

**Appendix B**  
**Agency Correspondence**

Inter-Agency Consultation -- Salisbury National Cemetery Gravesite Expansion

<b>Agency / Organization</b>	<b>Contact</b>		<b>Position</b>	<b>Comments</b>
<b>Local</b>				
Rowan County	Aaron	Church	County Manager	no response
City of Salisbury	Lane	Bailey	City Manager	floodplain, historic, and buried sewer lines
Rowan County Conservation District	Jim	Summers	Supervisor	no response
<b>State</b>				
North Carolina Department of Environmental Quality	Sam	Hayes	General Counsel	erosion and sediment control plan
North Carolina Department of Agriculture and Consumer Services	Patricia	Harris	Director	no response
North Carolina Wildlife Resources Commission	Rupert	Medford	District 6 Wildlife Biologist	biol resources, wetlands, stream buffers
North Carolina State Historic Preservation Office	CH2M will contact			
North Carolina Division of Environmental Assistance and Customer Service	Marcia	Allocco	Environmental Assistance Coordinator	no response
North Carolina Public Health Environmental Health Section	Larry	Michael	Section Chief	no response
North Carolina Forest Service	Don	Watson	District 3 Forester	no response
<b>Federal</b>				
U.S. Army Corps of Engineers, Wilmington District	John	Thomas	Rowan County Contact	404 permitting
U.S. Fish & Wildlife Service, Southeast Region Ecological Services Field Office	Pete	Benjamin	Field Supervisor	Sec 7 consultation fulfilled
Natural Resources Conservation Service	Kristin	May	Rowan County NRCS Scientist	urban, FPPA exempt



Office of the  
City Manager

## *City of Salisbury* North Carolina

December 17, 2015

Carol Lee-Roark, PhD, PG  
Senior Environmental Scientist  
Sanderson Stewart  
106 East Babcock  
Bozeman, MT 59715

Regarding: Salisbury National Cemetery, Salisbury, North Carolina  
Department of Veterans Affairs National Cemetery Administration Project 876-021  
Gravesite Expansion

Dear Ms. Lee-Roark:

Thank you for the opportunity to comment on the proposed gravesite expansion project at the Salisbury National Cemetery in Salisbury, North Carolina. I have reviewed this proposal with other City departments for your consideration as part of your NEPA review.

The areas of proposed expansion, as mapped in Figure 2 of your letter, indicate two areas of expansion. There are no wetlands within your project area. However, these areas are both located within the 100-year flood plain of Grants Creek and are close to the edge of the Grants Creek floodway. Prior to the commencement of construction, Bryan Alston, the City's Floodplain Administrator, should be contacted. Bryan Alston can be reached either by phone at (704) 638-2176, or by email at [balst@salisburync.gov](mailto:balst@salisburync.gov).

The larger project area to the south is bordered by several 10" vitreous clay sewer lines. Prior to the commencement of ground disturbing activity, Jason Wilson, Engineering Manager with Salisbury-Rowan Utilities, should be contacted. Jason Wilson can be reached either by phone at (704) 216-7553 or by email at [jawils@salisburync.gov](mailto:jawils@salisburync.gov).

Though beyond the scope of your NEPA review, this area is located within an area identified in a 2001 architectural survey as a potential historic district. However, no further action has been taken on the proposed Veterans Administration Hospital District and it is not listed on any historic registers, local or federal.

Ms. Carol Lee-Roark, PhD, PG  
December 17, 2015  
Page 2

A map indicating the limits of the floodway, 100 year floodplain, and pertinent sewer lines is enclosed. If you have any additional questions, please do not hesitate to contact me or the appropriate city staff as detailed above. Thank you for the opportunity to review and comment on the gravesite expansion project at the Salisbury National Cemetery.

Sincerely,



W. Lane Bailey  
City Manager

Enclosures

cc: Bryan Alston  
Jason Wilson  
File

Department of Veterans Affairs National Cemetery Administration Project 876-021 Gravesite Expansion



**Legend**

**Sewer Utility Lines**

- Rowan County Utility Easements
- Public
- Private
- 8; 10; 12
- 15" and larger
- Rowan County Streams

**NC Flood Hazard**

**FLOOD HAZARDS - ZONE AE**

- AE, FLOODWAY
- AE, 100 YEAR
- AE, 500 YEAR
- DOT Rowan Railroads
- Salisbury Parcels

0 362.5 725 Feet

## Carol Lee-Roark

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**From:** Rodgers, Ashley <ashley.rodgers@ncdenr.gov>  
**Sent:** Wednesday, December 02, 2015 11:56 AM  
**To:** Carol Lee-Roark  
**Cc:** Davis, Tracy; Vinson, Toby; Reeder, Tom; Hayes, Sam M; Khan, Zahid; Bennett, Bradley  
**Subject:** Salisbury National Cemetery - Question re: Permitting

Dr. Lee-Roark,

This email is in response to your inquiry regarding the permitting requirements for the intended expansion of the Salisbury National Cemetery. Any land disturbing activities affecting an acre or more (including this proposed activity) will require an erosion and sedimentation control plan to be approved. The E&SC plan for this site should be submitted to our Mooresville Regional Office for review.

**Mooresville Regional Office**

Address: 610 East Center Ave., Mooresville, NC 28115

Voice: 704.663.1699

Facsimile: 704.663.6040

Regional Engineer: [Zahid Khan](#)

Basic E&SC plan requirements may be found on our website: <http://portal.ncdenr.org/web/lr/erosion> . On this page you will also find our Financial Responsibility/Ownership Form and a Plan Checklist for Designers. The review and processing fee for this plan is \$65/acre or part thereof. Our statutory review time for plans is 30 days; however, we do offer an express review program if an expedited review is needed. There is an additional fee for express review of \$250/acre or part thereof, with a cap of \$2,000 for an express review fee. (There is no cap on the regular \$65/acre review fee.) Any express review process would need to be coordinated with Tamera Eplin of our Mooresville Regional Office and the timeframe for review would be negotiated, but is typically 3-5 days from receipt of a complete plan.

Along with your E&SC plan review, we will also review your plan for compliance with the NCG01 General Construction Stormwater Permit. There is no additional paperwork or fee needed for this review.

Please contact either Zahid Khan (copied on this email) or me if you have any questions regarding E&SC plan submittal or review.

In addition, you may want to contact the City of Salisbury Stormwater staff regarding any post-construction stormwater requirements for this project. The Stormwater Engineer for the City is Chris Tester (704-216-7554) and his email is [ctest@salisburync.gov](mailto:ctest@salisburync.gov).

Thanks,

**Ashley Rodgers, PE**

State Sedimentation Specialist

NCDEQ - Division of Energy, Mineral, and Land Resources

(919) 707-9220 Main Office

[ashley.rodgers@ncdenr.gov](mailto:ashley.rodgers@ncdenr.gov)

1612 Mail Service Center

Raleigh, NC 27699-1612



E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.



## ◊ North Carolina Wildlife Resources Commission ◊

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Gordon Myers, Executive Director

10 December 2015

Carol Lee-Roark  
Sanderson Stewart  
106 East Babcock  
Bozeman, MT 59715

**Subject:** Salisbury National Cemetery Grave Site Expansion, Department of Veteran Affairs National Cemetery Administration, Project No. 876-021, Rowan County, North Carolina.

Dear Ms. Lee-Roark:

Biologists with the North Carolina Wildlife Resources Commission (NCWRC) have reviewed the subject document and we are familiar with the habitat values of the area. Our comments are provided in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661-667e), and North Carolina General Statutes (G.S. 113-131 et seq.).

The proposed project includes gravesite expansion for the existing Salisbury National Cemetery. The purpose of the project is to increase burial options in areas with an unserved or underserved Veteran population, and to meet the need for interment capacity within the next decade.

An unnamed tributary to Grants Creek in the Yadkin-Pee Dee River basin flows through the site, and Grants Creek flows adjacent to the proposed gravesite expansion area. There are records for the state special concern mole salamander (*Ambystoma talpoideum*) near the site. In addition, the U.S. Fish and Wildlife Service recently listed the Northern long-eared bat (*Myotis septentrionalis*) as threatened under the Endangered Species Act. The Northern long-eared bat may be present within or in the vicinity of the project site. Therefore, the project may impact this species and consultation with the U.S. Fish and Wildlife Service may be required. For more information, please see <http://www.fws.gov/midwest/endangered/mammals/nleb/Interim4dRuleKeyNLEB.html> or contact the U.S. Fish and Wildlife Service at (828) 258-3939 to ensure that any issues related to this species are addressed.

The environmental document should include a detailed assessment of existing natural resources within the project area and should discuss the potential of mitigating impacts to wetlands, waters, and high quality upland habitat. We encourage the applicant to consult the Department of Environment and Natural Resources' *Guidance for Preparing SEPA Documents and Addressing Secondary and Cumulative Impacts* in preparing the environmental document. This document is available at <http://portal.ncdenr.org/web/deao/sepa>. To facilitate our review of proposed project impacts on aquatic and terrestrial wildlife resources, we request the following information is included in the environmental

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**Mailing Address:** Division of Inland Fisheries • 1721 Mail Service Center • Raleigh, NC 27699-1721  
**Telephone:** (919) 707-0220 • **Fax:** (919) 707-0028

10 December 2015  
Salisbury National Cemetery

document. Although some of the information, requests and comments may not be applicable to this project, these should facilitate preparation of an environmental document that addresses impacts to aquatic and terrestrial wildlife resources.

1. Include descriptions of aquatic and terrestrial wildlife resources within the project area, and a listing of federally or state designated threatened, endangered or special concern species. A listing of designated species can be found on the N.C. Natural Heritage Program's website at <http://www.ncnhp.org>.
2. Any surveys should be conducted by biologists with both state and federal endangered species permits.
3. Include descriptions of any streams or wetlands affected by the project.
4. Include project maps identifying wetland areas. Identification of wetlands may be accomplished through coordination with the U.S. Army Corps of Engineers (USACE). If the USACE is not consulted, the person delineating wetlands should be identified and criteria listed.
5. Provide information on existing, planned, and projected sewer and water infrastructure service throughout the service area. A map showing the location of the existing and projected lines and areas containing special resources should be included.
6. Define the service area for the project, including any ETJs (extra-territorial jurisdiction), and provide a map of the service area.
7. Provide a description of project activities that will occur within wetlands, such as fill or channel alteration. Acreage of wetlands impacted by alternative project designs should be listed.
8. Provide a description and a cover type map showing acreage of upland wildlife habitat impacted by the project.
9. Discuss the extent to which the project will result in loss, degradation or fragmentation of wildlife habitat (wetlands and uplands).
10. Discuss any measures proposed to avoid or reduce impacts of the project or to mitigate unavoidable habitat losses.
11. Discuss the cumulative impacts of secondary development facilitated by the proposed project. Such discussion should weigh the economic benefits of such growth against the costs of associated environmental impact.
  - (a) Include specific measures (e.g., local ordinances) that will be used to address stormwater and sedimentation at the source. Include specific requirements for both residential and industrial developments and Best Management Practices (BMPs) that will be required.
  - (b) Include specific measures (e.g., local ordinances) that will be used to protect stream corridors, riparian habitat, and a minimum of the 100-year floodplain from filling and development. Commitments by the project sponsors to protect area streams with riparian buffers through purchase or conservation easement are of particular interest.
12. Include a list of document preparers that shows each individual's professional background and qualifications.

10 December 2015  
Salisbury National Cemetery

We offer the following general recommendations to minimize impacts to aquatic and terrestrial wildlife resources.

1. Maintain a minimum 100-foot undisturbed, native, forested buffer along perennial streams, and a minimum 50-foot buffer along intermittent streams and wetlands. Maintaining undisturbed, forested buffers along these areas will minimize impacts to aquatic and terrestrial wildlife resources, water quality, and aquatic habitat within and downstream of the project area. Also, wide riparian buffers are helpful in maintaining stability of stream banks and for treatment of pollutants associated with stormwater. In addition, these buffers will provide an adequate travel corridor for wildlife species.
2. Measures to avoid or minimize impacts to wetlands should be implemented during construction. In addition to providing wildlife habitat, wetland areas perform important functions of flood control and water quality protection.
3. Avoid development and fill in the 100-year floodplain. Development and fill in the floodplain increases the potential for flooding and interferes with the natural hydrologic process of the waterways. It also disrupts the continuity of migration corridors for wildlife.
4. If impervious surface will exceed 10%, then stormwater management structures should be designed to mimic the hydrograph consistent with an impervious coverage of less than 10%.
5. Sediment and erosion control measures should be installed prior to any land clearing or construction. The use of biodegradable and wildlife-friendly sediment and erosion control devices is strongly recommended. Silt fencing, fiber rolls and/or other products should have loose-weave netting that is made of natural fiber materials with movable joints between the vertical and horizontal twines. Silt fencing that has been reinforced with plastic or metal mesh should be avoided as it impedes the movement of terrestrial wildlife species. These measures should be routinely inspected and properly maintained. Excessive silt and sediment loads can have numerous detrimental effects on aquatic resources including destruction of spawning habitat, suffocation of eggs, and clogging of gills of aquatic species.

At this time, the information provided is not sufficient for our staff to make definitive recommendations or conclusions concerning this project. Thank you for the opportunity to provide input in the early planning stages for this project. If we can be of further assistance, please contact our office at (336) 449-7625 or [shari.bryant@ncwildlife.org](mailto:shari.bryant@ncwildlife.org).

Sincerely,



Shari L. Bryant  
Western Piedmont Coordinator  
Habitat Conservation Division

ec: Allen Ratzlaff, USFWS  
Rupert Medford, NCWRC

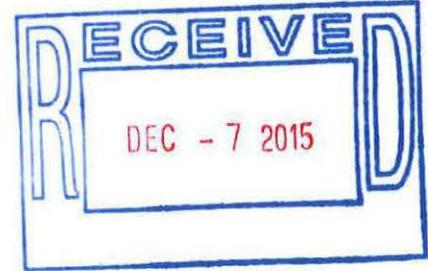


Department of the Army  
WILMINGTON DISTRICT, CORPS OF ENGINEERS  
69 DARLINGTON AVENUE  
WILMINGTON, NORTH CAROLINA 28403-1343

December 03, 2015

Regulatory Division/1200A

Action ID: SAW-2015-02539



Carol Lee-Roark, PhD, PG  
Sanderson Stewart  
106 East Babcock  
Bozeman, MT 59715

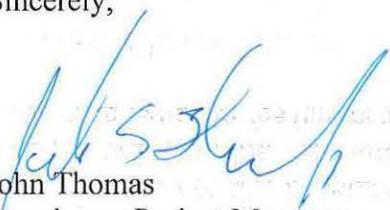
Dear Ms. Lee-Roark:

Reference is made to your letter of November 18, 2015, regarding environmental investigation and proposed expansion of the active Salisbury National Cemetery located off of Statesville Boulevard, in Salisbury, Rowan County, North Carolina. The letter requested a review of the information provided and comments with regard to the interests of our agency.

We have reviewed the subject documents and determined that, based upon a review of the information provided and available maps, the project is unlikely to impact streams and wetlands within the project area, and accordingly, would not impact jurisdictional waters of the United States which are subject to our regulatory authority pursuant to Section 404 of the Clean Water Act. However, any expansion or change in your current plans would require additional review. Therefore, please be aware that any discharge of excavated or fill material into waters of the United States and/or any adjacent wetlands will require Department of the Army (DA) permit authorization. The type of DA authorization required (i.e., general or individual permit) will be determined by the location, type, and extent of jurisdictional area impacted by the project, and by the project design and construction limits.

Should you have any further questions related to DA permits for this project, please contact me at 919-554-4884, extension 25.

Sincerely,

  
John Thomas  
Regulatory Project Manager,  
Raleigh Field Office



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Asheville Field Office  
160 Zillicoa Street  
Asheville, North Carolina 28801

December 17, 2015

Ms. Carol Lee-Roark  
Sanderson Stewart  
106 East Babcock  
Bozeman, MT 59715

Dear Ms. Lee-Roark:

Subject: Proposed Expansion of the Salisbury National Cemetery, Salisbury, Rowan County, North Carolina (Department of Veterans Affairs National Cemetery Administration Project 876-021)

We received your letter dated November 18, 2015, requesting our comments on the subject project. (Please note that you sent the letter to our Raleigh Field Office. They received it on November 23, 2015 and forwarded it to us. We received it November 27, 2015. In the future, you would receive our responses in a more timely fashion if requests were sent to the appropriate office. To assist you with this, attached is a list of North Carolina's counties showing which ones are handled by our respective offices in North Carolina.) The following comments are provided in accordance with the provisions of the National Environmental Policy Act (42 U.S.C. §4321 et seq.) and section 7 of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531-1543) (Act).

Federally Listed Endangered and Threatened Species - According to our records and a review of the information you provided, no federally listed endangered or threatened species or their habitats occur in the project area. Therefore, we believe the requirements under section 7 of the Act are fulfilled. However, obligations under section 7 of the Act must be reconsidered if: (1) new information reveals impacts of this identified action that may affect listed species or critical habitat in a manner not previously considered, (2) this action is subsequently modified in a manner that was not considered in this review, or (3) a new species is listed or critical habitat is determined that may be affected by the identified action.

We appreciate the opportunity to provide these comments and request that you continue to keep us informed as to the progress of this proposed project. If we can be of assistance or if you have any questions, please contact Mr. Allen Ratzlaff of our staff at 828/258-3939, Ext. 229. In any future correspondence concerning this project, please reference our Log Number 4-2-16-117.

Sincerely,

- - *original signed* - -

Janet Mizzi  
Field Supervisor

cc:

Ms. Shari L. Bryant, Eastern Piedmont Region Permit Reviewer, North Carolina Wildlife  
Resources Commission, P.O. Box 129, Sedalia, NC 27342-0129

# NORTH CAROLINA COUNTIES

## ASHEVILLE FIELD OFFICE WORK AREA:

Alexander	Jackson
Alleghany	Lincoln
Anson	Macon
Ashe	Madison
Avery	McDowell
Buncombe	Mecklenburg
Burke	Mitchell
Cabarrus	Polk
Caldwell	Rowan
Catawba	Rutherford
Cherokee	Stanly
Clay	Stokes
Cleveland	Surry
Davidson	Swain
Davie	Transylvania
Forsyth	Union
Gaston	Watauga
Graham	Wilkes
Haywood	Yadkin
Henderson	Yancey
Iredell	

## RALEIGH FIELD OFFICE WORK AREA:

Alamance	Lee
Beaufort	Lenoir
Bertie	Martin
Bladen	Montgomery
Brunswick	Moore
Camden	Nash
Carteret	New Hanover
Caswell	Northampton
Chatham	Onslow
Chowan	Orange
Columbus	Pamlico
Craven	Pasquotank
Cumberland	Pender
Currituck	Perquimans
Dare	Person
Duplin	Pitt
Durham	Randolph
Edgecombe	Richmond
Franklin	Robeson
Gates	Rockingham
Granville	Sampson
Greene	Scotland
Guilford	Tyrrell
Halifax	Vance
Harnett	Wake
Hertford	Warren
Hoke	Washington
Hyde	Wayne
Johnston	Wilson
Jones	

**Contact Information:**

Asheville Field Office  
 U.S. Fish and Wildlife Service  
 160 Zillicoa Street  
 Asheville, North Carolina 28801  
 Phone: 828/258-3939  
 Fax: 828/258-5330

**Contact Information:**

Raleigh Field Office  
 U.S. Fish and Wildlife Service  
 P.O. Box 33726  
 Raleigh, North Carolina 27636-3726  
 Phone: 919/856-4520  
 Fax: 919/856-4556



Natural Resources  
Conservation Service

December 8, 2015

North Carolina  
State Office

4407 Bland Road  
Suite 117  
Raleigh, NC 27609  
Voice 919-873-2171  
Fax 844-325-6833

Carol Lee-Roark, PhD, PG  
Senior Environmental Scientist  
Sanderson Stewart  
106 East Babcock  
Bozeman, MT 59715

Dear Carol Lee-Roark:

Thank you for your letter received in December 2, 2015, Subject: Request for Comments – Department of Veterans Affairs National Cemetery Administration Project 876-021 Gravesite Expansion, Salisbury National Cemetery, Salisbury, North Carolina. The following guidance is provided for your information.

Projects are subject to the Farmland Protection Policy Act (FPPA) requirements if they may irreversibly convert farmland (directly or indirectly) to non-agricultural use and are completed by a federal agency or with assistance from a federal agency. Farmland means prime or unique farmlands as defined in section 1540(c)(1) of the FPPA or farmland that is determined by the appropriate state or unit of local government agency or agencies with concurrence of the Secretary of Agriculture to be farmland of statewide local importance.

For the purpose of FPPA, farmland includes prime farmland, unique farmland, and land of statewide or local importance. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forestland, pastureland, cropland, or other land, but not water or urban built-up land.

*Farmland* does not include land already in or committed to urban development or water storage. Farmland *already in* urban development or water storage includes all such land with a density of 30 structures per 40-acre area. Farmland already in urban development also includes lands identified as *urbanized area* (UA) on the Census Bureau Map, or as urban area mapped with a *tint overprint* on the United States Geological Survey (USGS) topographical maps, or as *urban-built-up* on the United States Department of Agriculture (USDA) Important Farmland Maps.

The area in question meet one or more of the above criteria for Farmland *already in* urban development. No farmland area will be affected or converted. You are exempt from filling the AD1006 or the CPA-106 at this time.

If you have any questions, please contact Milton Cortes, Assistant State Soil Scientist at 919-873-2171 or by email: [milton.cortes@nc.usda.gov](mailto:milton.cortes@nc.usda.gov).

The Natural Resources Conservation Service  
is an agency of the Department of Agriculture's  
Natural Resources mission.

An Equal Opportunity Provider and Employer

Carol Lee-Roark  
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Again, thank you for inquiry. If we can be of further assistance, please do not hesitate to contact us.

Sincerely,

*Milton Cortes*

Milton Cortes  
Assistant State Soil Scientist