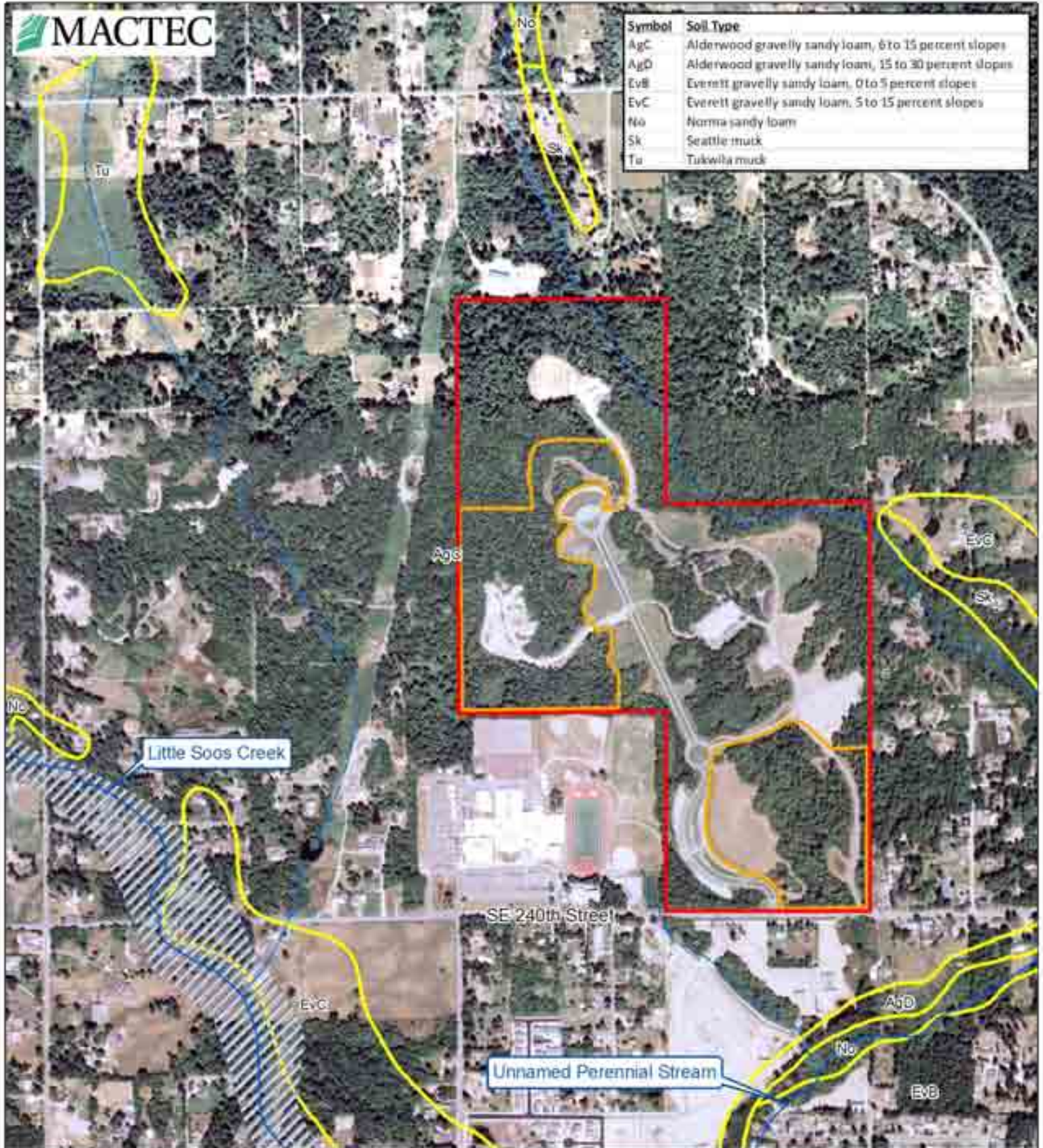
with the exception of some updated details pertaining to the soils at the Tahoma site. However, a more detailed discussion of these criteria, specific to the Tahoma National Cemetery site and the proposed Phase 2 development areas, is provided below.

Existing Conditions – The proposed site primarily consists of relatively level terrain, with a slight topographic ridge in the central portion of the existing cemetery, trending from the northwest to the southeast. Drainage at the existing cemetery site generally flows to the south-southeast, towards an unnamed tributary of Jenkins Creek located south of SE 240th Street. According to the United States Geological Survey (USGS) Maple Valley Quadrangle 7.5 minute series map (revised 1995) the elevation of the site ranges from approximately 475 to 525 feet above mean sea level (Figure 4-1).

The site lies within the Puget Lowlands physiographic province, which is a broad, low-lying region situated between the Cascade Range to the east and the Olympic Mountains and Willapa Hills to the west. More specifically, the cemetery is situated within the Big Soos Creek Basin, which was created through extensive landscape modification by repeated glacial scouring and deposition. The basin occupies part of the distinctive physiographic region known as the Covington Drift Plain of the Puget Lowlands (Tanaka, 1990). The Covington Drift Plain is bound by the Green River to the west and south, and the Cedar River to the north. The Green River flows into the Duwamish Valley, which has been incised 240 to 400 feet below the drift plains on either side. In the Soos Creek Basin, till mantles nearly the entire ground surface and forms a strongly lineated, elongated topography with hills and swales oriented in the direction of the ice flow (north-northwest to south-southeast). According to the Geologic Map of Washington State, the area is characterized by Pleistocene-age continental glacial drift, which in this case consists of unconsolidated gravel and sand (Washington State Department of Natural Resources, 2010).

According to the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey, the soils beneath the cemetery site and proposed Phase 2 development areas are mapped as Alderwood gravelly sandy loam, ranging from 6 to 15 percent slopes (Figure 4-3). These loam soils are moderately deep to a cemented hardpan and are moderately well-drained with a low shrink-swell potential. The permeability of these soils typically range between 2.0 and 6.3 inches per hour and the depth to seasonal high water table is reportedly 18 to 36 inches below ground surface. Typically, the surface layer is a very dark grayish brown, gravelly ashy sandy loam about seven inches thick and the subsoil is dark yellowish brown to brown, very gravelly ashy sandy loam about 23 inches thick. A dense, extremely hard and firm, grayish brown glacial till that breaks to very gravelly sandy loam is typically present between 43 and 60 inches below ground surface. Depth to hardpan ranges from 43 to 60 inches (USDA, 2007).

Symbol	Soil Type
AgC	Alderwood gravelly sandy loam, 6 to 15 percent slopes
AgD	Alderwood gravelly sandy loam, 15 to 30 percent slopes
EvB	Everett gravelly sandy loam, 0 to 5 percent slopes
EvC	Everett gravelly sandy loam, 5 to 15 percent slopes
No	Norma sandy loam
Sk	Seattle siltuck
Tu	Tukwila muck



LEGEND

- National Cemetery Property Boundary
- Proposed Phase 2 Development Area
- Soil Map Unit (NRCS, 1973, 2000)
- 100 Year Floodplain (FEMA, 1995)
- Unnamed Intermittent Stream (USGS, 1995)
- Perennial Stream (USGS, 1995)

Source: Aerial- USGS (July 2006)



Created by: CGS
 Approved by: KMR
 March 10, 2010



**Figure 4-3:
 NRCS Soil and
 FEMA Floodplain Map**

Tahoma National Cemetery
 Proposed Phase 2
 Development Area
 Tahoma, WA

More than 1,000 earthquakes are recorded by seismographs in the Puget Lowland each year. Of annually recorded earthquakes, ten or more are of an amplitude and depth capable of producing tremors felt by the public. The epicenters for the last two major earthquakes were under Olympia (1949) and Seattle-Tacoma (1965) with Richter magnitudes 7.1 and 6.5, respectively. According to the Washington State Department of Natural Resources (DNR), on a scale of 0 to 4, with 4 being the highest risk, the Puget Lowland is classed as a Seismic Risk Zone 3 (DNR, 2010).

Potential Environmental Impacts and Proposed Mitigation Measures – Minimal impacts to the geology of the site are expected to occur as a result of excavations for burial vaults into the shallow sub-soils. No large-scale excavations into the deeper strata are expected. According to cemetery staff, there are no issues with shallow bedrock or slope stability at the previously developed portions of the Tahoma National Cemetery (Pers. Comm. Tom Yokes, NCA, 2010).

Minor, long-term impacts to the surficial soils will occur as a result of the Phase 2 development. Soil impacts are discussed in terms of direct impacts to area soils and the ability of a soil to support planned uses. Substantial excavation and grading is common in national cemetery development practices. Generally, multiple rows of crypts/vaults are installed at the same time in a large excavated area. VA reuses the excavated soil on-site as much as possible during construction; however, it is estimated that approximately 45,000 cubic yards of unsuitable soil will be excavated and removed from the site. Additionally, it is expected that approximately 10,000 cubic yards of soil will need to be imported to complete the proposed development.



The majority of excavated topsoils are reused as they are most useful in landscaping applications. King County ordinances require a grading permit for local development projects that exceed 100 cubic yards of fill or the creation of 2,000 square feet of new impervious surface. If greater than 500 cubic yards is to be disturbed, additional environmental documentation is typically required as part of the permitting process. Phased development at the cemetery will generally adhere to municipal ordinances, which will limit environmental impacts. Alderwood gravelly sandy loam at slopes of 6 to 15 percent has a moderate water erosion hazard. The site development and burial activities would temporarily disturb these soils, and soils that are exposed and allowed to dry could become eroded by either wind and/or water. Wind erosion could suspend dust particles, adversely affecting air quality (refer to Section 4.3.2 for a discussion of air quality impacts), and water erosion could carry sediments into drainages which could adversely affect water quality (refer to section 4.3.14 for a discussion on water resource impacts).

According to the NRCS, the federal Farmland Protection Policy Act (FPPA) was created to protect farmland and address urban sprawl (USDA NRCS, 1994). Consequently, soils specifically suited to agricultural uses may be identified under the FPPA. Conversion of these soils from agricultural to nonagricultural uses should be addressed for a Federal action. Specifically protected are cultivated areas identified by the FPPA as prime farmland, unique farmland, and farmland that is of local or statewide importance. The FPPA typically regulates areas that have been cultivated within the last five years. King County's GIS system indicates that the proposed site is classified as a 'Rural Area' with no current farmland preservation classifications. The site is mapped as Alderwood gravelly sandy loam, which the USDA-NRCS has indicated to be "farmland of statewide importance". However, since the proposed site is located within the boundaries of the existing cemetery, the USDA-NRCS considers the mapped soils as "land already in or committed to urban development" that does not, therefore, meet the definition of important farmland (NRCS Letter, Appendix D).

To mitigate the potential impacts caused by erosion, and related impacts to water and air resources, appropriate construction BMP's would be implemented as required by the Environmental Protection Agency, the Washington State DNR, King County, VA-NCA Standards and other applicable rules and regulations. Erosion control methods must account for factors that influence the degree of erosion and chosen method, such as rainy periods and slope. Such practices could potentially include:

- Silt fences
- Re-vegetation of bare soils
- Mulching of bare soils
- Wet suppression of soils to reduce wind erosion
- Covering of soil stockpile
- Preserving existing site vegetation
- Construction monitoring and reporting

Once constructed, the cemetery will undergo routine excavation in order to access individual burial vaults for interment, which would cause limited disturbance to soils. Excavated sod and soils would be covered to prevent wind and water erosion, as necessary (in most cases, excavations are only open for one to two days), and would be returned following interment.

Under the No Action Alternative, there would be no impacts on the geology and only minor impacts to existing soils in the proposed Phase 2 development areas.

4.3.8 Land Use and Real Property

Land Use represents the current and planned use of the property in a jurisdiction by the governing authorities. Real Property refers to the reduction of land on the tax rolls or reduction in land value.

Conditions presented in the Original EIS (1991) – The 1991 EIS provides a discussion of land use at the proposed Tahoma cemetery site and indicates that the Tahoma site falls under the Soos Creek Plateau Communities Plan for unincorporated areas of King County. Although the plan emphasized the importance of maintaining the rural character of the area, none of the Plan’s specific recommendations related to the Tahoma site. The proposed Tahoma site was zoned “RURAL AR-5 (extended agricultural use)” and was owned by Washington State, under the management of the Washington Department of Natural Resources. The 1991 EIS indicated that the “general design, construction and operation and maintenance requirements for a national cemetery are consistent with the purposes of the AR-5 zoning requirements”. No discussion of Real Property, as it is defined above, was included in the 1991 EIS.

Existing Conditions – The existing Tahoma National Cemetery remains located within the unincorporated limits of King County and zoned RA-5 (Rural Area, one dwelling unit per 5 acres). The proposed Phase 2 development areas primarily consist of undeveloped woodlands, with the exception of a previously-cleared, grassy field and an area used for soil storage, within the existing cemetery boundaries. The areas surrounding the Tahoma National Cemetery primarily consist of undeveloped woodlands and low-density residential properties, with Tahoma High School located immediately to the southwest of the cemetery.

The King County Zoning Atlas dated February 21, 2006, obtained from the King County Department of Development and Environmental Services depicts the existing cemetery as a compilation of four original parcels. The property was transferred from the State of Washington to the U.S. Department of Veterans Affairs for \$1,618,000 on November 11, 1993.

Potential Environmental Impacts and Proposed Mitigation Measures – No transfer of ownership is required for the development of the proposed Phase 2 burial areas. The proposed action is contained within the boundaries of the existing National Cemetery, owned by the United States Government, and would have no impact on land use, property values or tax revenues. The proposed development plans are consistent with the current uses of the cemetery.

Under the No Action Alternative, there would be no impacts to land use or real property.

4.3.9 Resident Population

Resident Population refers to the addition of cemetery staff, change in the neighborhood makeup, or alteration of demographic characteristics.

Conditions presented in the Original EIS (1991) – The 1991 EIS does not include a discussion of Resident Population, as it is defined above. However, in the discussion of potential environmental impacts, it was determined that the “number of permanent employees associated with the cemetery is so slight that there will be no significant increase in population or housing requirements”.

Existing Conditions – The proposed Phase 2 development areas are within the boundaries of the existing cemetery and there are no residences and/or occupants in these areas.

Potential Environmental Impacts and Proposed Mitigation Measures – Under the Proposed Alternative, no impacts to residential population are expected. Short-term, temporary jobs may be created during the construction phases of the proposed burial areas, but there will only be limited opportunities for permanent employees, as the general maintenance and operations of these areas likely will be conducted by existing cemetery staff.

Under the No Action Alternative, there would be no impacts on the resident population in the area.

4.3.10 Solid and Hazardous Waste

The Solid and Hazardous Waste category refers to changes in the proper management of solid waste and hazardous waste in compliance with local, state, and Federal regulations.

Conditions presented in the Original EIS (1991) – The 1991 EIS included an on-site inspection and research review to identify possible hazards and nuisances associated with the four proposed cemetery sites. No hazardous waste sites, hazards or other nuisances were identified at the proposed Tahoma cemetery site.

Existing Conditions – No generation of solid or hazardous waste is currently occurring at the proposed Phase 2 development areas. No evidence of solid waste containers, solid waste dumping, hazardous chemicals or drums was observed in these areas during the site reconnaissance in January 2010. However, operations at the previously-developed portions of the cemetery include the generation of solid waste and the maintenance facility for the cemetery includes solid waste containers, above-ground storage tanks (ASTs) for fuel storage and temporary, seasonal storage of pesticides and fertilizers. The Cemetery maintenance facility is located at least 700 feet from either of the proposed burial areas.

MACTEC contracted Environmental Data Resources, Inc. (EDR) to perform a database search of information published by the state and federal regulatory agencies for the site and adjacent and surrounding properties. It should be noted that regulatory listings are limited and include only those sites that are known to the regulatory agencies at the time of publication to be contaminated, regulated, or in the process of evaluation for potential contamination; and within the specified search radius.

A review of the database search (Table 4-1) indicated that the existing Tahoma National Cemetery, located at 18600 SE 240th Street, was identified on the SPILLS database for a reported spill of five quarts of Lube Oil in 2001. The SPILLS database is maintained by the Washington Department of Ecology (WDE) and is a record of spills reported to the Spill Prevention, Preparedness and Response Division of the WDE. There are no indications that the past or present uses of the site have created recognized environmental conditions in relation to the site or the surrounding properties.

Four facilities, including the existing Tahoma National Cemetery, were identified on the regulatory lists within the established search radii from the site. However, due to regulatory listing information, topographic positioning relative to the site and distance, these facilities do not pose a recognized environmental condition to the site.

Table 4-1: Results of Regulatory Database Searches

Search Distance	No Action Alternative	Site		
	N/A	Site – .25 mile	.25 – 0.5 mile	0.5 – 1.0 mile
Database Searched				
National Priority List (NPL)	N/A	0	0	0
Proposed (NPL) Sites	N/A	0	0	0
Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)	N/A	0	0	0
CERCLIS - No Further Remedial Action Planned (NFRAP)	N/A	0	0	0
Corrective Action Report (CORRACTS)	N/A	0	0	0
Resource Conservation and Recovery Act Information (RCRA Info) List - Treatment, Storage, and Disposal (TSD) Facility	N/A	0	0	0
RCRA Info - Large Quantity Generator (LQG)	N/A	0	0	0
RCRA Info - Small Quantity Generator (SQG)	N/A	0	0	0
RCRA Info – Non-Generator (NonGen)	N/A	2	0	0
Emergency Response Notification System (ERNS)	N/A	0	0	0

	No Action Alternative	Site		
Search Distance	N/A	Site – .25 mile	.25 – 0.5 mile	0.5 – 1.0 mile
Database Searched				
Permitted Landfills List	N/A	0	0	0
Leaking Underground Storage Tank (LUST)	N/A	0	0	0
Underground Storage Tank (UST)	N/A	0	0	0
Voluntary Cleanup Sites (VCP)	N/A	0	0	0
Superfund (Comprehensive Environmental Response, Compensation, and Liability Act) Consent Decrees	N/A	0	0	0
Records of Decision (ROD)	N/A	0	0	0
National Priority List Deletions (Delisted NPL)	N/A	0	0	0
Hazardous Materials Information Reporting System (HMIRS)	N/A	0	0	0
Reported Spills (SPILLS)	N/A	1	0	0
Facility/Site Identification System Listing (ALLSITES)	N/A	3	0	0
Material Licensing Tracking System (MLTS)	N/A	0	0	0
Mines Master Index File	N/A	0	0	0
Polychloryl bi phenyl (PCB) Activity Database System (PADS)	N/A	0	0	0
Indian Reservation	N/A	0	0	0
Uranium Mill Tailings Sites (UMTRA)	N/A	0	0	0
Open Dump Inventory (ODI)	N/A	0	0	0
US Engineering Controls Sites List	N/A	0	0	0
Formerly Used Defense Sites (FUDS)	N/A	0	0	0
Department of Defense Sites (DOD)	N/A	0	0	0
RCRA Administrative Action Tracking System (RAATS)	N/A	0	0	0
Toxic Chemical Release Inventory System (TRIS)	N/A	0	0	0
Toxic Substances Control Act (TSCA)	N/A	0	0	0
Section Seven Tracking Systems (SSTS)	N/A	0	0	0
Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) / TSCA Tracking System (FTTS)	N/A	0	0	0
Aboveground Storage Tank List (AST)	N/A	0	0	0
State Hazardous Substance Inventory Survey (HSIS)	N/A	0	0	0
Former Manufactured Gas Plants (Coal Gas)	N/A	0	0	0
Brownfields	N/A	0	0	0
Sites with Institutional Controls	N/A	0	0	0
Drycleaners	N/A	0	0	0

Source: EDR, 2010.

Prepared by: KMR

Checked by: AWC

Potential Environmental Impacts and Proposed Mitigation Measures – Under the Proposed Alternative, no impacts to solid and/or hazardous wastes would be expected at the Phase 2 development areas. Following cemetery development, approved lawn fertilizers and chemicals will be used on these areas per NCA policy and per manufacturer application recommendations. The storage of lawn chemicals and petroleum products will remain at the existing maintenance facility associated with the cemetery. No changes in waste disposal practices are expected.

Under the No Action Alternative, there would be no new impacts related to waste generation or disposal at the site.

4.3.11 Transportation

The Transportation category refers to changes in the vehicular traffic related to the operations on the property and how it might impact surrounding traffic patterns.

Conditions presented in the Original EIS (1991) – The 1991 EIS includes discussions of the ideal transportation system for a national cemetery, the transportation system at each of the alternative cemetery sites (including average daily traffic counts and planned improvements) and the predicted impact the development of a national cemetery would have on the transportation system in the vicinity of each alternative cemetery site. The 1991 EIS predicted an average of an additional 125 vehicles per day on local roads associated with burials and visitation at the proposed cemetery sites. Based on the 1988 average daily traffic counts and projected 2000 traffic forecasts, the additional 125 vehicles per day was determined to be insignificant at the Tahoma site. The 1991 EIS reported that public transportation was not available to the Tahoma site.

Existing Conditions – The proposed Phase 2 development areas are located within the boundaries of the existing Tahoma National Cemetery and are accessed from maintained roads that have been developed as part of the cemetery infrastructure. The cemetery includes two gated access points along SE 240th Street; one is the main entrance and the other is limited to cemetery maintenance vehicles. No additional access points are planned as part of the Phase 2 development. According to the King County Department of Transportation (DOT), Road Services Division, the average daily traffic volume along SE 240th Street between 164 Avenue SE and 196 Avenue SE in 2005 was approximately 5,000 vehicles (DOT, 2010).



Potential Environmental Impacts and Proposed Mitigation Measures – Under the Proposed Alternative, a temporary increase in traffic is expected during the construction period. The most noticeable temporary increase would be in the form of dump trucks removing unusable excavated soils or returning with suitable fill material. Approximately 4,500 dump truck trips are anticipated over the proposed two year construction period, representing a relatively low intensity level. Other general construction traffic is expected on the order of 20 trips per day of cars or pickup trucks, similar in nature to the current traffic loading.

During operation, following construction, a minimal increase in traffic along SE 240th Street may occur due to additional interments, visitation and maintenance activities at the proposed Phase 2 burial areas. However, this gradual, minimal increase in traffic was accounted for during the site selection process and in the 1991 EIS. In 2008 the cemetery conducted an average of ten interments per weekday. Using the assumptions provided in the 1991 EIS that each burial involves the use of ten vehicles and 2010 weekday visitations are predicted at 15 vehicles per week day, the cemetery would account for approximately 115 vehicles per day on SE 240th Street or approximately 2.3% of the total estimated traffic volume. The Cemetery Director reported that the cemetery has never received a complaint from neighbors about traffic associated with cemetery operations (Pers. Comm. Jim Trimbo, VA, 2010). Impacts to parking are expected to be minimal as additional parking in the proposed Phase 2 development areas is included in the Master Plan. Under the No Action Alternative, there would be no impacts to transportation and/or parking at the Tahoma National Cemetery.

4.3.12 Utilities

The Utilities category refers to changes in the use of public utilities at the property.

Conditions presented in the Original EIS (1991) – The 1991 EIS provides a list of “Public Services”, including the utility providers below.

Telephone:	U.S. West
Power:	Puget Sound Power and Light
Gas:	Washington Natural Gas
Water:	Water District #105
Sewers:	Soos Creek Water and Sewer
Solid Waste:	King County Solid Waste Division

The 1991 EIS concluded that impacts would be limited to the extension of existing utility lines and pipes to each of the proposed alternative cemetery sites, with the exception of sewer service at the Tahoma site. The Tahoma site was identified in the Sewer Local Service Area, which did not permit extension of sewers.

Existing Conditions – The proposed Phase 2 development areas are currently undeveloped and no evidence of public utilities was observed within the boundaries of these areas at the time of the site reconnaissance (January 2010). The following utility providers service the existing cemetery facilities:

Electricity:	Puget Sound Energy
Natural Gas:	Puget Sound Energy
Water:	City of Covington via Cedar River Water and Sewer (municipal provider)
Sewage:	On-site septic system
Solid Waste:	Allied Waste Disposal (private contractor)
Telephone:	Qwest Communications

The major use of potable water at the cemetery is turf irrigation. The turf is irrigated as needed throughout the year to maintain a healthy and stable ground cover. There are no public sanitary or storm sewer systems serving the site. Wastewater is treated by the on-site septic system.

Potential Environmental Impacts and Proposed Mitigation Measures – The cemetery is expected to continue using existing utility providers and minimal changes in utility use would occur as a result of the Phase 2 development. Construction of these areas will require additional infrastructure, primarily consisting of an expanded irrigation system. A minimal increase in the volume of potable water used for turf management would have a minor long-term impact on the public water supply. Additional paved roadways to access the Phase 2 burial areas and other minor impervious areas would result in a minor increase in the volume of stormwater runoff. Implementation of appropriate BMPs, including the continued use of retention ponds and swales, would limit the impacts associated with increased stormwater runoff. A minor increase in the volume of solid waste as a result of increased mementos left at additional gravesites and columbaria may also be expected. The proposed Phase 2 development is not expected to impact remaining utilities at the Tahoma National Cemetery.

Under the No Action Alternative, there would be no impacts on utilities.

4.3.13 Vegetation and Wildlife

The Vegetation and Wildlife section refers to the presence of flora and fauna, protected species and exotic/invasive species that may occur at the site or surrounding area, as well as the potential removal of trees and vegetation from the site. A review of EDR government records search (EDR 2010) and aerial photographs for the proposed project site, as well as ground-truthing completed on January 13, 2010 form the basis of the discussion presented below. The protected species lists reviewed in the EDR NEPA Check are based on a records search of the USEPA Endangered

Species Protection Program Database for King County, Washington. The USEPA Program is part of a collaborative effort between several federal agencies including the United States Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration (NOAA). Correspondence was initiated with the USFWS and NOAA/National Marine Fisheries Service (NMFS) in February, 2010 to solicit information on threatened or endangered species in the project area. To date, no response has been received from either of these agencies.

Conditions presented in the Original EIS (1991) – The 1991 EIS includes a general discussion of vegetation and wildlife that dominate the area west of the Cascade Range in Washington and Oregon, as well as very brief discussions of habitats and wildlife specific to each of the alternative cemetery sites. The Tahoma site was described as densely wooded, consisting of red alder, black cottonwood and western red cedar, with an understory of ferns and shrubs. Wildlife reported at the site consisted of Stellar’s jay, warblers, vireos, black-tailed deer, raccoon and opossum. The 1991 EIS also reported that the Washington State National heritage Data System contained no indication that rare plants, native plant communities, or special animal species were found at any of the proposed alternative cemetery sites.

Existing Conditions: Vegetation – The Tahoma National Cemetery lies within the Puget Lowland Ecoregion (USEPA, 2007), an area that contains the majority of Washington’s population. Aerial photographs of the site dating back to 1965 indicate that this area has predominately consisted of undeveloped woodlands, with conifers becoming more dominant since 1990 (EDR Aerial Photo Decade Package). A site reconnaissance visit conducted in January 2010 revealed conditions that were generally similar to those described in the 1994 wetland delineation report prepared by L.C. Lee and Associates, Inc. The undeveloped portions of the cemetery consist of second growth forest, dominated by red alder (*Alnus rubra*), douglas fir (*Pseudotsuga menziesii*), western hemlock (*Tsuga heterophylla*) and western red cedar (*Thuja plicata*), with undergrowth dominated by vine maple (*Acer circinatum*), sword fern (*Polystichum munitum*), salal (*Gaultheria shallon*) and other species. Other plant species observed at the site in January 2010 included big-leaf maple (*Acer macrophyllum*), black cottonwood (*Populus trichocarpa*), bracken fern (*Pteridium aquilinum*), blackberry (native species *Rubus ursinus* as well as non-native Himalayan variety), English ivy (*Hedera helix*) salmonberry (*Rubus spectabilis*), and hardhack (*Spiraea douglasii*). A more complete list of species observed in the on-site wetlands during the February, 2010 wetland delineation, is provided in Section 4.3.6.

The EDR government records search conducted on the proposed existing cemetery property (EDR 2010) did not identify any federally-listed plant species as occurring in King County, Washington and no federally-listed plant species are known to occur at the project site. The White Topped

Aster (*Aster curtus*), a federal Species of Concern, is known to occur at a particular location 0.5 to 1 mile from the site. This species is not known to occur at the existing cemetery property.

Nearly 60 acres of the 159-acre cemetery property have been converted to cemetery use during the initial phase of cemetery development (Phase I). Portions of the cemetery developed as in-ground burial areas are planted with a turf grass mix that is maintained with frequent mowing, irrigation as-needed, and occasional application of fertilizer and pesticides. Portions of the cemetery developed as assembly areas, the memorial walk, stormwater management areas (basins), operations buildings, etc. have been landscaped, where appropriate, with native plants that provide the desired aesthetic. The remainder of the site has been left in a natural state; dead and dying trees in the forested areas are left standing and neither the understory nor the larger trees in the forested areas are groomed or cut.

Existing Conditions: Wildlife – The grassland edges, stormwater basins, and forested portions of the site serve as wildlife habitat for opportunistic species adapted to suburban environments like coyote, deer, various small mammals, and woodland and meadow birds. Animal species reported for and/or observed at the Tahoma National Cemetery in recent years include: Douglas squirrel (*Tamiasciurus douglasii*), rabbit (*Sylvilagus* sp.), black-tailed deer (*Odocoileus hemionus columbianus*), coyote (*Canis latrans*, seen almost daily), opossum (*Didelphis virginiana*), elk (*Cervus canadensis*, infrequent), black bear (*Ursus americanus*, one individual seen approximately four years ago), Pacific chorus frog (*Pseudacris regilla*), eagle (*Haliaeetus leucocephalus*, does not nest on site), spotted towhee (*Pipilo maculatus*), black capped chickadee (*Poecile atricapillus*), winter wren (*Troglodytes troglodytes*), pileated woodpecker (*Dryocopus pileatus*), Lewis's woodpecker (*Melanerpes lewis*), dark eyed junco (*Junco hyemalis*), and various species of hawks. This assemblage of wildlife is consistent with the types of wildlife reported at the site in the 1991 EIS.

The records search conducted on the existing cemetery property (EDR 2010) identified seven federally-listed animal species/strains or their critical habitat as occurring within a one mile radius of the cemetery (Databases searched include USEPA, Washington Natural Heritage Program, Washington Streamnet and King County). The seven federally-listed species consist of the following three species of birds, two species of fish and two large mammals: bald eagle (*Haliaeetus leucocephalus*), marbled murrelet (*Brachyramphus marmoratus*), Northern spotted owl (*Strix occidentalis caurina*), chinook salmon (*Oncorhynchus tshawytscha*), bull trout (*Salvelinus confluentus*), gray wolf (*Canis lupus*) and grizzly bear (*Ursus arctos horribilis*). During a January 2010 site visit, MACTEC personnel did not find any evidence of these federally listed species on the project site. Cemetery staff reported an occasional sighting of bald eagles

flying over the cemetery, but no nests are known in the vicinity of the site. Northern spotted owls live in old growth forests and marbled murrelets nest in old growth forests, a habitat type that is not present at the cemetery property. There are no perennial streams located at the cemetery and stormwater is captured in on-site retention basins; therefore, salmon habitat is not present at the proposed Phase 2 development areas and stormwater is unlikely to reach salmon-bearing streams in the vicinity of the cemetery. The small population of grizzly bears in Washington State is reported from the North Cascades, well north of the cemetery property. The growing suburban setting surrounding the existing National Cemetery would most likely be undesirable habitat for a grizzly bear or for the gray wolf, both of which are reclusive and are generally found in more remote, wilderness areas. All of these factors taken together indicate that it is unlikely that any of the federally-listed animal species are found in the existing habitat at the Tahoma National Cemetery site.

During the January 2010 site visits, there was limited evidence of wildlife use at the site, most likely because of construction activity going on in the last segment of the Phase I development areas. Management practices in the undeveloped areas at the existing cemetery generally consist of a “hands off” approach, e.g. leaving dead trees (snags) standing and stormwater basins constructed at the site have been planted with native species, which provide some wildlife habitat. Cemetery staff report that the only nuisance animals at the site are moles and gophers which dig up the turf. These animals are managed by a contractor that uses lethal controls for these specific pests (Pers. Comm. Tom Yokes, VA, 2010).

Potential Environmental Impacts and Proposed Mitigation Measures – Executive Order (EO) 11987, Exotic Organisms, prohibits executive agencies from introducing plants or animals which do not naturally occur, presently or historically, in ecosystems in the U.S. Invasive species are not necessarily covered under EO 11987 unless they also qualify as exotic. Invasive and non-native plants and animals do occur in the proposed Phase 2 development areas, as noted above. Under the proposed action, the vegetation in the areas that will be developed for cemetery use will be completely cleared and replaced with a grass mix developed for National Cemeteries, which typically consists of three species of grass. Therefore, invasive species currently established in the portions of the Phase 2 development areas that will be converted to cemetery use, will be extirpated. However, they will be replaced with turf grass species that are not native to the ecoregion. Frequent irrigation is an integral part of the turf management programs at the cemetery which helps the non-native turf survive the dry summers.

It is anticipated that the Phase 2 development at the cemetery will occur in a similar manner to that in Phase I and that the final outcome will continue to provide on-site wildlife habitat. Some forest

land (approximately 10-15 acres) will be converted to burial grounds, which will result in a net loss of forest cover at the cemetery site. New trees may be planted at infrequent intervals in the developed portions of the new burial areas. Current landscaping practice at the cemetery involves the use native species and xeriscaping methods. Cemetery development typically involves clearing, grading and excavating several acres at a time in order to install pre-placed crypts and infrastructure, including irrigation systems and roads. During construction, existing vegetation is typically removed from the burial areas. Cemetery development generally occurs in stages, with new internment areas and/or columbaria for cremains being constructed as needed, which would be consistent with current practices. Therefore, land-clearing is expected to occur gradually, which would reduce the impact on mobile and/or migrating wildlife species. No large towers or other structures will be constructed as part of this project that would adversely impact migrating bird species.

In summary, moderate short-term and long-term adverse impacts would be expected to vegetation as a result of the implementation of the Preferred Alternative. Minor long-term beneficial impacts to vegetation would be expected from the removal of invasive and non-native plant species that are located in the proposed Phase 2 development areas and minor long-term adverse impacts to wildlife would be expected as a result of land conversion from mixed forest to cemetery use.

Under the No Action Alternative, there would be no impacts to vegetation or wildlife.

4.3.14 Water Resources

Water Resources include those portions of the natural environment related to surface water and groundwater.

Conditions presented in the Original EIS (1991) – The 1991 EIS includes a discussion of surface-water and groundwater at the four alternative cemetery sites. The EIS indicated that there were no surface waters located at the proposed Tahoma site and therefore no impacts to surface water would occur as a result of cemetery development. The 1991 EIS did advise, however, that precautions should be taken to avoid runoff of pollutants and spills into wetland areas located at any of the alternative cemetery sites. The groundwater discussion focused on a detailed description of the embalming process, body decomposition and the potential impacts of human burials on groundwater at any given site. Groundwater information specific to the Tahoma site was limited to a discussion of ten well logs examined from wells drilled in the vicinity of the Tahoma site between 1974 and 1985. Based on the review of this information, the 1991 EIS concluded that an aquifer was located no less than 30 feet below ground surface at the Tahoma site and that groundwater would not be impacted as a result of burials at the site.

Existing Conditions – The conditions described in the original EIS are generally representative of current conditions observed on the Tahoma National Cemetery site. No open surface waters (i.e. streams, lakes, natural ponds, etc.) were observed within the study areas during the 2010 site visits. Additionally, no groundwater wells were observed on site.

The Tahoma National Cemetery property generally consists of relatively level terrain, with natural wetland drainages. Nineteen forested and/or scrub-shrub wetland drainages and six man-made stormwater management areas, which generally flow in a south-southeast direction towards an unnamed tributary of Jenkins Creek, were identified in the proposed Phase 2 development areas during a wetlands delineation conducted in February, 2010. No streams or other surface waters were identified on the site during this investigation. The proposed Phase 2 development areas primarily consist of undeveloped woodlands, wetlands and cleared areas.

On average, this area of Washington receives approximately 38 inches of rainfall per year. Historically, December is the wettest month of the year, with an average rainfall of 6.3 inches, while August is historically the driest month with an average of 0.7 inches of rainfall (World Climate, 2008).

According to the United States Geological Survey (USGS) Water Resources website, the project site is located within the Green/Duwamish River Watershed (HUC 17110013) of the Central Puget Sound Watershed. More specifically, the site is located within the Middle Green River Sub-watershed, a 70-square mile watershed which flows to Puget Sound. Several water-bodies located within this watershed and within three miles of the Tahoma National Cemetery have been identified by the United States Environmental Protection Agency (EPA) as impaired water-bodies and are included on the corresponding 303(d) list. The wetlands located on the project site flow into an unnamed tributary of Jenkins Creek. According to the Washington Department of Ecology (WDE) Water Quality Assessment GIS Mapping Tool, the EPA has listed Jenkins Creek on the 303(d) list as an impaired water-body for Fecal Coliform (WDE 2008). Jenkins Creek eventually empties into Big Soos Creek, which is also listed on the 303(d) list for temperature (WDE 2008). According to the EPA Enviromapper GIS Mapping Tool, Shadow Lake, located approximately one mile northeast of the Tahoma National Cemetery site, is identified on the 303(d) list as an impaired water-body for Fecal Coliform (USEPA 2004). Although each of these water-bodies are located proximate to the Tahoma National Cemetery, the development and operation of the Phase 2 burial areas at the site will not contribute to the further degradation of these water-bodies based on hydrological connectivity, source of impairment, and/or the nature of the proposed development.

No water wells were observed on the site during the 2010 site visits; however, one registered well (Site ID #WA5000000011364) was plotted within the boundaries of the proposed southeastern development area at the cemetery site, according to the EDR GeoCheck Report. According to Mr. Jim Trimbo, Cemetery Director for the Tahoma National Cemetery, there are no wells located at the site. Seventy-four registered wells were identified on the GeoCheck Report within one mile of the site. The cemetery receives potable water from the City of Covington via Cedar River Water and Sewer (see Section 4.3.12).

Potential Environmental Impacts and Proposed Mitigation Measures – Development of the proposed Phase 2 burial areas may alter site surface water drainages depending on grading and site design. The site design considers existing drainage pathways and seeps to minimize development or grave placement in wet areas or drainage channels. The federal Clean Water Act, Safe Drinking Water Act and Endangered Species Act direct municipalities to improve stormwater quality and protect watersheds, rivers, streams and drinking water resources. King County environmental regulations have been identified which designate vegetative buffers along the existing wetland drainages. These vegetated buffer areas generally would remain in a natural state, except in areas designated by the VA as necessary for the Phase 2 development.

The proposed Phase 2 development at the Tahoma National Cemetery is not anticipated to have negative impacts on the groundwater of the site, provided the site is developed so that interments are above the zone of saturation. A burial depth of five to seven feet below ground surface in conjunction with the seasonal high water tables may require additional fill in order to provide a suitable separation of the interments from the seasonal high water table. The cemetery expansion area will be designed to ensure graves are not saturated for long periods of time.

Information provided in the 1991 EIS pertaining to body decomposition and embalming as they relate to groundwater remains applicable to the current evaluation. The EPA now regulates formaldehyde as a hazardous substance, though it does not recommend testing drinking water for it and has not issued standards for acceptable concentrations in the water supply. The potential for pollution of the surficial groundwater by formaldehyde remains low. As previously mentioned, burial areas may be elevated with fill to allow the gravesites to remain above the seasonal high water table. This and the use of pre-placed crypts minimize the potential impacts of embalming fluids or pathogens upon the surrounding environment.

During development of the Phase 2 burial areas, appropriate best management practices (BMP's) would be implemented as required by applicable federal, state and local rules and regulations, in

order to minimize potential water quality impacts from construction activities. Examples of some potential BMP's that could be utilized during construction activities include:

- Phased Construction Sequencing
- Natural Vegetation Preservation
- Re-vegetation of Bare Soils
- Seeding
- Mulching
- Sodding
- Gradient Terraces
- Silt Fences
- Grass Lined Channels
- Diversion Dikes
- Fiber Rolls
- Construction Entrances



Development of Phase 2 burial areas will likely include additional stormwater management features to adequately route, store and treat stormwater per the state's NPDES requirements, and would incorporate additional state and local programs, as appropriate. Coordination with King County, WDE and USACE may be necessary if Clean Water Act 401/404 permits are required. Post-construction BMPs for mitigating potential stormwater impacts from increased development on water quality of receiving water bodies could potentially include the following:

- Protection of natural drainage channels
- Preserving riparian buffer vegetation
- Low impact development and other green design strategies
- Grassed swales
- Infiltration basin and trenches
- Dry detention ponds
- Stormwater wetlands/ponds

Under the No Action Alternative, there would be no impacts to water resources.

4.3.15 Environmental Justice / Potential for Generating Controversy

This section includes a brief discussion of minority and/or low-income populations that are in the vicinity of the site, as well as other areas of potential controversy regarding the proposed project.

Conditions presented in the Original EIS (1991) – The 1991 EIS did not include a section on Environmental Justice or Potential for Generating Controversy. However the section pertaining to Income includes the following related/relevant information: in 1988, the median household income in the area of the Tahoma site was \$45,737 and the Puget Sound area had higher per capita income than the United States average for reported years 1979, 1981, 1983 and 1985. A more detailed discussion of Environmental Justice/Potential for Generating Controversy, specific to the Tahoma National Cemetery site and the proposed Phase 2 development areas, is provided below.

Existing Conditions – Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) requires that federal projects consider whether the project would have an adverse effect on minority or low-income populations. The project site under consideration in this Tiered EA is an approximate 52-acre study area within the boundaries of the existing Tahoma National Cemetery. The areas surrounding the Tahoma National Cemetery primarily consist of undeveloped woodlands and low-density residential properties, with Tahoma High School located immediately to the southwest of the cemetery.

According to 2000 census data (the most recent complete dataset available) King County has a median family income of \$66,035 compared to the national average of \$50,046 and a Washington state average of \$53,760. Additional 2000 data indicates that 8.4% of people in King County are below the poverty level compared to the national average of 13.2% and state average of 10.6%. According to census tract data from 2000, the percentage of persons living in Census Tract 318, which contains the project site, consists of 90.0 percent white (may include Hispanics and/or Latinos), 4.1 percent Asian, 1.1 percent black or African-American, 0.3 percent American Indian or Alaska Native, 0.5 percent native Hawaiian or other Pacific Islanders, 2.7 percent two or more races and 1.0 percent some other race (may include Hispanics and/or Latinos). The median family income in Census Tract 318 is \$70,446 and the percent of people below the poverty level is 2.5% (USCB 2000).

Potential Environmental Impacts and Proposed Mitigation Measures – The proposed Phase 2 development areas are located within the boundaries of the existing Tahoma National Cemetery, currently in operation. Based on the nature of the proposed development, the proposed action at the Tahoma National Cemetery will have minimal adverse affects on the local population and will not disproportionately affect minority and/or low-income populations. Several agencies and tribes

have responded to a Request for Information (Section 6.0 and Appendix B), primarily indicating that they have no issues or concerns regarding the proposed project. No letters have been received expressing negative comments. Specific comments and/or requests that were made by individual agencies or tribes have been referenced in the relevant sections above.

Under the No Action Alternative, controversy may be generated by local veterans, and their public officials and supporters, who would lose the only national cemetery located in Washington State by 2016 if additional burial areas are not developed.

4.3.16 Federal Compliance

The analysis and recommendations in this Tiered EA support the conclusion that the Phase 2 development of the Tahoma National Cemetery by the Department of Veterans Affairs will be in compliance with Federal Regulations (Table 4-2).

Table 4-2. Compliance with Federal Regulations

Regulation	Subject	Project Compliance Issues
EO 11988	Floodplain Management	No portions of the site or immediate surrounding area are located within either the 100-year or 500-year floodplains.
40 CFR 230	Discharge of Dredge or Fill Material	A Section 404 permit will be submitted by the VA to the USACE Seattle District for the anticipated fill of jurisdictional wetlands for cemetery development.
EO 11990	Protection of Wetlands	Wetlands at the proposed Phase 2 development areas have been delineated in the field. The USACE Seattle District has verified the delineated jurisdictional Waters of the U.S. in a letter dated March 11, 2011. Impacts to delineated wetlands will be avoided and minimized to the greatest extent possible as part of the cemetery expansion, per CFM policy and CWA requirements. A permit from the USACE will be required to impact the 0.35 acre of estimated wetlands impacts (application submitted August 2011).
EO 11987	Exotic Organisms	Limited exotic / invasive species are present at the site. Development of proposed Phase 2 burial areas will involve the eradication of existing exotic/invasive species; however, they may be replaced with turf grass species that are not native to the ecoregion, but not invasive.
EO 12898	Environmental Justice	No disproportionate impact on minority and disadvantaged populations is expected as a result of this proposed project.
33 USC 1323, Section 313; 40 CFR 122	Clean Water	NPDES permit(s) will be obtained as necessary for grading/construction activities during the Phase 2 development of the proposed burial areas.
PL 93-205	Endangered Species	A “no effect” determination for federally-listed species is expected as a result of proposed Phase 2 development at the existing National Cemetery.
16 USC 1274 ET SEQ	Wild and Scenic Rivers	The site is not in an area that has federal designation as Wild and Scenic Rivers.

Regulation	Subject	Project Compliance Issues
Noise Control Act of 1972	Noise Control	Compliance with federal noise standards is expected during development activities at the Phase 2 burial areas.
PL 93-523	Safe Drinking Water	Groundwater is not expected to be impacted as a result of the Phase 2 development.
PL 97-348	Coastal Barriers	King County is a regulated coastal county; however, the site is not in a coastal barrier.
16 USC 1451 Et SEQ, Amended by PL 101-508	Coastal Zone Management	Although King County is a regulated coastal county, the Washington Shoreline Management Act only applies to upland areas within 200 feet of the shoreline edge, with the exception of floodplains and wetlands, which are discussed above.
40 CFR 117	Reportable Quantities of Hazardous Substances	Reportable quantities of hazardous substances are not known to occur at the site, nor expected to be generated by the proposed project.
40 CFR 761	PCB Issues	PCBs are not reported from the project site.
36 CFR 800	Historic Preservation	A Cultural Resources Assessment for the Tahoma National Cemetery Expansion (Phase 2) resulted in a finding of "No Historic Properties Affected" within the APE. The DAHP concurred with the findings of the report.

Source: MACTEC, 2011

Created by: KMR

Checked by: AWC

4.3.17 Cumulative Impacts

This section includes a brief discussion of cumulative impacts that may occur as a result of the proposed project. Cumulative impacts are those impacts that result from the incremental impact of an action added to other past, present, and reasonably foreseeable actions in the future. The National Environmental Policy Act (NEPA) requires that federal projects undergoing NEPA analysis consider cumulative impacts. The project site under consideration in this Tiered EA is a 52-acre study area within the boundaries of the existing Tahoma National Cemetery. The three environmental criteria affected by the proposed action that have the greatest risk of cumulative impacts to the surrounding area are the loss of forested wetlands, wildlife habitat and the potential for impacts to groundwater and/or surface water.

The proposed Phase 2 development of approximately 15 to 20 of these acres is in general compliance with the Master Plan for the entire 159-acre cemetery site evaluated in the 1991 EIS. There are no immediate plans for the development of the remaining 20 to 25 acres within the study area. These areas are likely to remain in their undeveloped state for at least 10 years until additional burial areas are needed for the continued future operation of the cemetery.

The areas surrounding the Tahoma National Cemetery primarily consist of undeveloped woodlands and low-density residential properties, with Tahoma High School located immediately to the southwest of the cemetery. Based on a review of historical aerial photos, it is evident that the greatest increase in development in the areas surrounding the National Cemetery is primarily

associated with residential properties. Information pertaining to future planned projects in the vicinity of the cemetery was requested from the King County Department of Development and Environmental Services (DDES). To date, no response has been received from the DDES. The King County Countywide Planning Policies document updated October 2008 was reviewed for this assessment. This document provides guidance for the planned development of King County, focusing on areas of Land Use, Transportation, Urban and Rural Growth, Affordable Housing, Economic Development and Environmental Protection, including wetlands, aquifers, fish and wildlife, and air and water quality. The document was implemented to address growth management issues in King County in an effort to limit, control and mitigate cumulative impacts associated with increased growth in the county. The majority of property in the vicinity of the cemetery is zoned for Rural Residential Development. This zoning classification limits development to low-density residential properties and supports agricultural and forestry uses of the property. Given the planning policies and zoning designations in the areas surrounding the cemetery, as well as the phased development approach and limited affected acreage for the proposed cemetery project, areas of wetland and habitat loss, and impacts to groundwater and/or surface water are expected be negligible at both a local and regional level as a result of the development and operation of the preferred alternative (Alternative A).

5.0 SUMMARY AND CONCLUSIONS

Tiered Environmental Assessment Summary

Project Location: Kent, Washington
Project Title: Proposed Phase 2 Development at the Tahoma National Cemetery
Assessed By: MACTEC Engineering and Consulting, Inc.

Summary of Environmental Impact of the Proposed Project:

This Tiered EA was prepared for the proposed Phase 2 development of approximately 15-20 acres within a 52-acre study area at the existing Tahoma National Cemetery in general accordance with the Master Plan for the entire 159-acre cemetery. No significant adverse environmental impacts are anticipated for the proposed development of the project site.

Recommendation:

- Finding of No Significant Impact. (This project will not result in a significant adverse impact on the environment and will not result in highly controversial adverse public reaction; therefore an environmental impact statement is not required.)
- An Environmental Impact Statement is required.

Table 5-1. Effects Summary

Attributes	Alternatives	
	No Action	A
Aesthetics	0	0
Air Quality	0	-
Community Services	0	0
Cultural Resources	0	0
Economic Activity	0	0
Floodplains, Wetlands, Coastal Zone, etc.	0	-
Geology and Soils	0	-
Hydrology and Water Quality	0	-
Land Use	0	0
Noise	0	-
Potential for Generating Substantial Controversy	-	0
Real Property	0	0
Resident Population	0	0
Solid / Hazardous Waste	0	0
Traffic, Transportation and Parking	0	0
Utilities	0	0
Vegetation and Wildlife	0	-
Provide Burial Services to Veterans	- - -	+

Source: MACTEC, 2011 Created by: KMR Checked by: AWC

Note: + = Beneficial Effect -- = Moderate Effect
 - - - = Severe Effect - = Minimal Effect
 0 = No Significant Effect

Environmental Assessment Summary (continued)

Project Location: Kent, Washington

Project Title: Proposed Phase 2 Development at the Tahoma National Cemetery

Definitions of Impacts

1. Beneficial No adverse effect anticipated. Effect would provide a favorable, advantageous and/or improved condition.
2. Severe Complete destruction, disruption, violation of standards, incompatibility, disturbance, or surpassing capability of the attribute under consideration.
3. Moderate Considerable destruction, disruption, violation of standards incompatibility, disturbance or surpassing of capability of the attribute. However, the effect can be minimized through further study and mitigation.
4. Minimal Temporary or minor destruction, disruption, violation of standards, incompatibility, disturbance or surpassing of capability of the attribute. This effect can be mitigated through standard design, construction or operational procedures.
5. None No effect anticipated.

Project Description:

Refer to Section 2 of the Tiered EA.

Alternatives Considered:

The “No Action” alternative and alternative sites were evaluated and considered for the proposed national cemetery. One alternative site was evaluated. The alternatives are described in Section 3 of the Tiered EA and Section 4 of the 1991 EIS.

Environmental Impacts:

Refer to Section 4 of the Tiered EA.

Mitigative Actions:

Refer to Section 4 of the Tiered EA.

6.0 AGENCY COORDINATION / CONTACT LIST

A Request for Information dated February 5, 2010 (Appendix B) was sent to numerous Federal, State and Local Agencies. The Washington State Historic Preservation Office (SHPO) and four Native American Tribes were also contacted under separate cover (Appendix B). The following agencies and/or persons responded during the preparation of this Tiered EA:

Federal Agencies

U.S. Department of Agriculture
Natural Resources Conservation Service
Charles Natsuhara – Area Resource Soil
Scientist
Puyallup, WA

U.S. Department of Agriculture
Forest Service
Mary Wagner – Regional Forester
Portland, OR

U.S. Environmental Protection Agency
Office of Environmental Assessment
Eric Peterson
Seattle, WA

U.S. Department of Veterans Affairs
National Cemetery Administration
Washington, DC

State Agencies

Washington Department of Archaeology &
Historic Preservation
Dr. Robert Whitlam – State Archaeologist
Olympia, WA

Washington Department of Ecology
Environmental Review Section, SEPA
Peg Plummer
Olympia, WA

Washington Department of Fish & Wildlife
North Puget Sound, Region 4
Kye Iris
Mill Creek, WA

Washington Department of Natural Resources
Asset & Property Management Division
Dave Driskill
Olympia, WA

Local Agencies

Tahoma National Cemetery
James Trimbo – Cemetery Director
Tom Yokes – Cemetery Foreman
Kent, WA

Northwest Indian Fisheries Commission
Sarah Jones
Olympia, WA

Native American Consultations

Puyallup Tribe of Indians
Brandon Reynon – Tribal Archaeologist/
Cultural Regulatory Specialist
Tacoma, WA

Individuals / Groups

kpff Consulting Engineers
Mr. Jesse Williams – PE, LEED AP
Seattle, WA

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- Personal Communication with Mr. Tom Yokes, Cemetery Caretaker Supervisor. January, 2010. On-site interviews to obtain information about the Tahoma National Cemetery and surrounding areas.
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8.0 LIST OF PREPARERS

Allen Conger (B.S. Natural Resources and Ecology) served as the principal project scientist, which included providing direction and supervision of field activities and senior technical review of the report. Mr. Conger is the senior Natural Resources Manager for MACTEC and has over 25 years experience in preparing assessments.

Judith L. Dudley (Ph.D. Ecosystems Ecology, M.S. Aquatic Ecology, B.A. Biology) was the primary author for report sections related to vegetation and wildlife, including protected species, and utilities. Dr. Dudley also provided field services and technical assistance during report preparation. Dr. Dudley is a Principal Scientist for MACTEC and has over 20 years experience in environmental research and assessments.

Karl M. Rains (B.A. Business Administration, M.S. Environmental Law, M.S. Earth and Environmental Resources Management) served as the MACTEC project coordinator and primary author for sections related to solid and hazardous waste, and federal compliance, as well as the executive summary, project purpose and need, project alternatives, and summary and conclusions. Mr. Rains also provided field services and technical assistance during report preparation. Mr. Rains is a Project Professional with MACTEC and has completed numerous NEPA related documents for both public and private sector clients.

Richard G. Harmon (M.S. Coastal Ecology) provided third-party technical review of the report. Mr. Harmon is a Senior Natural Resource Scientist/Project Manager with MACTEC and has over two decades of experience with environmental analysis of impacts from highway, utility plant expansions and other development projects.

Suzanne E. Baird (B.S. Environmental Science, M.S. Toxicology) provided technical assistance during report preparation. She was the primary author for report sections related to air quality, community services, economic activity and environmental justice/potential for generating controversy.

William L. Medlin (B.S. Biological Sciences) provided field services and technical assistance during report preparation. He was the primary author for report sections related to floodplains, wetlands and water resources.

Susan Kelly (B.S. Civil Engineering, M.S. Hydrogeology) provided technical assistance during report preparation. She served as primary author for the report sections related to geology, soils, and prime farmland.

APPENDICES

APPENDIX A
PHOTOLOG

Appendix A - Photographs Taken: January and February, 2010



Photo 1 – View of the main entrance to the Tahoma National Cemetery, facing north-northwest.



Photo 2 – View of the visitor center and main roadway located in the southern portion of the site, facing west-northwest.

Appendix A - Photographs Taken: January and February, 2010



Photo 7: View of the main road with Mt. Rainer in the background, facing south-southeast.



Photo 8: View of burial areas along the main road, facing north.

Appendix A - Photographs Taken: January and February, 2010



Photo 5 – View of the inundated portion of Wetland D located in the northern portion of the site, facing east.



Photo 6 – View of the second-growth upland forest located in the in the western portion of the site near the property line, facing west-northwest.

Appendix A - Photographs Taken: January and February, 2010



Photo 7 – View of Wetland L located in the southern portion of the site, facing north-northwest.



Photo 8 – View of Wetland A, a man-made stormwater management area located in the northern portion of the site, facing east.

Appendix A - Photographs Taken: January and February, 2010



Photo 9: View of stormwater management area located in the southeastern development area, facing northwest.



Photo 10: View of the maintained grass field in the southeastern development area, facing south.

APPENDIX B

AGENCY AND TRIBAL CORRESPONDENCE



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
SEATTLE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 3755
SEATTLE, WASHINGTON 98124-3755

Regulatory Branch

MAR 11 2011

Mr. Edison B. Carlos
Office of Construction and Facilities Management
811 Vermont Avenue Northwest
Washington DC 20420

Reference: NWS-2010-450
Department of Veterans Affairs

Dear Mr. Carlos:

On July 8, 2010, we inspected the VA Cemetery property at Kent, Washington in response to your request for verification of the jurisdictional limits of waters of the U.S. in the review area. The U.S. Army Corps of Engineers has determined that Wetland A, C, D, E, F, G, J, K, L, M, N, P, PP, Q, S, T, U, V, W, X, Y, and Z are waters of the U.S. The enclosed drawings dated January 2, 2011, accurately identify the boundaries of waters of the U.S. in the review area.

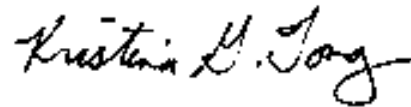
However, we have also determined that Wetland "B" and "H" are not waters of the U.S. As such, work that would occur within these areas does not require Department of the Army authorization under Section 404 of the Clean Water Act. Other state and local regulations may still apply to these wetlands. For example, the Washington State Department of Ecology (Ecology) may regulate these wetlands. The enclosed Ecology letter and Ecology *Focus* sheet explain how Ecology regulates this type of wetlands. You should contact Ecology's Federal Permit Coordinator at (360) 407-6927 or ecyrefedpermits@ecy.wa.gov for more information on how to obtain State approval for your project. We are sending a copy of this letter to Ecology and to the Environmental Protection Agency's Aquatic Resources Unit.

This approved jurisdictional determination is valid for a period of 5 years from the date of this letter unless new information warrants revisions of the determination. A copy of this jurisdictional determination, dated March 9, 2011 can be found on our website at <http://www.nws.usace.army.mil/> click on Regulatory, Regulatory/Permits, Jurisdictional Determinations. If you object to this determination, you may request an administrative appeal under our regulations (33 CFR 331) as described in the enclosed *Appeal Process Fact Sheet* and the *Notification of Administrative Appeal Options and Process and Request for Appeal* form.

A copy of this letter with drawings will be furnished to Alan W. Conger, Mactec, 720 Gracern Road Suite 132, Columbia, South Carolina 29210. If you propose to do any work in the areas identified to be waters of the U.S., you should contact our office prior to commencing work to determine permit requirements.

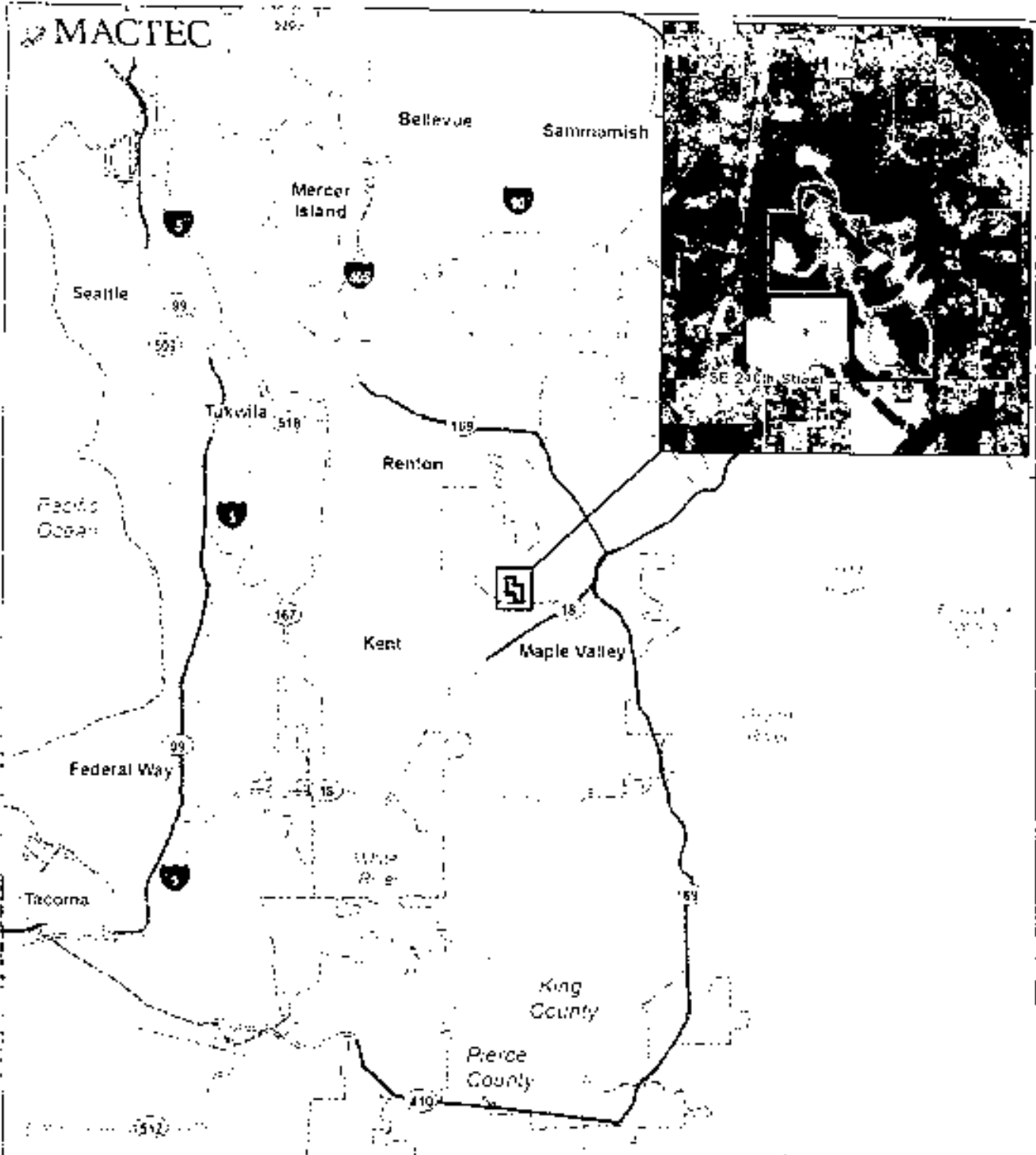
If you have any questions, please contact Lori C. Lull at (206) 766-6438 or via email at Lori.C.Lull@usace.army.mil.

Sincerely,

A handwritten signature in black ink that reads "Kristina H. Tong". The signature is written in a cursive style with a large, looping initial "K".

Kristina Tong, Senior Scientist
Regulatory Branch

Enclosures



LEGEND

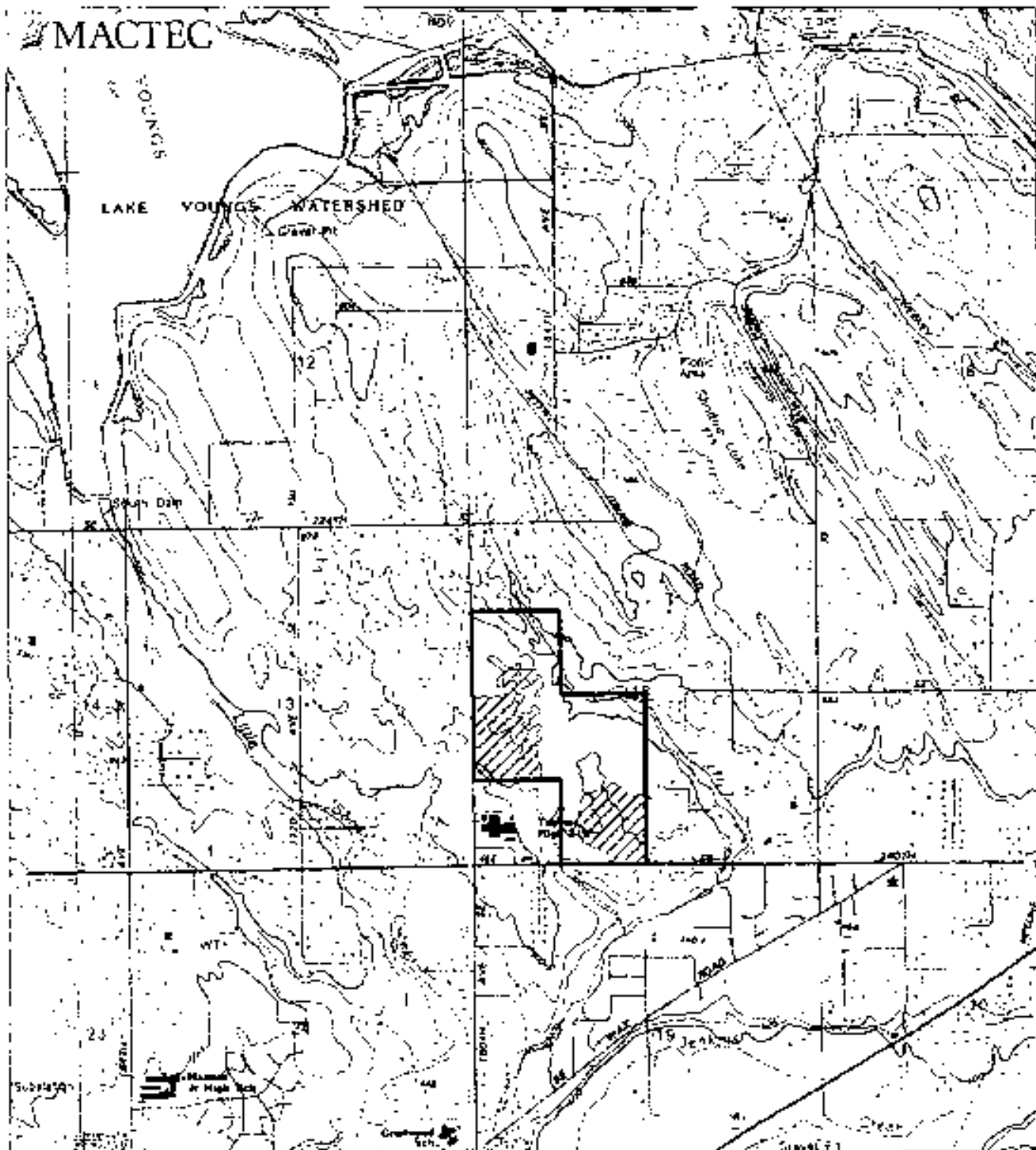
- National Cemetery Property Boundary
- Proposed Phase 2 Development Area




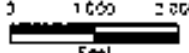


Created by GBS
 Approved by KLR
 June 3, 2011

British Columbia
 Washington
 Seattle
 Study Area
 Portland
 Oregon
 Pacific Ocean

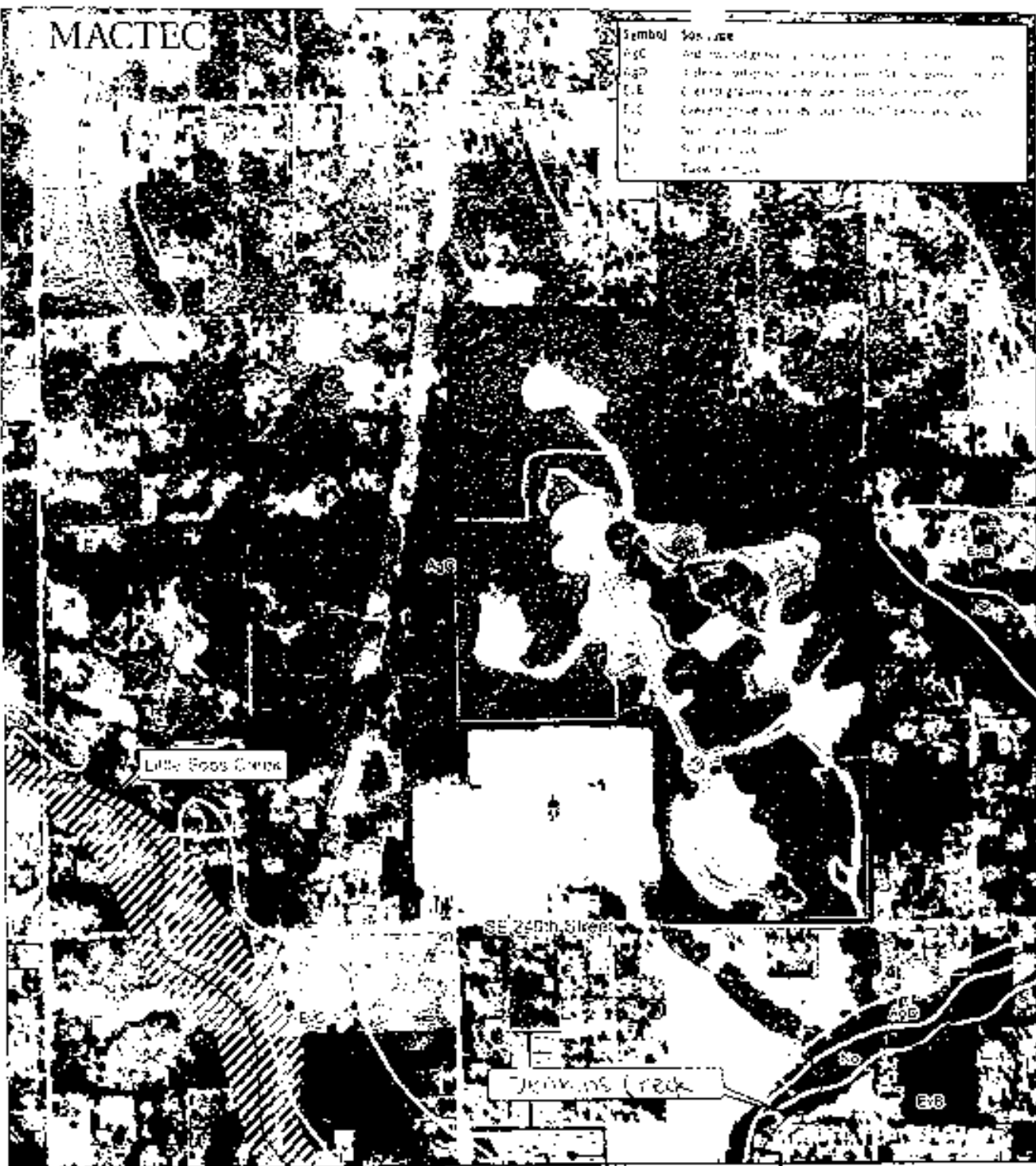
Figure 1:
Project Location Map
 NW-2010-450
 Tanoma National Cemetery
 Proposed Phase 2
 Development Area
 Tanoma, WA



<p>LEGEND</p> <p>  National Cemetery Property Boundary  Proposed Phase 2 Development Area </p> <p>   0 1000 2000 Feet Created by CGS Approved by KLR Jan 3, 2011 </p>	<p>British Columbia</p> <p>Washington</p> <p>Seattle</p> <p>Study Area</p> <p>Portland</p> <p>Oregon</p> <p>Pacific Ocean</p>	<p>Figure 2: Topographic Contour Map NOV 2010 - 450 Tahorra National Cemetery Proposed Phase 2 Development Area Tahorra WA</p>
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MACTEC

Symbol	Soil Code
(Symbol)	Andisol (gley) (Ustic) (Ustic) (Ustic)
(Symbol)	Andisol (gley) (Ustic) (Ustic) (Ustic)
(Symbol)	Andisol (gley) (Ustic) (Ustic) (Ustic)
(Symbol)	Andisol (gley) (Ustic) (Ustic) (Ustic)
(Symbol)	Andisol (gley) (Ustic) (Ustic) (Ustic)
(Symbol)	Andisol (gley) (Ustic) (Ustic) (Ustic)
(Symbol)	Andisol (gley) (Ustic) (Ustic) (Ustic)
(Symbol)	Andisol (gley) (Ustic) (Ustic) (Ustic)
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LEGEND

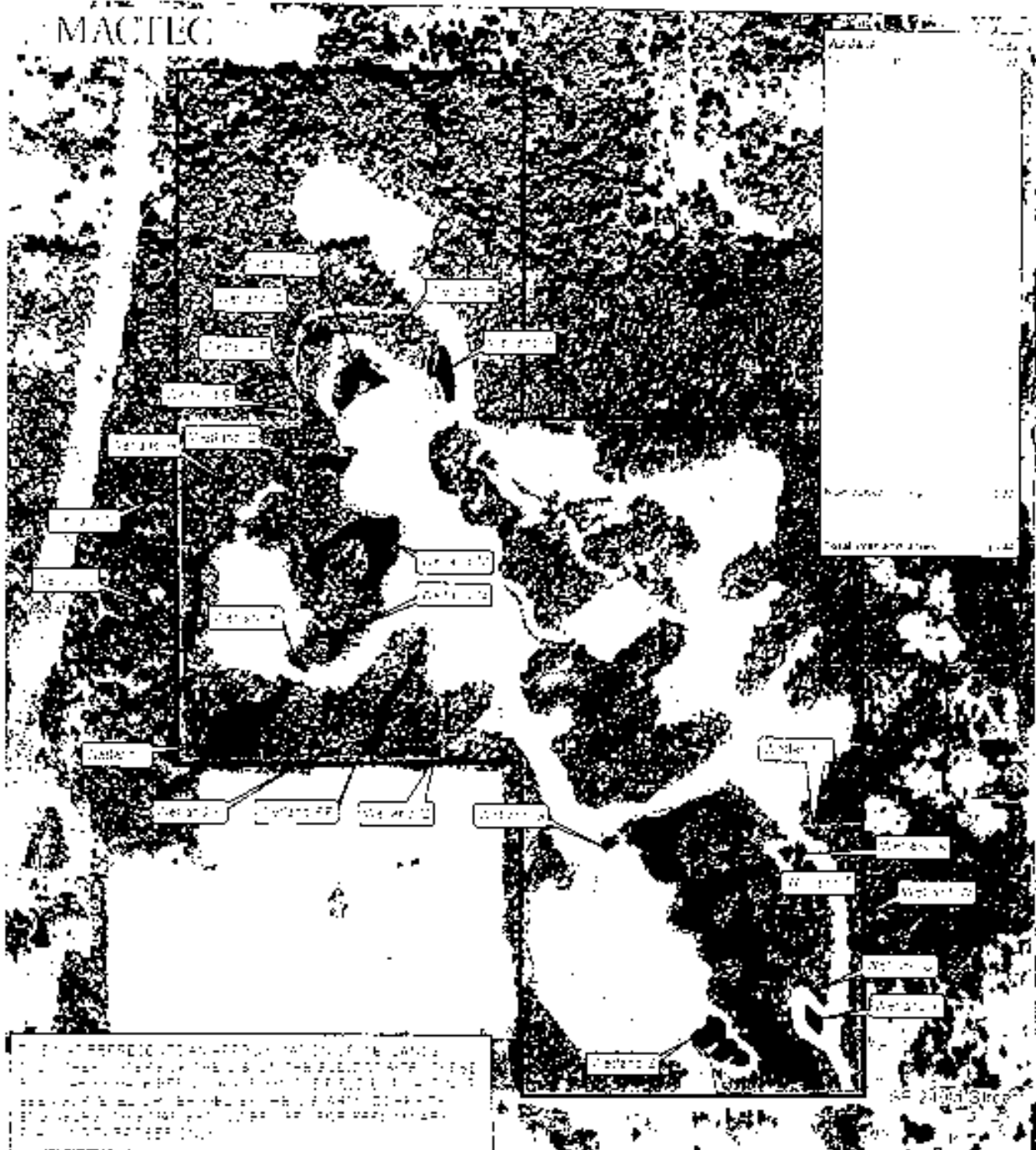
- Warrior Cemetery Property Boundary
- Proposed Phase 2 Development Area
- Soil Map Unit (NRCS)
- 100 Year Floodplain (FEMA)
- Unimproved Interim Stream (USGS)
- Perennial Stream (USGS)


 0 100 500
 Feet
 Created by: GBS
 Approved by: KJR
 June 3, 2011

British Columbia
 Washington
 Seattle
 Study Area
 Pacific Ocean
 Portland
 Oregon

Figure 5.
 NRCS Soil and
 FEMA Floodplain Map
 NWS 2010-450
 Tahoma National Cemetery
 Proposed Phase 2
 Development Area
 Tahoma, WA

MACTEC



Area #	Area Name	Area Size (Acres)
1	Wetland 1	1.25
2	Wetland 2	1.50
3	Wetland 3	1.75
4	Wetland 4	2.00
5	Wetland 5	2.25
6	Wetland 6	2.50
7	Wetland 7	2.75
8	Wetland 8	3.00
9	Wetland 9	3.25
10	Wetland 10	3.50
11	Wetland 11	3.75
12	Wetland 12	4.00
13	Wetland 13	4.25
14	Wetland 14	4.50
15	Wetland 15	4.75
16	Wetland 16	5.00
17	Wetland 17	5.25
18	Wetland 18	5.50
19	Wetland 19	5.75
20	Wetland 20	6.00
21	Wetland 21	6.25
22	Wetland 22	6.50
23	Wetland 23	6.75
24	Wetland 24	7.00
25	Wetland 25	7.25
26	Wetland 26	7.50
27	Wetland 27	7.75
28	Wetland 28	8.00
29	Wetland 29	8.25
30	Wetland 30	8.50
31	Wetland 31	8.75
32	Wetland 32	9.00
33	Wetland 33	9.25
34	Wetland 34	9.50
35	Wetland 35	9.75
36	Wetland 36	10.00
37	Wetland 37	10.25
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39	Wetland 39	10.75
40	Wetland 40	11.00
41	Wetland 41	11.25
42	Wetland 42	11.50
43	Wetland 43	11.75
44	Wetland 44	12.00
45	Wetland 45	12.25
46	Wetland 46	12.50
47	Wetland 47	12.75
48	Wetland 48	13.00
49	Wetland 49	13.25
50	Wetland 50	13.50
51	Wetland 51	13.75
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77	Wetland 77	20.25
78	Wetland 78	20.50
79	Wetland 79	20.75
80	Wetland 80	21.00
81	Wetland 81	21.25
82	Wetland 82	21.50
83	Wetland 83	21.75
84	Wetland 84	22.00
85	Wetland 85	22.25
86	Wetland 86	22.50
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90	Wetland 90	23.50
91	Wetland 91	23.75
92	Wetland 92	24.00
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307	Wetland 307	77.75
308	Wetland 308	78.00
309	Wetland 309	78.25
310	Wetland 310	78.50
311	Wetland 311	78.75



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

*1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov*

April 14, 2010

Mr. Edison B. Carlos
Office of Construction & Facilities
Department of Veterans Affairs
Washington, D. C. 20420

Re: Tahoma National Cemetery Phase 2 Expansion Project
Log No.: 030810-08-VA

Dear Mr. Carlos:

We have been contacted by Jason Cooper, AMEC, and provided the professional archaeological survey report for the proposed Tahoma National Cemetery Phase 2 Expansion Project in King County, Washington.

We concur with the determination of No Historic Properties Affected.

We would also appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4.). Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and we look forward to receiving the professional cultural resources survey report on the results of your efforts and your Determination of Effect.

Sincerely,

Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 586-3080
email: rob.whitlam@dahp.wa.gov

cc: K. Schammell





STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

*1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov*

March 8, 2010

Mr. Edison B. Carlos
Office of Construction & Facilities
Department of Veterans Affairs
Washington, D. C. 20420

Re: Tahoma National Cemetery Phase 2 Expansion Project
Log No.: 030810-08-VA

Dear Mr. Carlos:

Thank you for contacting our department. We have reviewed the materials you provided for the Area of Potential Effect (APE) for proposed Tahoma National Cemetery Phase 2 Expansion Project in King County, Washington.

We concur with your determination of the Area of Potential Effect (APE) as described and presented in your figures and text. We look forward to receiving the results of your consultations, professional archaeological survey report, and Determination of Effect.

We would also appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4.). Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and we look forward to receiving the professional cultural resources survey report on the results of your efforts and your Determination of Effect.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Whitlam".

Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 586-3080
email: rob.whitlam@dahp.wa.gov

cc: K. Schammell





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

March 1, 2010

Doctor Allyson Brooks, Ph.D.
State Historic Preservation Officer
Washington State Department of Archaeology & Historic Preservation
1063 S. Capitol Way, Suite 106
P.O. Box 48343
Olympia, Washington 98504-8343

Subject: Section 106 Consultation for the Phased Development at the Tahoma National Cemetery, King County, Washington.

Dear Dr. Brooks:

The United States Department of Veterans Affairs (VA), National Cemetery Administration (NCA) plans to develop the next phase of burial areas at the existing Tahoma National Cemetery in Covington, King County, Washington, a property eligible for the National Register of Historic Places. The existing cemetery is located at 18600 SE 240th Street (Figure 1) and approximate coordinates are N47°23'30.92"/W122°05'48.64". Originally opened in 1997, the NCA is projecting gravesite depletion in currently developed areas of the cemetery by approximately 2016. In accordance with the master plan for the entire 159-acre cemetery, the NCA has proposed the development of approximately 15-20 acres of the 101 undeveloped acres remaining at the cemetery site. The project is a federal undertaking subject to Section 106 of the National Historic Preservation Act (NHPA), as amended. The VA has contracted with MACTEC Engineering and Consulting, Inc. (MACTEC) to assist with the environmental documentation for the proposed phased development. MACTEC has subcontracted with AMEC Earth and Environmental, Inc. (AMEC) to conduct a cultural resources assessment of the project area in compliance with Section 106 of the NHPA.

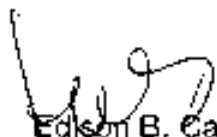
Tahoma National Cemetery is located near the community of Covington, Washington within Section 18 of Township 22 North, Range 6 East, Willamette Meridian. Two areas within the existing boundaries of the cemetery will be studied for the proposed Phase 2 expansion (Figure 2). A total of 52 acres will be included in the evaluation. Approximately 15-20 acres of undeveloped land will be utilized to develop approximately 21,000 gravesites for both casketed and cremated remains. Also included in this project will be the installation of 6,000

pre-placed crypts in sections previously cleared for traditional burials. The additional acreage to be studied includes wetlands and associated buffers, as well as additional undeveloped property that is not currently designated as burial areas. The goal of the cultural resources assessment is to determine if proposed Phase 2 development at the existing cemetery will have any effect on historic properties as defined by NHPA, specifically archaeological resources, traditional cultural properties, and historic buildings/structures. Figure 2 shows the proposed project's Area of Potential Effects (APE).

In order to ensure that the VA takes into account the effects of this undertaking on properties listed in or eligible for listing in the National Register of Historic Places (NRHP), the VA is initiating formal Section 106 consultation pursuant to 36 CFR 800.2(c)(4). You may contact us at any time for assistance with the process and/or the undertaking.

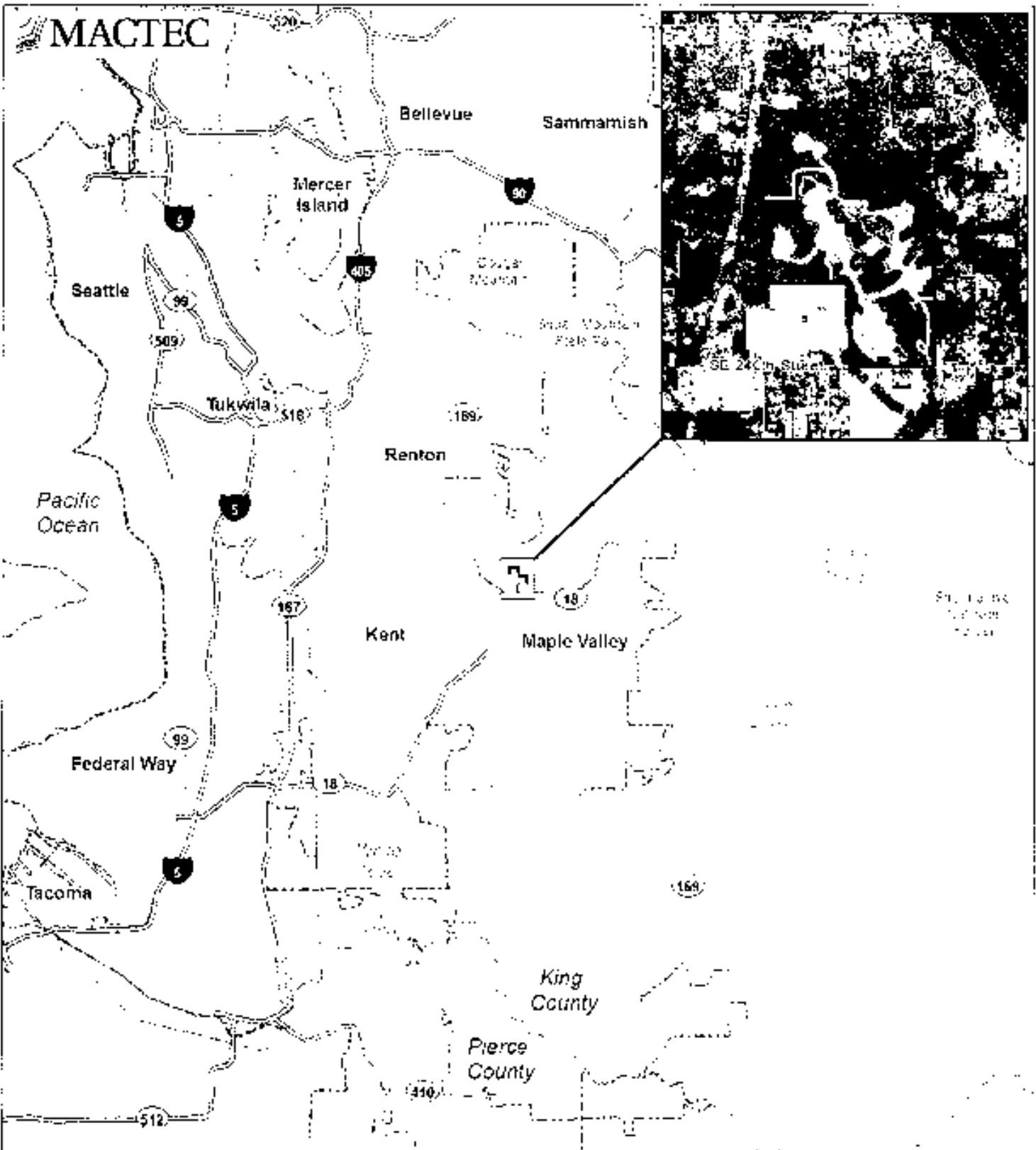
Your response to this letter, acknowledging your interest in participating in this undertaking as a consulting party, and in commenting on our recommendation of the project's Area of Potential Effects (APE) is greatly appreciated. The VA is also inviting comments on the proposed project from the Muckleshoot, Puyallup, Colville and Yakama Tribes. Should you have any questions about this project, please contact me at (202) 461-8940 or ed.carlos@va.gov.

Sincerely,



Edson B. Carlos, PE
Project Manager
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management

Enclosures: Figure 1: Project Location Map
Figure 2: Aerial Photograph



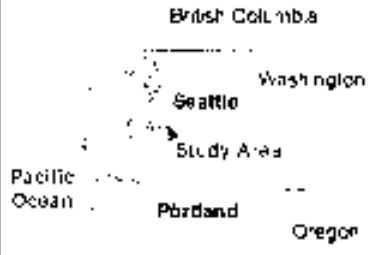
LEGEND

National Cemetery Property Boundary
 Proposed Phase 2 Expansion Area



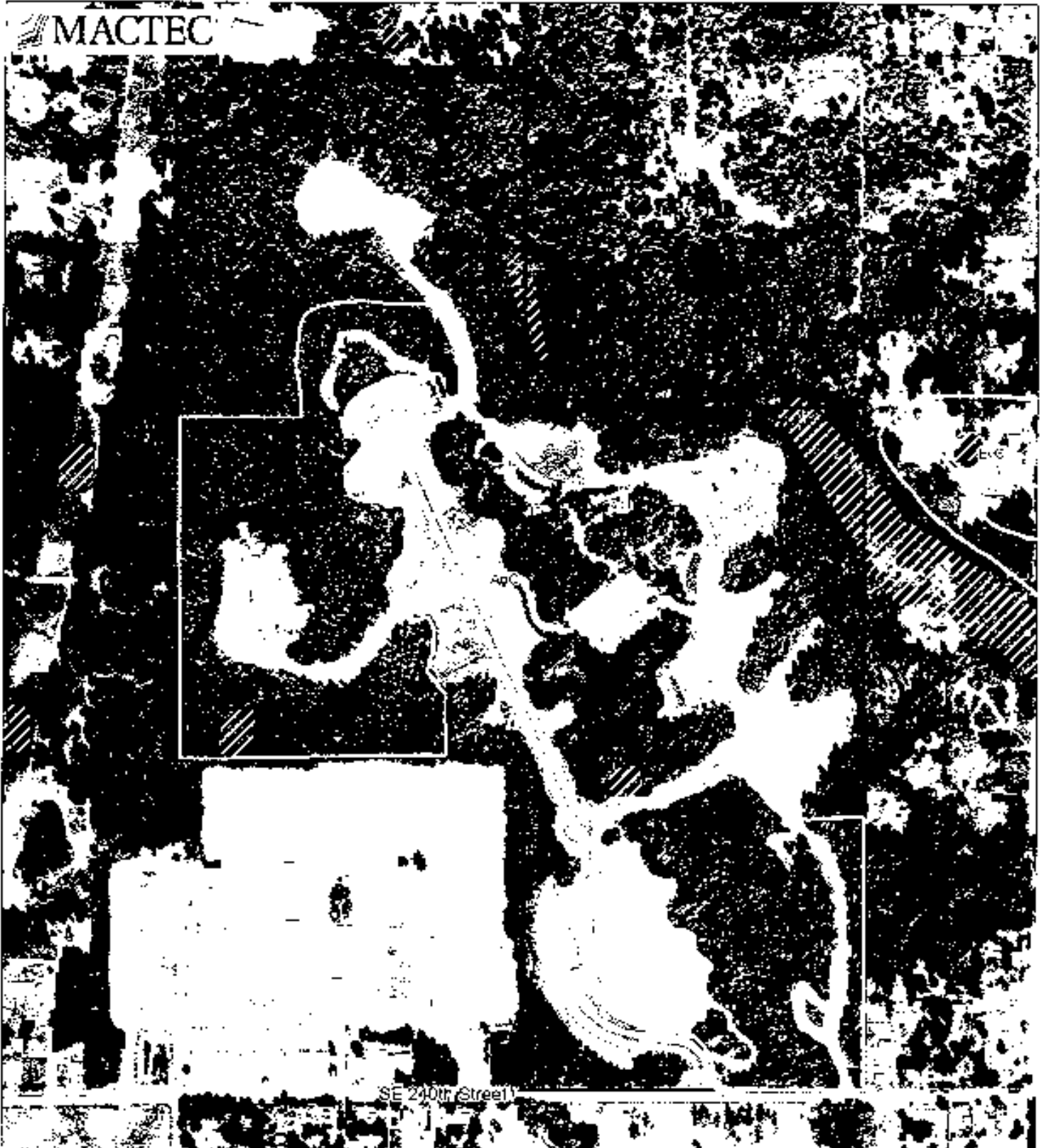
0 1 2
Miles

Created by: CGS
 Approved by: KVR
 February 5, 2010




**Figure 1:
Project Location Map**

Proposed Tacoma
 National Cemetery Expansion
 Tacoma, WA



SE 240th Street

<p>LEGEND</p> <ul style="list-style-type: none"> - Intermittent Stream (USGS) - Proposed Phase 2 Expansion Area ▭ National Cemetery Property Boundary - Alderwood gravelly sandy loam (NRCS) - KWA Wetland (USFWS) <div style="text-align: center;">  <p>0 200 400 Feet</p> </div> <p>Created by: GGS Approved by: KMR February 5, 2010</p>	<p>British Columbia</p> <p>Washington</p> <p>Seattle</p> <p>Study Area</p> <p>Portland</p> <p>Oregon</p> <p>Pacific Ocean</p>	<p>Figure 2: Aerial Photograph</p> <p>Proposed Tahoma National Cemetery Expansion Tahoma WA</p>
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King County

Water and Land Resources Division

Department of Natural Resources and Parks

King Street Center

201 South Jackson Street, Suite 600
Seattle, WA 98104-3855

206.296.6519 Fax 206.296.0192

TTY Relay: 711

March 3, 2010

Mr. Karl Matthew Rains, Project Professional
Mr. Allen W. Conger, PWS
MACTEC Engineering and Consulting, Inc.
720 Grace Road, Suite 132
Columbia, SC 29210

RE: Tahoma National Cemetery Expansion [environmental Assessment] Request for Information

Dear Gentlemen:

The National Cemetery Administration (NCA) is currently performing a Tiered Environmental Assessment (EA) in accordance of the Veterans Affairs policy for complying with the National Environmental Policy Act. The NCA proposes the development of approximately 15 to 20 acres of the remaining 101 undeveloped (forested) acres at the 159-acre national cemetery. In order to select the 15 to 20 acres to be developed for new burial area, 52 acres across two separate locations will be evaluated in this EA.

The request for information from MACTEC does not include descriptions of the alternatives being evaluated, except to mention that there is a no-action alternative. Not having the action alternatives to review forces a more general response.

I will assume that all County regulations for wetland buffers (Critical Areas Ordinance Section 21A.24.325) will be complied with in developing these forested areas. Further, in terms of retaining wildlife habitat value, I would advise and encourage the new burial areas to be located within or adjacent to areas already cleared. Assuming parking is a consideration, I would emphasize that priority for the new burial areas be given to those locations that already support adequate parking, rather than locations that would require new roads be built.

Mr. Karl Matthew Rains
Mr. Allen W. Conger
March 3, 2010
Page 2

Forested areas supporting native vegetation should be prioritized for retention over areas with a large amount of invasive species. And prior to clearing any forested areas, the areas should be reviewed for the presence of Wildlife Habitat Conservation Areas, as per the King County Critical Areas Ordinance (Section 21A.24.382).

Sincerely,



Jennifer Vanderhoof, Senior Ecologist

cc: Mark Isaacson, Division Director, Water and Land Resources Division, Department of
Natural Resources and Parks (WLRD)
Randy Shuman, Science Section Manager, WLRD



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

March 1, 2010

Ms. Camille Pleasants
THPO Cultural Resources
Colville Confederated Tribes
P.O. Box 150
Nespelem, Washington 99155-0150

Subject: Cultural Resources Assessment for the phased development at the Tahoma National Cemetery, King County, Washington.

Dear Ms. Pleasants:

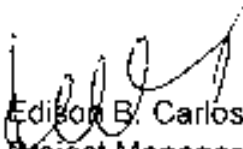
The United States Department of Veterans Affairs (VA), National Cemetery Administration (NCA) plans to develop the next phase of burial areas at the existing Tahoma National Cemetery in Covington, King County, Washington, a property eligible for the National Register of Historic Places. The existing cemetery is located at 18600 SE 240th Street (Figure 1) and approximate coordinates are N47°23'30.92"/W122°05'48.64". Originally opened in 1997, the NCA is projecting gravesite depletion in currently developed areas of the cemetery by approximately 2016. In accordance with the master plan for the entire 159-acre cemetery, the NCA has proposed the development of approximately 15-20 acres of the 101 undeveloped acres remaining at the cemetery site. The project is a federal undertaking subject to Section 106 of the National Historic Preservation Act (NHPA), as amended. The VA has contracted with MACTEC Engineering and Consulting, Inc. (MACTEC) to assist with the environmental documentation for the proposed phased development. MACTEC has subcontracted with AMEC Earth and Environmental, Inc. (AMEC) to conduct a cultural resources assessment of the project area in compliance with Section 106 of the NHPA.

Tahoma National Cemetery is located near the community of Covington, Washington within Section 18 of Township 22 North, Range 6 East, Willamette Meridian. Two areas within the existing boundaries of the cemetery will be studied for the proposed Phase 2 expansion (Figure 2). A total of 52 acres will be included in the evaluation. Approximately 15-20 acres of undeveloped land will be utilized to develop approximately 21,000 gravesites for both casketed and cremated remains. Also included in this project will be the installation of 6,000 pre-placed crypts in sections previously cleared for traditional burials. The

cremated remains. Also included in this project will be the installation of 6,000 pre-placed crypts in sections previously cleared for traditional burials. The additional acreage to be studied includes wetlands and associated buffers, as well as additional undeveloped property that is not currently designated as burial areas. The goal of the cultural resources assessment is to determine if proposed Phase 2 development at the existing cemetery will have any effect on historic properties as defined by NHPA, specifically archaeological resources, traditional cultural properties, and historic buildings/structures. Figure 2 shows the proposed project's Area of Potential Effects (APE).

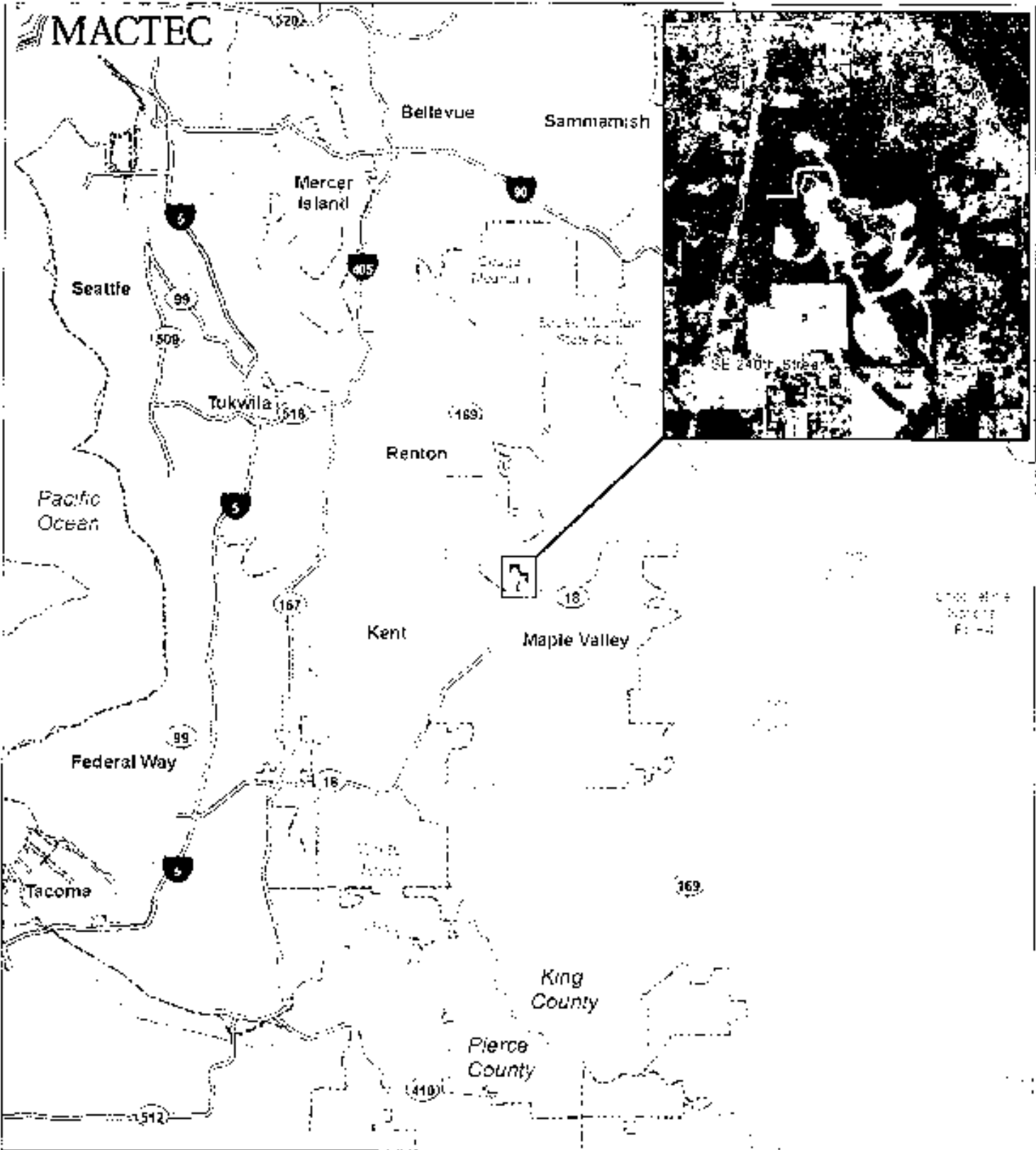
This letter is intended to notify the Colville Confederated Tribes of the proposed action. We invite the Colville Confederated Tribes to identify any cultural concerns about the project and provide any available information you may chose to share about archaeological or traditional cultural properties that may be affected by the project. Should you have any questions about this project, please contact me at (202) 461-8940 or ed.carlos@va.gov.

Sincerely,





Edison B. Carlos, PE
Project Manager
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management

Enclosures: Figure 1: Project Location Map
Figure 2: Aerial Photograph

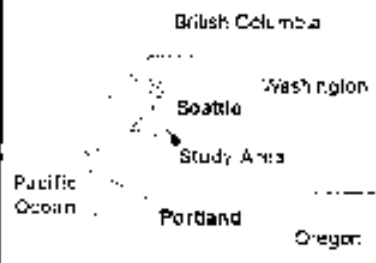


LEGEND

-  National Cemetery Property Boundary
-  Proposed Phase 2 Expansion Area



Created by CGS
 Approved by K/M/H
 February 5, 2010



**Figure 1:
 Project Location Map**

Proposed Tahoma
 National Cemetery Expansion
 Tahoma, WA

Rains, Karl

Subject: FW: Proposed Tahoma National Cemetery Development Project

From: Brandon Reynon [mailto:brandon.reynon@puyalluptribe.com]

Sent: Monday, March 08, 2010 2:25 PM

To: Carlos, Edison (CFM)

Subject: Proposed Tahoma National Cemetery Development Project

Mr. Carlos,

The subject property is located within the Usual and Accustomed area of our people. The term "Usual and Accustomed Areas" comes from the treaties that the tribes in this area signed with the federal government. Tribes reserved the right to hunt, fish and gather in our "usual and accustomed grounds and stations." These U&A areas have been adjudicated by the federal courts. As with all of these areas they are significant areas to our Tribe.

Although, at this time, we are unaware of an actual identified area of concern please recognize that historic sites may be exposed when such projects are undertaken. Any exposure of historical sites will need to be reported to my office immediately.

The comments contained within this letter apply to cultural and historic resources exclusively. The Tribe encourages your agency to contact the Tribe's Natural Resources, Land Use, or other applicable departments and solicit those departments' input on your project. Other Tribal departments may have objections, concerns or input into your proposal above and beyond comments contained within this letter.

Thank you for your letter.

Sincerely,

Brandon Reynon

Tribal Archaeologist/Cultural Regulatory Specialist

Puyallup Tribe of Indians

253.573.7986



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

March 1, 2010

Mr. Brandon Reynon
Cultural Regulatory Specialist
Puyallup Tribe
3009 East Portland Avenue
Tacoma, Washington 98404

Subject: Cultural Resources Assessment for the phased development at the Tahoma National Cemetery, King County, Washington.

Dear Mr. Reynon:

The United States Department of Veterans Affairs (VA), National Cemetery Administration (NCA) plans to develop the next phase of burial areas at the existing Tahoma National Cemetery in Covington, King County, Washington, a property eligible for the National Register of Historic Places. The existing cemetery is located at 18600 SE 240th Street (Figure 1) and approximate coordinates are N47°23'30.92"/W122°05'48.64". Originally opened in 1997, the NCA is projecting gravesite depletion in currently developed areas of the cemetery by approximately 2016. In accordance with the master plan for the entire 159-acre cemetery, the NCA has proposed the development of approximately 15-20 acres of the 101 undeveloped acres remaining at the cemetery site. The project is a federal undertaking subject to Section 106 of the National Historic Preservation Act (NHPA), as amended. The VA has contracted with MACTEC Engineering and Consulting, Inc. (MACTEC) to assist with the environmental documentation for the proposed phased development. MACTEC has subcontracted with AMEC Earth and Environmental, Inc. (AMEC) to conduct a cultural resources assessment of the project area in compliance with Section 106 of the NHPA.

Tahoma National Cemetery is located near the community of Covington, Washington within Section 18 of Township 22 North, Range 6 East, Willamette Meridian. Two areas within the existing boundaries of the cemetery will be studied for the proposed Phase 2 expansion (Figure 2). A total of 52 acres will be included in the evaluation. Approximately 15-20 acres of undeveloped land will be utilized to develop approximately 21,000 gravesites for both casketed and cremated remains. Also included in this project will be the installation of 6,000

pre-placed crypts in sections previously cleared for traditional burials. The additional acreage to be studied includes wetlands and associated buffers, as well as additional undeveloped property that is not currently designated as burial areas. The goal of the cultural resources assessment is to determine if proposed Phase 2 development at the existing cemetery will have any effect on historic properties as defined by NHPA, specifically archaeological resources, traditional cultural properties, and historic buildings/structures. Figure 2 shows the proposed project's Area of Potential Effects (APE).

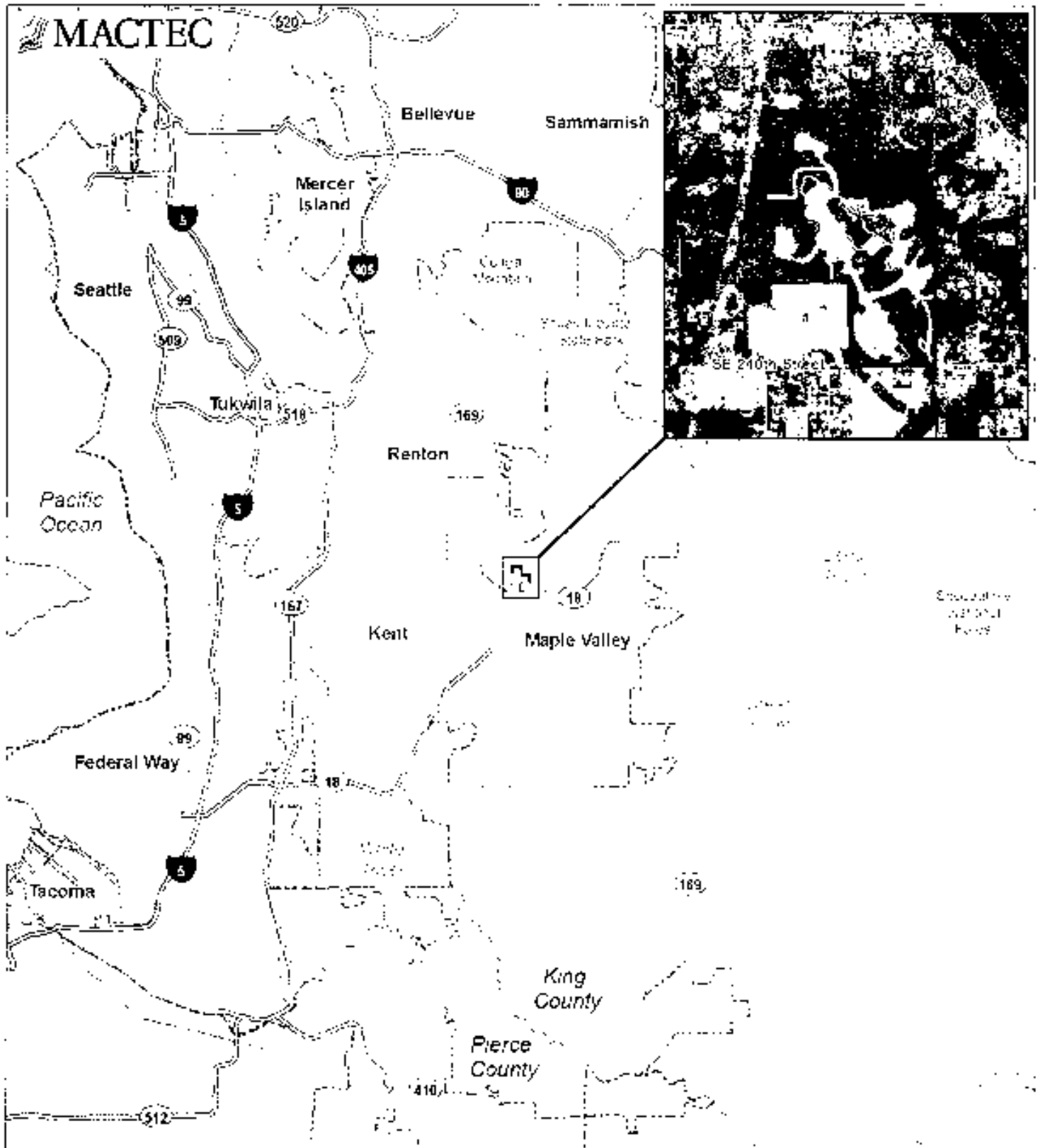
This letter is intended to notify the Puyallup Tribe of the proposed action. We invite the Puyallup Tribe to identify any cultural concerns about the project and provide any available information you may chose to share about archaeological or traditional cultural properties that may be affected by the project. Should you have any questions about this project, please contact me at (202) 461-8940 or ed.carlos@va.gov.

Sincerely,



Edison B. Carlos, PE
Project Manager
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management

Enclosures: **Figure 1: Project Location Map**
Figure 2: Aerial Photograph

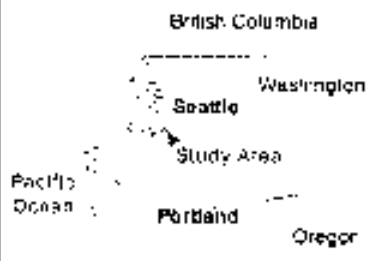


LEGEND

National Cemetery Property Boundary
 Proposed Phase 2 Expansion Area





Created by: GGB
 Approved by: KMR
 February 5, 2010



**Figure 1:
Project Location Map**

Proposed Tacoma
 National Cemetery Expansion
 Tacoma, WA



<p>LEGEND</p> <ul style="list-style-type: none"> --- Intermittent Stream (USGS) Proposed Phase 2 Expansion Area ▭ National Cemetery Property Boundary ▨ Alderwood gravelly sandy loam (NRCS) ▧ NW Wetland (USFWS) 	  <p>Created by: QGS Approved by: KMR February 9, 2010</p>	<p>British Columbia</p> <p>Washington</p> <p>Seattle</p> <p>Study Area</p> <p>Pacific Ocean</p> <p>Portland</p> <p>Oregon</p>	<p>Figure 2: Aerial Photograph</p> <p>Proposed Tahonia National Cemetery Expansion Tahoma WA</p>
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DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington DC 20420

March 1, 2010

Ms. Laura Murphy
Cultural Resources
Muckleshoot Tribe
39015 172nd Avenue SE
Auburn, Washington 98092

Subject: Cultural Resources Assessment for the phased development at the Tahoma National Cemetery, King County, Washington.

Dear Ms. Murphy:

The United States Department of Veterans Affairs (VA), National Cemetery Administration (NCA) plans to develop the next phase of burial areas at the existing Tahoma National Cemetery in Covington, King County, Washington, a property eligible for the National Register of Historic Places. The existing cemetery is located at 18600 SE 240th Street (Figure 1) and approximate coordinates are N47°23'30.92"/W122°05'48.64". Originally opened in 1997, the NCA is projecting gravesite depletion in currently developed areas of the cemetery by approximately 2016. In accordance with the master plan for the entire 159-acre cemetery, the NCA has proposed the development of approximately 15-20 acres of the 101 undeveloped acres remaining at the cemetery site. The project is a federal undertaking subject to Section 106 of the National Historic Preservation Act (NHPA), as amended. The VA has contracted with MACTEC Engineering and Consulting, Inc. (MACTEC) to assist with the environmental documentation for the proposed phased development. MACTEC has subcontracted with AMEC Earth and Environmental, Inc. (AMEC) to conduct a cultural resources assessment of the project area in compliance with Section 106 of the NHPA.

Tahoma National Cemetery is located near the community of Covington, Washington within Section 18 of Township 22 North, Range 6 East, Willamette Meridian. Two areas within the existing boundaries of the cemetery will be

studied for the proposed Phase 2 expansion (Figure 2). A total of 52 acres will be included in the evaluation. Approximately 15-20 acres of undeveloped land will be utilized to develop approximately 21,000 gravesites for both casketed and cremated remains. Also included in this project will be the installation of 6,000 pre-placed crypts in sections previously cleared for traditional burials.

The additional acreage to be studied includes wetlands and associated buffers, as well as additional undeveloped property that is not currently designated as burial areas. The goal of the cultural resources assessment is to determine if proposed Phase 2 development at the existing cemetery will have any effect on historic properties as defined by NHPA, specifically archaeological resources, traditional cultural properties, and historic buildings/structures. Figure 2 shows the proposed project's Area of Potential Effects (APE).

This letter is intended to notify the Muckleshoot Tribe of the proposed action. We invite the Muckleshoot Tribe to identify any cultural concerns about the project and provide any available information you may chose to share about archaeological or traditional cultural properties that may be affected by the project. Should you have any questions about this project, please contact me at (202) 461-8940 or ed.carlos@va.gov.

Sincerely,



Edison B. Carlos, PE

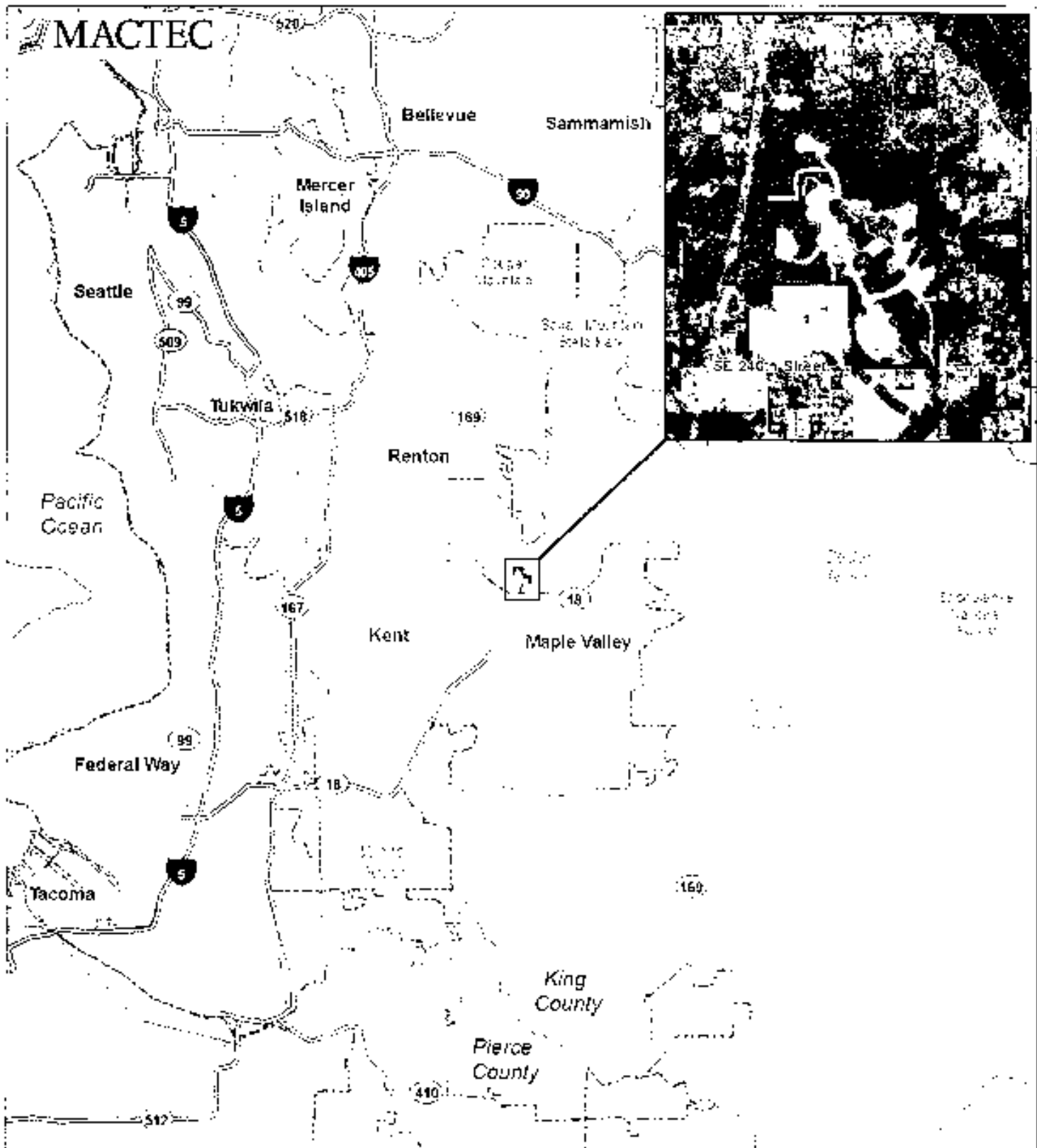
Project Manager

U.S. Department of Veterans Affairs



Office of Construction & Facilities Management

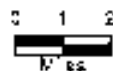
Enclosures: Figure 1: Project Location Map

Figure 2: Aerial Photograph

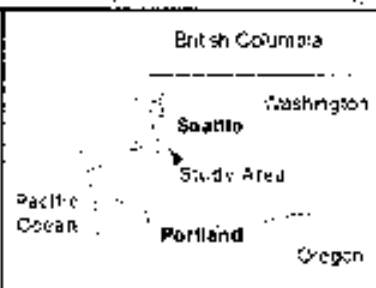


LEGEND

-  National Cemetery Property Boundary
-  Proposed Phase 2 Expansion Area

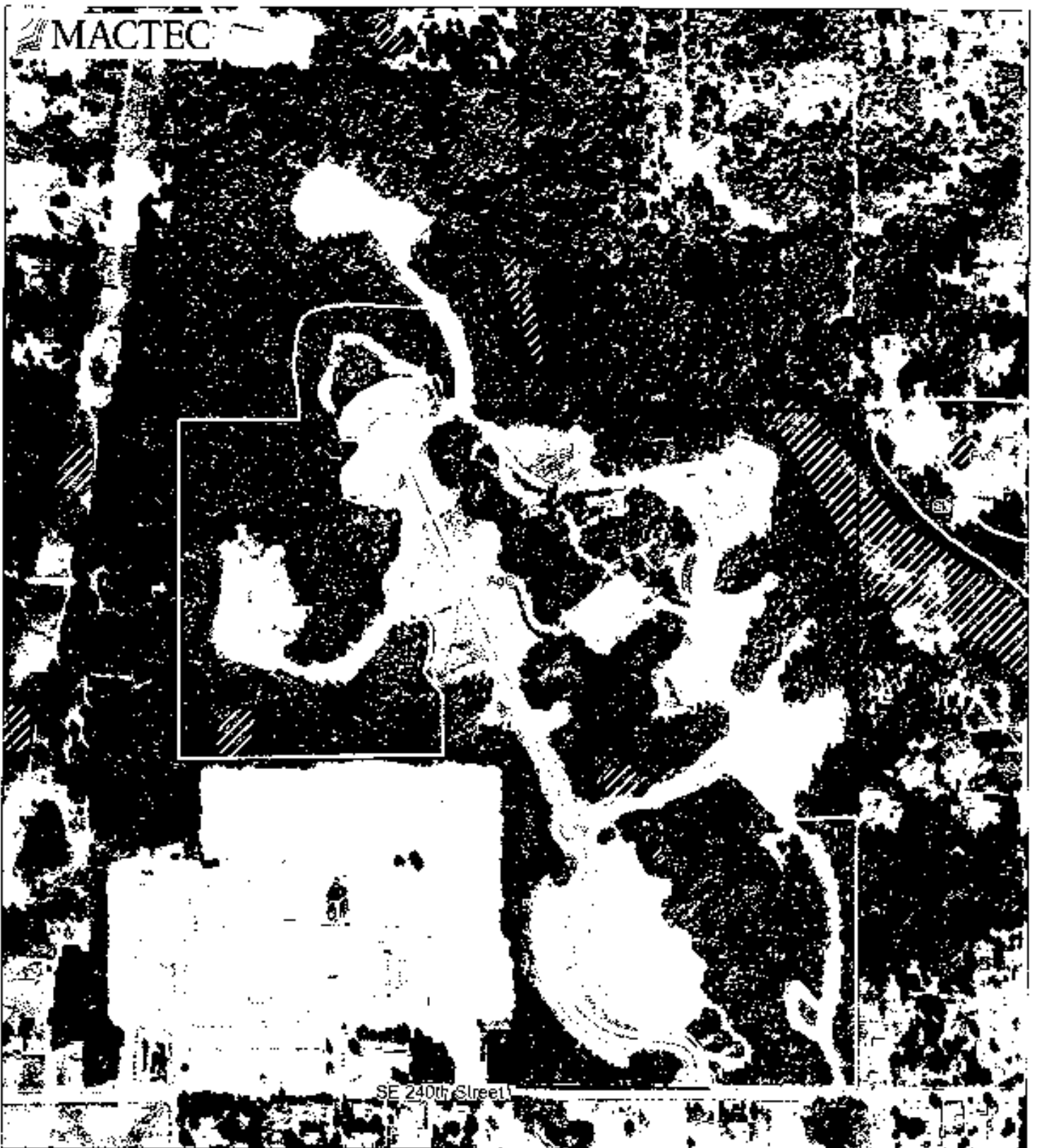


Created by GGS
 Approved by KMR
 February 5, 2010


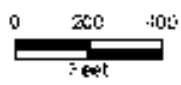


**Figure 1:
 Project Location Map**

Proposed Tahoma
 National Cemetery Expansion
 Tahoma, WA



SE 240th Street

<p>LEGEND</p> <ul style="list-style-type: none"> --- Intermittent Stream (LSCS) --- Proposed Phase 2 Expansion Area ▭ National Cemetery Property Boundary ▨ Alderwood gravelly sandy loam (NRCS) ▧ NWI Wetland (USFWS) <div style="text-align: center;">   <p>0 200 400 Feet</p> </div> <p>Created by CGS Approved by KMR February 5, 2010</p>	<p>British Columbia</p> <p>Washington</p> <p>Seattle</p> <p>Study Area</p> <p>Portland</p> <p>Oregon</p> <p>Pacific Ocean</p>	<p>Figure 2: Aerial Photograph</p> <p>Proposed Tahoma National Cemetery Expansion Tahoma, WA</p>
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DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington DC 20420

March 1, 2010

Ms. Kate Valdez
THPO Cultural Resources
Yakama Nation
P.O. Box 151
Toppenish, Washington 98948

Subject: Cultural Resources Assessment for the phased development at the Tahoma National Cemetery, King County, Washington.

Dear Ms. Valdez:

The United States Department of Veterans Affairs (VA), National Cemetery Administration (NCA) plans to develop the next phase of burial areas at the existing Tahoma National Cemetery in Covington, King County, Washington, a property eligible for the National Register of Historic Places. The existing cemetery is located at 18600 SE 240th Street (Figure 1) and approximate coordinates are N47°23'30.92"/W122°05'48.64". Originally opened in 1997, the NCA is projecting gravesite depletion in currently developed areas of the cemetery by approximately 2016. In accordance with the master plan for the entire 159-acre cemetery, the NCA has proposed the development of approximately 15-20 acres of the 101 undeveloped acres remaining at the cemetery site. The project is a federal undertaking subject to Section 106 of the National Historic Preservation Act (NHPA), as amended. The VA has contracted with MACTEC Engineering and Consulting, Inc. (MACTEC) to assist with the environmental documentation for the proposed phased development. MACTEC has subcontracted with AMEC Earth and Environmental, Inc. (AMEC) to conduct a cultural resources assessment of the project area in compliance with Section 106 of the NHPA.

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additional acreage to be studied includes wetlands and associated buffers, as well as additional undeveloped property that is not currently designated as burial areas. The goal of the cultural resources assessment is to determine if proposed Phase 2 development at the existing cemetery will have any effect on historic properties as defined by NHPA, specifically archaeological resources, traditional cultural properties, and historic buildings/structures. Figure 2 shows the proposed project's Area of Potential Effects (APE).

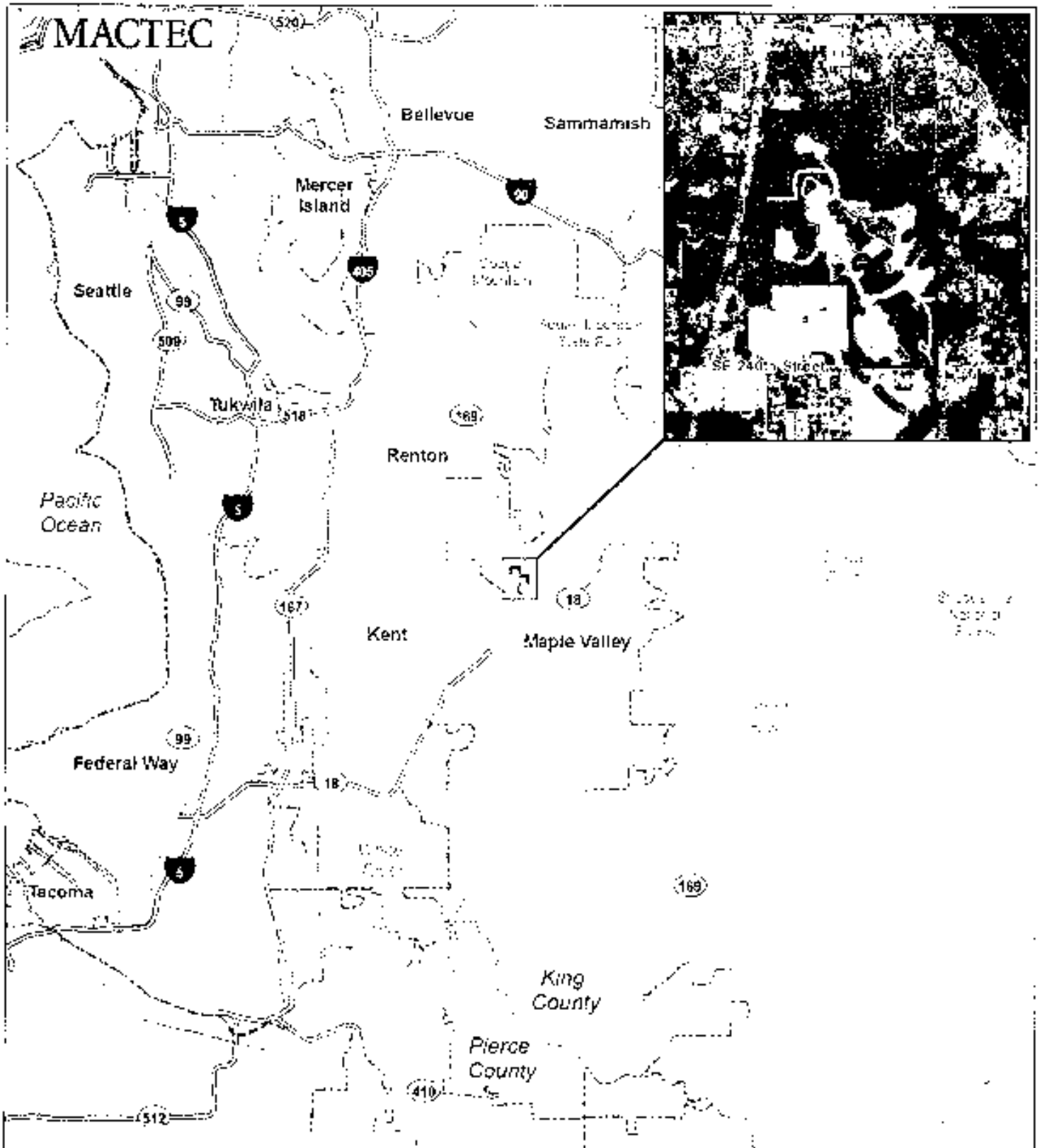
This letter is intended to notify the Yakama Nation of the proposed action. We invite the Yakama Nation to identify any cultural concerns about the project and provide any available information you may chose to share about archaeological or traditional cultural properties that may be affected by the project. Should you have any questions about this project, please contact me at (202) 461-8940 or ed.carlos@va.gov.

Sincerely,





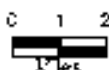
Edison B. Carlos, PE
Project Manager
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management

Enclosures: Figure 1: Project Location Map
Figure 2: Aerial Photograph

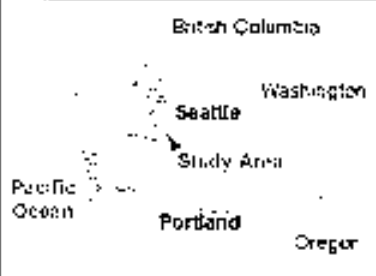


LEGEND

-  National Cemetery Property Boundary
-  Proposed Phase 2 Expansion Area




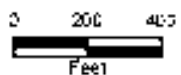
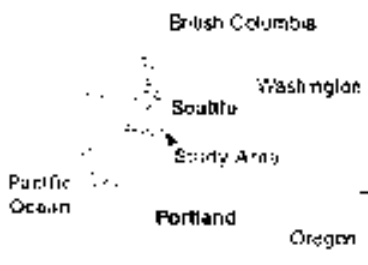
Created by: CGS
 Approved by: KNR
 February 5, 2010



**Figure 1:
 Project Location Map**

Proposed Tahoma
 National Cemetery Expansion
 Tahoma, WA



<p>LEGEND</p> <ul style="list-style-type: none"> — Intermittent Stream (USGS) Proposed Phase 2 Expansion Area ▭ National Cemetery Property Boundary Alderwood gravelly sandy loam (NRCS) NWI Wetland (USFWS) 	  <p>Created by CGS Approved by KMR February 6, 2010</p>		<p>Figure 2: Aerial Photograph</p> <p>Proposed Taharna National Cemetery Expansion Taharna, WA</p>
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United States
Department of
Agriculture

Forest
Service

Pacific
Northwest
Region

333 SW First Avenue (97204)
PO Box 3623
Portland, OR 97208-3623
503-808-2468

File Code: 1950

Date: February 24, 2010

Mr. Karl Matthew Rains
Project Professional
Mactec Engineering and Consulting, Inc
720 Gracem Road, Suite 132
Columbia, SC 29210

Dear Mr. Rains:

Thank you for the opportunity to comment on the Department of Veterans Affairs proposed expansion of the Tahoma National Cemetery. We have reviewed the proposal as submitted in your letter of February 5, 2010, and have not identified any adverse or beneficial effects to National Forests or National Forest resources in the Pacific Northwest.

Sincerely,


MARY WAGNER
Regional Forester

cc: Philip J Mattson



Rains, Karl

From: DRISKILL, DAVID (DNR) [David.Driskill@dnr.wa.gov]
Sent: Thursday, February 18, 2010 6:24 PM
To: Rains, Karl
Subject: Tahoma National Cemetery
Attachments: TNC.pdf

Karl –

Here's the deed. There's nothing on the deed setting out covenants or restrictions. I've ordered the file back from storage just to double check.

<<TNC.pdf>>

Dave Driskill

Assistant Division Manager

Washington State Department of Natural Resources (DNR)

Title & Records Office Manager

Engineering Division Data Steward

Direct Line: 360.902.1611

Fax: 360.902.1791

Email: david.driskill@dnr.wa.gov

www.dnr.gov

 Please consider the environment before printing this e-mail. Thank you.

QUITCLAIM DEED

THE GRANTOR, STATE OF WASHINGTON, acting by and through the Department of Natural Resources for and in consideration of the sum of ONE MILLION, SIX HUNDRED EIGHTEEN THOUSAND DOLLARS AND NO ONE HUNDREDTHS (\$1,618,000.00), hereby grants, conveys and quitclaims to UNITED STATES OF AMERICA AND ITS ASSIGNS, GRANTEE, all of its right, title, and interest in, and to, the following described real property situated in King County, Washington, to wit:

The E $\frac{1}{2}$ SW $\frac{1}{4}$ together with Government Lots 2 and 3, all in Section 18, Township 22 North, Range 6 East, Willamette Meridian, containing 158.29 acres, more or less, more particularly described as follows:

Beginning at the south quarter corner of Section 18, Township 22 North, Range 6 East, W.M. and proceeding thence North 88° 35' 41" West 1306.35 feet along the centerline of Southeast 240th Street; thence North 01° 48' 25" East 1312.12 feet along the west line of the E $\frac{1}{2}$ SW $\frac{1}{4}$ of said Section 18; thence North 88° 48' 40" West 1317.50 feet along the south line of Government Lot 3 of said Section 18; thence North 01° 45' 00" East 1307.14 feet along the west line of said Government Lot 3 to the west quarter corner of said Section 18; thence North 00° 28' 05" East 1320.30 feet along the west line of Government Lot 2 of said Section 18; thence South 88° 59' 35" East 1335.08 feet along the north line of said Government Lot 2; thence South 01° 10' 19" West 1319.43 feet along the east line of said Government Lot 2; thence South 89° 01' 43" East 1293.32 feet along the east-west centerline of said Section 18; thence South 01° 31' 17" West 2634.02 feet along the north-south centerline (east line of the E $\frac{1}{2}$ SW $\frac{1}{4}$) of said Section 18, to the True Point of Beginning.

Together with all right, title, and interest of the Grantor in and to any alleys, streets, ways, strips, or gores, abutting or adjoining the land.

The acquiring agency is the Department of Veteran Affairs.

This Deed is executed and delivered pursuant to RCW 79.01.220 at the request of the Commissioner of Public Lands with the approval of the Board of Natural Resources, State of Washington.

WITNESS the Seal of the State of Washington, affixed this 11TH day of NOVEMBER, 1993.

FILED FOR RECORD AT REQUEST OF
TRANSAMERICA TITLE INSURANCE CO.
330 10TH AVE. NE
P.O. BOX 1403
BELLEVUE, WA 98003

Mike J. ...
GOVERNOR
Attest: *[Signature]*
SECRETARY OF STATE

Approved as to form this 6
day of Oct 1993
James Schwest
Assistant Attorney General

Deed No. 26453

State Record of Deeds, Volume 13, Page 165
App. No. 52858



9311181501

8602237 / 66063700

Vertical text on the right margin, possibly a recording or filing number.



Natural Resources Conservation Service
1011 East Main, Suite 105
Puyallup, WA 98372
(253) 845-9272. Fax (253) 445-9934

February 11, 2010

Karl Mathew Rains
MACTEC Engineering and Consulting, Inc.
720 Grace Road, Suite 132
Columbia, SC 29210

Subject: Tahoma National Cemetery Expansion
MACTEC Project 6671-09 0695

Dear Mr. Rains:

As requested in your letter dated February 5, 2010 and our phone conversations, since no new land is being acquired for the cemetery and the area of expansion is within the existing boundaries of the cemetery, the USDA-NRCS would consider the mapped soils as "land already in or committed to urban development". Land committed to urban development does not meet the definition of important farmland (prime, unique, statewide importance) or prime forestland.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles Natsuhara".

Charles Natsuhara
Area Resource Soil Scientist

Rains, Karl

From: Plummer, Peg (ECY) [pplu461@ECY.WA.GOV]
Sent: Wednesday, February 10, 2010 1:13 PM
To: Rains, Karl
Subject: EA for National Cemetery Expansion, Kent WA

Hello, Mr. Rains,

Thank you for taking my call and explaining exactly what your correspondence was about. As per our conversation, I am emailing my Mailing Address to send me the EA when it is released so I may include it in the SEPA/NEPA Register that is published here in the State of WA.

I will need 2 copies; one can be a CD and the other will have to be a hard copy. Please mail it to:

WA State Dept of Ecology
Environmental Review Section, SEPA
PO Box 47703
Olympia, WA 98504-7703

Thank you,

Peg Plummer

Dept of Ecology
SEPA Unit
PO Box 47703
Olympia WA 98504-7703 pplu461@ecy.wa.gov
360-407-6924 – phone
360-407-6904 – fax

Need information about the State Environmental Policy Act (SEPA)? Visit the SEPA website at <http://www.ecy.wa.gov/programs/sei/sepa/e-review.html>

SEPAUNIT@ecy.wa.gov - Use this address to Submit Electronic SEPA Documents to the SEPA Register ONLY.
sepahelp@ecy.wa.gov (Please use this email address for all general SEPA questions)

FAX TRANSMISSION

To:
From:
Subject: Tiered Environmental Assessment - Request for Information
Date: Friday, February 05, 2010

Message: Mr. Rains,

We are in receipt of your letter regarding a Tiered Environmental Assessment (attached). Unfortunately, there is not anyone within our organization available to comment. However we do ask you to forward the information to both the Puyallup and Muckleshoot Tribes. Should you have any questions, you can reach Fran Wilshusen at 360.438.1180 or by email at fwilshu@nwifc.org.

Puyallup Tribe
3009 East Portland Avenue
Tacoma, WA 98404

Muckleshoot Tribe
39015 172nd Avenue SE
Auburn, WA 98092

Thank you for your help with this matter.

*SARAH JONES
SECRETARY II/RECEPTIONIST
NORTHWEST INDIAN FISHERIES COMMISSION
6730 MARTIN WAY E
OLYMPIA, WA 98516
PHONE: 360.438.1180
FAX: 360.753.8659*



Northwest Indian Fisheries Commission
6730 Martin Way E | Olympia, WA 98516
Tel: (360) 438-1180 | Fax: (360) 753-8559
www.nwifc.org

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February 5, 2010

«First_Name»

«Company»

«Address»

«State_City_Zip»

**Subject: Tiered Environmental Assessment – Request for Information
Proposed Department of Veterans Affairs, National Cemetery Expansion
Kent, King County, Washington
MACTEC Project 6671-09-0695**

Dear Sir or Madam:

MACTEC Engineering and Consulting, Inc. (MACTEC) has been retained by the Department of Veterans Affairs (VA), National Cemetery Administration (NCA) to provide environmental services for the above-identified proposed National Cemetery expansion. The NCA is currently performing a Tiered Environmental Assessment (EA), in accordance with VA policy for compliance with the National Environmental Policy Act (NEPA). In order that potential environmental effects of the project may be fully evaluated and considered, the VA is hereby requesting that you respond in writing concerning any beneficial or adverse impacts relative to the interests of your agency. The project vicinity is provided on Figure 1.

The Tahoma National Cemetery, currently the only national cemetery in Washington State, is located approximately 20 miles southeast of Seattle and approximately 20 miles northeast of Tacoma. It is located in King County and approximate coordinates are N47°23'30.92"/W122°05'48.64". Originally opened in 1997, the NCA is projecting gravesite depletion in currently developed areas of the cemetery by approximately 2016. In accordance with the master plan for the entire 159-acre cemetery, the NCA proposes the development of approximately 15 to 20 acres of the 101 undeveloped acres remaining at the cemetery site. The proposed expansion primarily consists of the development of two new burial areas to provide approximately 21,000 gravesites for both casketed and cremated remains.

The purpose of this project is to enable the existing national cemetery to continue to provide burial services for eligible veterans in the Puget Sound area of Washington State. The proposed development will provide an additional 10 years of continued burial service to an estimated veteran population of approximately 390,000 who are served by the Tahoma National Cemetery. The Tiered EA approach is recommended for this project since the VA already owns the property proposed for development, the cemetery is currently in operation, and given that an Environmental Impact Statement (EIS) was completed in 1991 during the selection process of this site to serve as a National Cemetery for veterans in this area. The Tiered EA is being prepared to evaluate environmental criteria at the proposed expansion areas that may have changed since the completion of the 1991 EIS.

Two areas within the existing boundaries of the cemetery will be studied for the proposed Phase 2 expansion (Figure 2). A total of 52 acres will be included in this evaluation. The additional acreage

to be studied includes wetlands and associated buffers, as well as additional undeveloped property that are not currently designated as burial areas. The expansion areas are located in the southeastern corner of the property and the central-western portion of the property. In addition to the proposed burial areas, the project will also include associated infrastructure (roadways, irrigation, etc.) and landscaping, as well as the addition of several memorial walls, a Scattering Garden/Ossuary, and renovations to cemetery signage and site furnishings.

The existing cemetery ranges from approximately 475 feet to 525 feet in elevation. The underlying topography is relatively level terrain, with a northwest-southeast drainage transecting the northeastern portion of the cemetery. No streams were identified within the boundaries of the proposed expansion areas, although numerous isolated wetlands have been previously identified in these areas during a 1994 wetland delineation. The cemetery is located within the Green/Duwamish River Watershed of the Central Puget Sound Watershed. This portion of the Green/Duwamish River watershed is within the Puget Lowland level III ecoregion (USEPA, 2007) and the Eastern Puget Riverine Lowlands level IV ecoregion (USEPA, 2007). Soils at the cemetery and proposed expansion areas consist of Alderwood gravelly sandy loam. These moderately well drained soils are found on moraines and till plains. Slopes at the proposed expansion areas range from 6 to 15 percent.

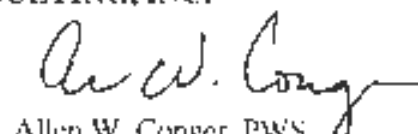
The proposed expansion areas predominately consist of undeveloped woodlands, with the exception of a previously cleared, grassy field in the southeastern expansion area and a cleared area in the central western expansion area currently used as a spoils area for excess soils being generated at a Phase I burial area. The vegetation in the undeveloped portions of the proposed expansion areas primarily consists of mixed forest. Dominant canopy species within the forested area include bigleaf maple, red alder, douglas fir, western red cedar, and vine maple. Understory species include sword fern, bracken fern, native and non-native blackberries, salmon berry, and salal. The areas surrounding the Tahoma National Cemetery primarily consist of undeveloped woodlands and low-density residential properties, with Tahoma High School immediately to the southwest of the cemetery.

A no-action alternative is also considered for the project. However, under this alternative the NCA would not develop new burial areas within the existing national cemetery and the approximate 390,000 veterans residing in the Puget Sound area of Washington State would be unable to use existing facilities, which do not currently have the total capacity to meet the projected needs for this area.

In accordance with NEPA requirements, the VA is soliciting your comments and invites you to review the project. We respectfully request that this project be considered as soon as possible. If you have any questions, please do not hesitate to contact the undersigned at (803) 798-1200. Thank you for your attention to this matter.

Sincerely,
MACTEC ENGINEERING AND CONSULTING, INC.


Karl Matthew Rains
Project Professional


Allen W. Conger, PWS
Senior Principal Scientist

Attachments: **Figure 1: Project Location Map**
 Figure 2: Aerial Photograph

cc: U.S. Environmental Protection Agency -- Region 10
 U.S. Environmental Protection Agency -- Office of Environmental Assessment
 U.S. Fish & Wildlife Service -- Western Washington Field Office, Pacific Region (1)
 U.S. National Park Service -- Pacific West Regional Office
 U.S. Geologic Survey -- Washington Water Science Center
 U.S. Army Corps of Engineers -- Seattle District Office
 U.S. Department of Agriculture -- Forest Service, Pacific Northwest Region (6)
 U.S. Department of Agriculture -- NRCS
 National Oceanic and Atmospheric Administration/National Marine Fisheries Service Northwest
 Regional Office

Washington State Department of Agriculture
Washington State Conservation Commission
Washington State Department of Ecology
Washington State Department of Fish & Wildlife -- Region 4: North Puget Sound
Washington State Department of Natural Resources
Northwest Indian Fisheries Commission

King County Department of Development & Environmental Services
King County Department of Natural Resources & Parks



LEGEND

- National Cemetery Property Boundary
- Proposed Phase 2 Expansion Area



Created by: CGS
 Approved by: KMR
 February 5, 2010



**Figure 1:
 Project Location Map**

Proposed Tahoma
 National Cemetery Expansion
 Tahoma, WA



LEGEND

- Intermittent Stream (USGS)
- Proposed Phase 2 Expansion Area
- National Cemetery Property Boundary
- Alluvial soil (NRCS)
- Wetland (USFWS)



Created by CGS
 Approved by KMR
 February 5, 2010



Figure 2: Aerial Photograph

Proposed Tahoma
 National Cemetery Expansion
 Tahoma, WA

APPENDIX C

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

FINDING OF NO SIGNIFICANT IMPACT
(FONSI)

U.S. DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT

TAHOMA NATIONAL CEMETERY
18600 SE 240TH STREET
KENT, WASHINGTON 98042

PHASED DEVELOPMENT

Introduction and Project Description

The U. S. Department of Veterans Affairs (VA) assessed the potential environmental impacts related to the phased development of approximately 15 to 20 acres of land within the existing boundaries of the Tahoma National Cemetery, in general accordance with the Master Plan for the entire 159-acre cemetery which originally opened in 1997. The proposed expansion primarily consists of the development of two new burial areas to provide approximately 21,000 gravesites for both casketed and cremated remains.

A Tiered Environmental Assessment (EA) was prepared in accordance with the regulations set forth by the Council on Environmental Quality (40 CFR 1500-1508) for implementing the provisions of the National Environmental Policy Act (NEPA), as well as VA guidance for implementing NEPA (Environmental Effects of VA Actions [38 CFR Part 26]). Based on the Tiered EA, the proposed phased development of burial areas for the continued operation of the cemetery resulted in a finding that no significant impacts would occur. The Tiered EA is incorporated into this Finding of No Significant Impact (FONSI) by reference. An Environmental Impact Statement (EIS) is not required.

The VA National Cemetery Administration (NCA) operates the Tahoma National Cemetery, located in Kent, Washington. The NCA is projecting gravesite depletion in currently developed areas of the cemetery by 2016. The 15 to 20 acres of property proposed for the Phase 2 development is located within the boundaries of the existing cemetery. The areas surrounding the Tahoma National Cemetery primarily consist of undeveloped woodlands and low-density residential properties, with Tahoma High School located immediately to the southwest of the cemetery.

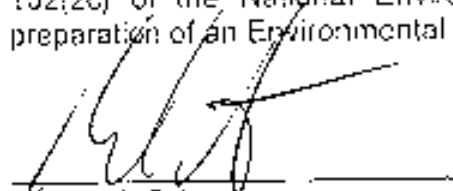
The Tiered EA approach was recommended for this project since the VA already owns the property proposed for development, the cemetery is currently in operation, and given that an EIS was completed in 1991 during the selection process for this site to serve as a National Cemetery for veterans in this area. The Tiered EA was prepared to evaluate environmental criteria at the proposed development areas, within the existing cemetery boundaries, that may have changed since the completion of the 1991 EIS.

Public Involvement

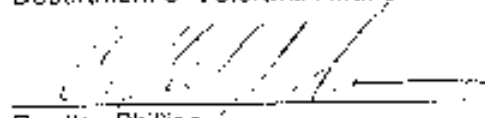
A Notice of Availability for the Draft Tiered Environmental Assessment for Phased Development at the Tahoma National Cemetery was published on September 23, 2011, in the Kent Reporter. Copies of the documents were available at the Tahoma National Cemetery and the Kent Branch of the King County Library System. A copy was also published on the following public web site: <http://www.cem.va.gov/wm/EA.asp>. No comments were received concerning the proposed action.

FINDING OF NO SIGNIFICANT IMPACT:

After reviewing the Tiered Environmental Assessment for the phased development of land at the existing Tahoma National Cemetery, which is incorporated herein, the implementation of the proposed action as described would not constitute a major federal action that would have significant impact upon the quality of the human environment within the meaning of Section 102(2c) of the National Environmental Policy Act (NEPA) of 1969. Accordingly, the preparation of an Environmental Impact Statement is not required.


Richard A. Peterson
Director, National Region
Office of Construction & Facilities Management
Department of Veterans Affairs

11/8/11
Date


Bradley Phillips
Director, Memorial Service Network MSN V
National Cemetery Administration
Department of Veterans Affairs

11/8/11
Date

CONTACT INFORMATION AND ENVIRONMENTAL ASSESSMENT LOCATIONS

1. Tahoma National Cemetery
James Trumbo, Cemetery Director
18600 SE 240th Street
Kent, Washington 98042
(425)-413-9614
Email: james.trumbo@cem.va.gov

2. Robert Klipfel
Project Manager
Department of Veterans Affairs
Office of Construction & Facilities Management
425 Eyc Street, NW
Washington, DC 20001
Email: Robert.Klipfel@va.gov