

FINDING OF NO SIGNIFICANT IMPACT (FONSI)
U.S. DEPARTMENT OF VETERANS AFFAIRS
PROPOSED CONSTRUCTION AND OPERATION OF THE 2018 MASTER PLAN EXPANSION
NATIONAL CEMETERY OF THE ALLEGHENIES
BRIDGEVILLE, WASHINGTON COUNTY, PENNSYLVANIA

1.0 Introduction

The U.S. Department of Veterans Affairs (VA), National Cemetery Administration (NCA), completed a Site-Specific Environmental Assessment (SEA), included herein by reference, to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Proposed Action to implement the 2018 Master Plan for the National Cemetery of the Alleghenies (NCOTA) at 1158 Morgan Road, Bridgeville, Washington County, Pennsylvania.

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

Under the Proposed Action, up to 10 future expansion phases would be designed according to the 2018 Master Plan. The next proposed expansion, Phase 3, would be constructed in the northern portion of NCOTA over the next two years and provide approximately 13,500 new burial sites and minor infrastructure improvements adjacent to the existing Phase 1 cemetery. Burial sites include both in ground plots and columbaria niches. Other potential future expansion phases would occur in the southern portion of NCOTA and, over the course of full buildout, would provide approximately 52,650 new burial areas, roadways, and infrastructure including stormwater and irrigation management systems. VA would evaluate the need to implement each potential future expansion phase approximately every 8-10 years. A separate Environmental Assessment (EA) would be completed prior to implementing each potential future expansion phase.

The SEA was prepared in accordance with the *National Environmental Policy Act* of 1969 ([NEPA]; 42 United States Code [USC] 4321 et seq.), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and VA's NEPA implementing regulations, 38 CFR Part 26 (*Environmental Effects of the Department of Veterans Affairs Actions*). This SEA tiers to and updates the analyses and findings presented in VA's 2001 Final SEA for the initial siting, construction, and operation of NCOTA (VA, 2001), and the Supplemental SEA for a previously proposed Phase 2 expansion (VA, 2015).

If the Proposed Action is not implemented, the longevity of NCOTA would not be extended, and future generations of eligible Veterans and their families increasingly would not have long-term, reasonable access to burial benefits at a National Cemetery in southwestern Pennsylvania. These Veterans and their families would be required to travel to a National Cemetery located more than 75 miles from southwestern Pennsylvania. Presently, in Pennsylvania, the nearest National Cemeteries to southwestern Pennsylvania include the Indiantown Gap National Cemetery in Annville (approximately 250 miles east) and the Washington Crossing National Cemetery in Newtown (approximately 345 miles east). The nearest National Cemeteries outside of Pennsylvania are the West Virginia National Cemetery in Grafton, West Virginia (approximately 90 miles south); the Ohio Western Reserve National Cemetery in Seville, Ohio (approximately 100 miles northwest); and the Culpeper National Cemetery in Culpeper, Virginia (approximately 250 miles southeast). Other National Cemeteries in Pennsylvania and beyond are not located within a reasonable distance of Veterans and their families in the southwestern Pennsylvania region.

Thus, the *purpose* of the Proposed Action is to enable NCA to continue providing interment benefits to eligible Veterans and their families by further extending the longevity of NCOTA.

Due to gravesite depletion, the Proposed Action is *needed* to allow NCA to continue meeting its goal of providing eligible Veterans with reasonable access to VA burial options in southwestern Pennsylvania.

2.0 Background

In June 2001, NCA completed an EA to analyze the potential environmental and socioeconomic impacts of a proposed action to select the approximately 292-acre site (consisting of two parcels) in northern Washington County, Pennsylvania, known as the Morgan Farms Site, and the reasonably foreseeable impacts associated with the phased construction and operation of a new national cemetery on the site (VA, 2001). The 2001 EA concluded that no significant impacts on the human environment would result, and, as a result, VA issued a Finding of No Significant Impact (FONSI). VA subsequently purchased the parcels in December 2002 and March 2003 and developed a master plan for the phased development of the property.

The initial cemetery development, Phase 1 began in 2004-2005 and included the removal of existing structures and site grading in the northern portion of the property (north of Morgan Road). The Phase 1 cemetery development included an - 8,630 gross-square-foot (gsf) administration/maintenance building, a 1,634 -gsf public information center, a flag/assembly area, two committal service shelters, a formal entrance along Morgan Road, internal roads, parking, and supporting utilities. The Phase 1 cemetery provided approximately 3,000 columbarium niches and 10,000 gravesites. Site work and construction resulted in disturbance over the majority of the northern portion of the property. To date, the southern portion of the property (south of Morgan Road) has not been developed.

In 2015, VA planned and designed a Phase 2 expansion contiguous to the Phase 1 cemetery on the northern portion of the NCOTA property. The planned design would have built out the remainder of available land on the northern portion of the NCOTA property. The 2015 Supplemental SEA for the proposed Phase 2 expansion was completed and concluded no significant adverse impacts. However, VA could not fund the entire expansion project and the phase 2 project had to be reduced in scope. The Phase 2 expansion on the northern portion of NCOTA included approximately 4794 gravesites, 5000 niche columbaria; and a 3086 square foot equipment storage building.

NCOTA began accepting burials in August 2005 and was formally dedicated on October 9, 2005 (VA, 2018b). In 2007, VA initiated an extensive master planning process to evaluate the optimal configuration for potential future expansion phases within the remainder of the NCOTA property. The master plan was reevaluated and updated in 2018.

3.0 Description of Proposed Action and Alternatives

3.1 Proposed Action

Under the Proposed Action, VA would develop potential future expansion phases according to the design specified in the 2018 Master Plan. Additionally, the Phase 3 expansion identified in the 2018 Master Plan would be constructed over the next two years in the northern portion of NCOTA to provide approximately 13,500 new burial sites and minor infrastructure improvements. The remaining 10 potential future expansion phases identified in the 2018 Master Plan would be located within an approximately 80-acre area within the southern portion of the NCOTA property. Over the course of full buildout, the southern expansion phases would provide approximately 52,650 new burial sites, connecting roadways, and infrastructure including stormwater and irrigation management systems. The Proposed Action elements are summarized in Table 1 and detailed in the outline that follows. VA would evaluate the need to implement each potential future expansion phase approximately every 8-10 years. Separate NEPA assessments would be performed prior to implementing each potential future expansion phase.

The Proposed Action would extend the longevity of NCOTA and accommodate future long-term burial needs of future generations of Veterans and their families in southwestern Pennsylvania. Therefore, the Proposed Action would meet the purpose and need for action. No other reasonable action alternatives were carried forward for this SEA.

Table 1. Summary of 2018 Master Plan Improvements

| Expansion Phase | Details of Proposed Expansion Development Activity |
|-------------------------------|--|
| Phase 3 Expansion (25 acres) | <ul style="list-style-type: none"> • Over the next two years, construct approximately 13,500 gravesites, including casket and cremain sites, in new burial sections located adjacent to the existing Phase 1 cemetery in the northern portion of the property. Provide approximately 10 years of new burial capacity. • Construct an approximately 1,500-foot long semi-circular road in the southern portion of the property, with both outlets on Morgan Road. Construct a bridge over Morgan Road to connect the Phase 1 cemetery roadway to the northern end of the new semi-circular roadway. This bridge would allow staff and visitors to safely cross Morgan Road to access potential future burial sections in the southern portion of the property. • Stormwater and irrigation system improvements in the northern property. |
| Southern Expansion (80 acres) | <ul style="list-style-type: none"> • Design for up to 10 expansion phases within approximately 80 acres within the 105-acre southern portion of the property. Provide approximately 52,650 gravesites for approximately 100 years of burial capacity. • Design includes a new southern expansion entrance along Morgan Road, with proper signage and furnishings throughout the expansion. • Design includes new access roads, stormwater management systems, and expanded irrigation system. • Design avoids sensitive cultural resources and commits to mitigate for potential wetland impacts, should any occur. |

The following outline details the specific elements of the Proposed Action for the Phase 3 expansion:

- Burial Expansion
 - To provide 10 years of service through the development of 25 acres of existing, undeveloped land to provide approximately 13,500 gravesites, including both casket and cremains sites in new burial sections. Specifically:
 - 5,800 Pre-Placed Crypts
 - 650 Oversized Pre-Placed Crypt Full Casket Gravesites
 - 650 In-Ground Traditional Full Casket Gravesites
 - 2,200 In-Ground Cremains
 - 4,224 Columbarium Niches
- Grade-Separated Connector Drive (Bridge)
 - Construction and operation of a grade-separated connector drive above Morgan Road, connecting the existing northern cemetery area to the proposed potential future cemetery in the southern portion of the property. This grade-separated connector drive would be used by staff, maintenance personnel, and visitors to safely access the southern burial sections across Morgan Road.
- Semi-Circular Roadway
 - Construction of an approximately 1,500-foot long semi-circular roadway in the southern portion of the property (the northern end of the proposed semi-circular road would connect to the proposed bridge, and the southern end would connect to Morgan Road south of the proposed bridge). This will provide a two-way loop road within the northern-most valley to facilitate efficient circulation for staff and visitors.
- Roadway System Improvements

- Repair, seal, and improve existing cemetery roadways, as needed.
- Expand Honor Guard Parking at Committal Shelters One and Two to accommodate eight-to-ten cars at each location.
- Expand cortege staging lanes at the Public Information Center.
- Upgrades to the Administration/Maintenance Complex
 - Add storage mezzanine at Maintenance Building.
 - Enclose walkway (non-climate controlled) between the Maintenance and Administration Facility.

The Proposed Action for up to 10 potential future expansion phases within the southern portion of the property would follow the design layout and avoidance measures specified in the 2018 Master Plan. It is important to note that separate NEPA analyses would be completed prior to constructing each potential future expansion phase. The design for potential future expansion phases includes the following elements:

- Burial Expansion
 - The construction and operation of additional burial facilities to provide approximately 100 years of capacity on existing, undeveloped land in the southern portion of the property. Based on the 2018 Master Plan, full buildout would require development of approximately 80 acres to provide approximately 52,650 gravesites, including both casket and cremation sites in new burial sections.
- Roadway System
 - Construction of a roadway system on the southern portion of the property to allow access to various future expansion phase areas.
 - Construction of a secondary entrance and exit along the southern portion of Morgan Road.
- Irrigation System
 - Possible construction of up to a 1.5-acre stormwater retention pond to provide irrigation water. Complete mitigation should potential impacts to wetlands be required.
 - Install irrigation system pump house and piping to support landscaped areas.

3.2 No Action Alternative

In addition to the Proposed Action, VA evaluated a No Action Alternative as part of this SEA as required by CEQ (40 CFR 1502.14). The No Action Alternative reflects the status quo and provides a comparative baseline against which to analyze the effects of the Proposed Action.

Under the No Action Alternative, the Proposed Action would not be implemented. Veterans and their families residing in southwestern Pennsylvania would be underserved in the future. Veterans who chose burial benefits at a National Cemetery with available capacity would be required to select a National Cemetery that is located more than 75 miles outside of the western Pennsylvania region. As noted above, within Pennsylvania the nearest National Cemetery is Indiantown Gap National Cemetery in Annville, is approximately 250 miles to the east, and outside of Pennsylvania it is the West Virginia National Cemetery in Grafton, West Virginia (approximately 90 miles south).

Requiring travel of more than 75 miles is considered to be an undue burden to obtain burial benefits, and would also create a hardship for the survivors of deceased Veterans wanting to attend funerals and visitations. Should this burden cause Veterans and their eligible families to resort to private burials, they are deprived of the honor and privilege bestowed upon them by a grateful nation for their service to their country. Therefore, the No Action alternative would not meet the purpose and need for action, and would not comply with the *Service Members Civil Relief Act*.

4.0 Environmental Analysis

As documented in the SEA incorporated herein, VA concludes that no significant adverse impact, considered individually or cumulatively, would result from implementing the Proposed Action on any of the environmental resource topics analyzed in the SEA.

Where potential adverse impacts to the environment are anticipated, the Proposed Action incorporates design and management measures to further minimize and maintain those impacts to less-than-significant or negligible levels. These design and management measures are described in detail in the SEA and summarized in Attachment A in this FONSI.

This FONSI also presents a summary of the anticipated adverse and beneficial impacts associated with implementing the Proposed Action to each environmental resource topic analyzed in the SEA. Construction or operation of the Proposed Action would have no adverse or beneficial impact on geology, coastal zone management, land use, or environmental justice; therefore, these topics are excluded from the following summary.

Aesthetics. Short-term, direct, less-than-significant adverse impacts could occur on aesthetics from land grading, the presence of heavy construction equipment, and unfinished stages of construction. Land clearing and grading would expose soils, which could increase fugitive dust generation and impact the appearance of finished portions of NCOTA. To minimize these potential impacts, construction areas would be obscured by fabric-covered privacy fencing, water trucks would be used to minimize fugitive dust emissions, and gravel-covered pads would be installed at the construction exits to remove loose soil from equipment exiting the construction site.

The short time-frame (24 months) for construction of cemetery expansion phases, and the prolonged time period (8-10 years) between proposed future phases, would generally avoid overlap with other projects that may also have temporary aesthetic impacts associated with the presence of on-going construction work.

Operation of the Phase 3 cemetery and potential future expansions in the southern portion of the property would provide direct, long-term, moderately beneficial aesthetic effects within the property. The Proposed Action would extend the appearance of a National Shrine throughout the property, with elements including professionally-maintained landscaped grounds, winding roadways, and retention of the natural undulating topography.

Air Quality. Short-term, direct, less-than-significant adverse impacts could occur from operating diesel-fueled construction equipment during grading, construction of interment areas, bridge/roadways, and associated infrastructure improvements. Non-road construction vehicles would generate criteria pollutant emissions and land clearing and grading activities would generate fugitive dust and fine particulate emissions. To minimize these potential impacts, construction equipment would be maintained in good working order, idling would be limited to less than five minutes, and BMPs to suppress dust and stabilize exposed soils would be implemented to further minimize particulate emissions. All anticipated emissions would be below the National Ambient Air Quality Standards (NAAQS) General Conformity Rule *de minimus* thresholds.

Operational sources of air emissions would be generated from visitors' vehicles traveling through the Phase 3 cemetery expansion and maintenance vehicles for mowing and burials. These activities would result in a negligible increase in overall emissions.

Cultural Resources. Based on prior archaeological investigations, few if any archaeological resources are anticipated to be encountered during construction or operation of the Proposed Action. The Proposed Action incorporates an inadvertent discovery plan to further avoid impacts to any archaeological resources encountered.

Topography. Although construction of the Phase 3 expansion would modify some natural topography, most of the land disturbance necessary for the Phase 3 expansion previously occurred during the Phase 1

cemetery construction. The Phase 3 expansion would realign a portion of the existing Phase 1 roadway to lessen its pitch, which would have a beneficial impact. Grading in the southern portion of NCOTA property could result in adverse impacts. These impacts would be minimized because the design for these future phases retains the generally undulating contour of the land. Therefore, the Proposed Action would have a long-term, less-than-significant adverse impact on topography.

Soils. Construction of the Proposed Action would have a short-term, less-than-significant adverse impact on soils due to increased potential for soil erosion and sedimentation of stormwater run-off. These potential impacts would be minimized by implementing construction BMPs specified in the SESC plan and PA DEP NPDES General Permit. Any coal encountered during construction would be removed and either disposed of off-site, or encapsulated on-site (using an impervious membrane) at the NCOTA spoils area located on the eastern side of I-79.

Surface Water and Wetlands. Short- and long-term, less-than-significant cumulative adverse impacts on surface water and wetlands could occur from implementation of the Phase 3 expansion and potential future expansion phases. To avoid and minimize potential impacts, expansion phases are designed to maintain existing watercourse flows using roadway bridges and avoid wetlands and transition areas. Should the potential irrigation pond be developed in the southern portion of the property during a proposed future expansion phase, appropriate mitigation for the impacted wetlands would be completed prior to development. Other potential adverse impacts on water resources, such as sedimentation of run-off, would be avoided and minimized by adhering to the BMPs in the aforementioned SESC and NPDES General Permit, as well as maintaining pre-development hydrology to the maximum extent technically practicable.

Wildlife and Habitat. Short- and long-term, less-than-significant impacts to wildlife and habitat could occur from construction activities and modification of existing undeveloped areas to landscaped grounds. To minimize these adverse impacts, the Phase 3 expansion is designed to avoid existing preservation areas and buffers along I-79 and County Line Road. Impacts to the northern-long-eared bat during the pup season would be avoided by adhering to the USFWS seasonal tree clearing restriction, which prohibits tree clearing from June 1 to July 31. Additionally, the design for potential future expansion phases focuses development in areas that have been previously managed or disturbed grasslands, thereby reducing the amount of herbaceous vegetation and tree disturbance.

Noise. Short- and long-term, less-than-significant impacts to sensitive noise receptors could occur due to noise generated from heavy construction equipment used for grading, road and infrastructure construction, and from construction workers traveling to and from the construction site within the Phase 1 cemetery. Noise impacts would be minimized by scheduling construction activities away from memorial services and providing construction workers with hearing protectors. Current operational noises from mowing and other routine maintenance activities would also occur in the Phase 3 expansion area and potential future expansion areas in the southern portion of the property. Operational impacts would be minimized by scheduling these activities at burial sections where memorial services are not actively occurring.

Socioeconomics. Short-term, direct, less-than-significant beneficial impact on socioeconomics could occur through the employment of local skilled and non-skilled workers and purchasing of materials from local or regional suppliers during construction of the Phase 3 expansion and potential future expansion phases.

Negligible beneficial impacts would occur during operation. Operation of the Phase 3 expansion is anticipated to maintain or slightly increase current staffing levels, with a slight increase in staffing to maintain potential future expansions phases. Extending the longevity of NCOTA would increase the number of visitors to the area, who may utilize local supporting businesses (restaurants, lodging, service stations), and avoiding the higher costs otherwise associated with traveling longer distances to a National Cemetery located outside of the western Pennsylvania region.

Community Services. Direct, long-term, significant beneficial impacts by providing additional burial capacity at NCOTA, benefiting Veterans and their families in the western Pennsylvania region. No impacts to other community services (e.g. police, fire, medical, schools, housing).

Solid and Hazardous Materials. Short-term, direct, negligible adverse impacts could occur from generating excess solid wastes during construction. To minimize impacts, excess construction materials would be recycled to the maximum extent practicable or transported off-site for disposal. Excess soils would be used as fill (if suitable). Operation would generate a negligible increase in typical solid wastes currently generated by cemetery operations, including memorial decorations and a minimal volume of excess soils. Licensed workers would perform any pesticide or herbicide applications according to product labels.

Transportation and Parking. Short-term, direct, less-than-significant adverse impacts could occur during travel of construction vehicles within the Phase 1 cemetery and on nearby roads. To minimize potential impacts, construction vehicle traffic would be scheduled and routed to avoid disrupting the solemnity of committal services and processions, while flaggers may be used to warn other drivers of slower moving construction vehicles entering or exiting NCOTA. Additionally, the BMPs identified for aesthetics and soils would be implemented to prevent tracking construction debris and dirt onto roadways at NCOTA and beyond.

Operation of the Phase 3 expansion and potential future expansion areas would generate a minor increase in visitor traffic. However, the Southern Beltway Project improvements by the Pennsylvania Department of Transportation (PDOT) including the new interchange would enable visitors to reach the NCOTA directly from I-79, thus avoiding increased visitor traffic on smaller, local roadways. Likewise, PDOT's realignment of Morgan Road would improve the visibility along the portion of this road that bisects the northern and southern portions of NCOTA. As mentioned under Topography, the Phase 3 expansion would realign a portion of the existing Phase 1 roadway to lessen its pitch, which would have a beneficial impact on the safety of visitor travel within NCOTA. Additionally, existing designated visitor parking areas within the Phase 1 cemetery would be expanded to alleviate current parking congestion. Therefore, operation of the Proposed Action would have a long-term, direct, negligible beneficial impact on transportation and parking.

Utilities. Long-term, direct, less-than-significant adverse impacts during operation could occur due to increased volume of potable water needed to supply irrigation water for newly landscaped grounds. As noted in the SEA, alternative on-site water sources were evaluated but determined to be inadequate. To minimize this impact, the Phase 3 expansion design limits the area requiring irrigation to approximately seven acres. The potable water would continue to be supplied by Pennsylvania American Water. Irrigation water for potential future expansion phases would be supplied by a combination of non-potable water sources, such as possible stormwater retention pond (up to 1.5 acres in area), and the potable water utility. Additional measures to reduce the operational irrigation water demand include planting and maintaining native, non-invasive drought-tolerant turfgrass and other vegetation.

Construction or operation of the Proposed Action would have no adverse impact on geology, environmental justice, coastal zone resources, and community services other than burial services. Additionally, implementing the Proposed Action is anticipated to be perceived as a positive development within the community, and therefore would not generate substantial public controversy.

5.0 Cumulative Impacts

Impacts from implementing the Proposed Action, in combination with those from past, present, and reasonably foreseeable future developments at and in the vicinity of NCOTA, are not expected to increase impacts to a significant adverse level for any of the environmental resource topics analyzed in this SEA.

Resources that have the potential to be cumulatively affected by the Proposed Action, when combined with other past, present, and reasonably foreseeable future projects at NCOTA, include Aesthetics, Cultural Resources, Topography, Soils, Surface Water and Wetlands, Wildlife and Habitat, and Noise.

Aesthetics. Cumulative impacts on aesthetics could occur from the construction of the Proposed Action in combination with present and other reasonably foreseeable future actions. However, construction of the Phase 3 expansion, as well as potential future expansion phases, would be separated by several years,

avoiding overlap. Construction of the Phase 3 expansion and the Southern Beltway Project improvements have the greatest potential for overlap. However, both projects would utilize BMPs to minimize aesthetic impacts. Furthermore, operation of both projects would result in long-term beneficial impacts on the aesthetic conditions of the area throughout decreased traffic on local roadways and expansion of the park-like setting of the Phase 1 cemetery throughout the NCOTA property. Therefore, the Proposed Action would result in less-than-significant cumulative adverse impacts on aesthetics.

Cultural Resources. Cumulative impacts on cultural resource could occur if a large number of previously unknown objects are encountered and disturbed within the expansion areas and in the area to the east of I-79 where construction of the interchange at I-79 and Morgan Road will take place as part of the Southern Beltway Project. However, based on prior archaeological investigations at the NCOTA property and information from the Pennsylvania Historical and Museum Commission (PHMC), few if any archaeological resources are anticipated to be encountered during construction of the Proposed Action. Additionally, the Proposed Action incorporates an inadvertent discovery plan to further avoid impacts to any archaeological resources encountered. Therefore, considered cumulatively, the Proposed Action would result in less-than-significant adverse impacts on cultural resources.

Topography. Cumulative impacts on topography could occur from intensive development at and surrounding NCOTA. The topography within the northern portion of NCOTA property has undergone extensive grading as a result of prior cemetery development. Although additional grading would occur during proposed future expansion phases in the southern portion of NCOTA property, the design minimizes grading by retaining the generally undulating contour of the land. The Southern Beltway Project would require only minimal grading in localized areas (ramps, roadway realignment). Therefore, considered cumulatively, the Proposed Action would result in less-than-significant adverse impacts on topography.

Soils. Cumulative impacts on soil quality could occur from past agricultural activities, and current and proposed future development of the NCOTA property for cemetery purposes. Individually, all construction activities could have short-term, negligible to minor, adverse impacts due to vegetation removal, compaction of soils, and increased soil erosion and sedimentation. Considered cumulatively, the Proposed Action and present and other reasonably foreseeable future actions have the potential for short-term, minor, adverse impacts. Construction activities occurring at the same time and in the same vicinity could have short-term, minor, adverse cumulative impacts on soils, but implementation of BMPs in the SESC plan and NPDES permit would maintain or minimize potentially adverse cumulative impacts at or below less-than-significant levels. Therefore, considered cumulatively, the Proposed Action would result in short-term, less-than-significant adverse impacts on soils.

Surface Water and Wetlands. Cumulative impacts to surface water and wetlands could occur due to past agricultural activities, and current and proposed future development of the NCOTA property for cemetery purposes. These development activities can cause erosion that leads to sedimentation of run-off and/or filling of wetlands. Future impacts would be avoided and minimized by adhering to the BMPs in the SESC and NPDES General Permit. The increase in impervious surfaces from the Proposed Action and cumulative projects could increase runoff and decrease groundwater recharge and would be considered a minor contribution in the context of the whole watershed, but would not be noticeable on a local level. Should the potential irrigation pond be developed, appropriate mitigation for the impacted wetlands would be determined and performed, as warranted.

Under the Proposed Action, existing watercourse flows would be maintained through the use of roadway bridges. Impacts to wetlands and transition areas would be avoided to the greatest extent possible through project design and implementation of BMPs. In combination with past, present and other reasonably foreseeable future actions, the Proposed Action would result in minor, less-than-significant adverse cumulative impacts on water resources.

Wildlife and Habitat. Cumulative impacts to wildlife and habitat could occur from implementing the Proposed Action. Vegetation and tree clearing at the NCOTA property could reduce habitat that supports individual wildlife species. Other projects in the vicinity of NCOTA may also reduce habitat for individual species. However, the NCOTA property and areas in the vicinity have generally been previously disturbed

or developed and are not known to contain high value habitat or serve as the home range for individual listed species. Additionally, wildlife residing in and around the NCOTA and the cumulative action areas are generally assumed to be adapted to human activities, including vehicle traffic and noise levels associated with suburban areas. Therefore, considered cumulatively, the Proposed Action would result in minor, less-than-significant adverse impacts on wildlife and habitat.

Noise. Short- and long-term, less-than-significant impacts to sensitive noise receptors could occur during construction and operation of the Proposed Action. Noise generated from other project areas would not have a cumulative impact on receptors, as the distance between these individual sources is too great to have an additive effect on noise levels. Therefore, considered cumulatively, the Proposed Action would result in short- and long-term, less-than-significant impacts on sensitive noise receptors.

6.0 Agency and Public Comment

As documented in the Final SEA, VA notified relevant federal, state, and local agencies to allow them sufficient time to make known their environmental concerns that are specific to this Proposed Action. Upon the release of the Draft SEA, VA mailed letters to notify the federal, state, and local agencies of the opportunity to review the Draft SEA and provide comments within a 30-day period beginning on December 10, 2018. The Pennsylvania Department of Conservation and Natural Resources (PADCNR) concurred with the findings presented in the Draft SEA. No other agency provided comments.

VA also made the Draft SEA available for public review and comment during the 30-day period. A Notice of Availability (NOA) announcing the release of the Draft SEA was published in the *Pittsburg Post-Gazette* on December 7, 9, 14, and 16, 2018. The NOA indicated that the Draft SEA was available in print at the NCOTA Public Information Center; the Frank Sarris Public Library, 35 North Jefferson Avenue, Canonsburg, PA; the Bridgeville Public Library, 505 McMillen Street, Bridgeville, PA; and in electronic format from VA's website at <http://www.cem.va.gov/cem/EA.asp>. No public comments on the Draft SEA were received.

7.0 Finding of No Significant Impact

As a result of the analysis of impacts in the Final SEA, summarized and incorporated by reference herein, it is the conclusion of VA that, with the implementation of appropriate management, avoidance, and regulatory compliance measures included herein as Attachment A, the Proposed Action would not generate significant public controversy and would cause no significant impact of an adverse nature on the quality of the natural or human environment within the meaning of Section 102(2)(C) of the *National Environmental Policy Act* of 1969. Therefore, per the NEPA, the CEQ regulations, and 38 CFR Part 26, I am signing this FONSI, and preparation of an Environmental Impact Statement for the Proposed Action is not required.

Willie Clyde Marsh

Willie (Clyde) Marsh
Executive Director
NCA North Atlantic District

April 9, 2019

Date

Fernando Fernández

Mr. Fernando L. Fernández, REM, HEM
Environmental Engineer
VA Construction and Facilities Management Office

April 9, 2019

Date

ATTACHMENT A

Best Management Practices, Environmental Avoidance and Protection Measures, and Regulatory Compliance Measures Incorporated into the Proposed Action

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|---|
| <i>AESTHETICS</i> |
| Construction |
| <ul style="list-style-type: none"> ▪ Construct the expansion phases according to the design and sequence presented in the 2018 Master Plan. |
| <ul style="list-style-type: none"> ▪ Control fugitive dust emissions by implementing industry-standard construction BMPs, including using water trucks for dust suppression, brushing dirt off construction vehicle tires before leaving the construction site, and installation of gravel pads at the construction exits to further prevent the tracking of dirt onto roadways. |
| <ul style="list-style-type: none"> ▪ As needed, install construction privacy fencing between the expansion area and the existing cemetery burial sections to reduce visual impacts to visitors. |
| <ul style="list-style-type: none"> ▪ Plant native, non-invasive, drought-resistant vegetation following grading. |
| Operation |
| <ul style="list-style-type: none"> ▪ Professionally maintain the landscaped areas consistent with existing cemetery operations. |
| <ul style="list-style-type: none"> ▪ Conduct maintenance activities (mowing, power-washing, etc.) on a schedule that limits potential disruptions to committal services. |
| <i>AIR QUALITY</i> |
| Construction |
| <ul style="list-style-type: none"> ▪ Implement the dust control BMPs described for aesthetics. |
| <ul style="list-style-type: none"> ▪ Utilize appropriate construction scheduling (avoid earthwork during extremely windy and dry periods). |
| <ul style="list-style-type: none"> ▪ Stabilize exposed soil with vegetation or mulching to minimize erosion and potential dust generation. |
| <ul style="list-style-type: none"> ▪ Construction vehicles traveling on paved roads within and outside of NCOTA would follow posted speed limits. This would minimize dust generated by vehicles and equipment on paved surfaces. |
| <ul style="list-style-type: none"> ▪ On unpaved surfaces at the site, vehicle speeds will be maintained at or below 5 miles per hour to prevent dust generation of any exposed soil. Additionally, should any vehicles transport soil from one area of the property to another, the soil will be covered with haul tarps. |
| <ul style="list-style-type: none"> ▪ Visually monitor construction activities on a daily basis, and particularly during extended periods of dry weather; implement additional dust control measures as needed. |
| Operation |
| <ul style="list-style-type: none"> ▪ Keep landscaping and maintenance equipment (mowers, power washers used to clean monuments, etc.) in good working order. |

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| CULTURAL RESOURCES |
| Construction and Operation |
| <ul style="list-style-type: none"> Implement the “Inadvertent Discovery” plan as follows; should human remains or other cultural items as defined by the <i>Native American Graves Protection and Repatriation Act</i> (NAGPRA) be discovered during project construction, the construction contractor shall immediately cease work until VA, a qualified archaeologist, and the SHPO, and the Delaware Tribe of Indians are contacted to properly identify and appropriately treat discovered items in accordance with applicable federal and state regulations. |
| <ul style="list-style-type: none"> Establish a 75-foot setback around the boundary of the Tombstone Site (36WH153) to exclude it from all potential future ground disturbing activities. |
| GEOLOGY, SOILS, AND TOPOGRAPHY |
| Construction |
| <ul style="list-style-type: none"> Follow NCA Guidelines on slopes and grades. Generally, grade individual burial sections to less than 6%, and pitch roads no greater than 10%. |
| <ul style="list-style-type: none"> Prepare and implement a soil erosion and sedimentation control (SESC) plan as part of the PA DEP General NPDES Permit and approved by the Washington County Conservation District (WCCD). Implement the specified BMPs. |
| <ul style="list-style-type: none"> Prepare and implement a stormwater management plan consistent with Chapter 102 of PA State Code approved by WCCD. Implement the specified BMPs. |
| <ul style="list-style-type: none"> Quickly revegetate disturbed areas following completion of construction activities to minimize the length of time that soils are exposed. |
| <ul style="list-style-type: none"> Minimize the disturbance to or creation of steep slopes (do not exceed 15% slopes). |
| <ul style="list-style-type: none"> Implement spill and leak prevention and response procedures for construction equipment, including maintaining a complete spill kit at the project area, to minimize the potential impact from an accidental fuel release on soil quality. Refuel equipment in designated impervious areas. |
| <ul style="list-style-type: none"> Re-use excess soils on-site to the maximum extent practicable. |
| <ul style="list-style-type: none"> Extract coal if encountered and manage according to PADEP Surface Mining Conservation and Reclamation Act (25 PA Code Section 86.6). |
| Operation |
| <ul style="list-style-type: none"> Avoid soil erosion and sedimentation of run-off by maintaining stormwater management systems so these systems meet their design requirements throughout operation of the Proposed Action. |
| <ul style="list-style-type: none"> Revegetate exposed soils to prevent erosion and manage excess soils by stockpiling in the designated spoils area. |
| HYDROLOGY AND WATER QUALITY |
| Construction and Operation |
| <ul style="list-style-type: none"> Implement the soil erosion and stormwater management system BMPs listed above for Geology, Soils, and Topography. |
| <ul style="list-style-type: none"> Design the Proposed Action expansions to comply with the <i>Energy Independence and Security Act</i> (EISA) Section 438 Stormwater Management for Federal Facilities, to the maximum extent technically feasible. |
| <ul style="list-style-type: none"> Design the Proposed Action expansions to adhere to guidance in the PA Stormwater BMP Manual (363-0300-002, December 2006) for pre- and post-development stormwater management. |
| <ul style="list-style-type: none"> Maintain native, non-invasive, drought-resistant vegetation to prevent exposure of underlying soils. |
| <ul style="list-style-type: none"> Route stormwater runoff from impervious surfaces to designated stormwater management systems. Maintain these in good working order during construction and operation. |

- Apply pesticides/herbicides according to label requirements and keep these and road deicing usage to the lowest quantities possible, thereby reducing the potential for water quality impacts.
- Maintain and utilize emergency spill kits to protect surface water and groundwater quality from incidental releases of petroleum-based fluids from construction equipment, and refuel equipment in designated impervious areas away from surface water resources.
- Design crypt fields with an adequate underdrainage system to avoid prolonged contact with groundwater per NCA design requirements.

HABITAT AND WILDLIFE

Construction and Operation

- Avoid impacts to wildlife and habitats by developing only the necessary area needed to establish interment areas, roadways, and other physical infrastructure, as depicted in the 2018 Master Plan. Avoid development and disturbances to the existing preservation area in the northern portion of the property.
- Implement the USFWS Avoidance Measure that prohibits any tree removal from June 1 to July 31. This would ensure there is no prohibited incidental take of northern long-eared bats during the pup season.

NOISE

Construction

- Schedule construction activities for daylight hours during the weekday to minimize potential impacts to nearby residential areas during otherwise quieter evening and weekend periods.
- Maintain mufflers and sound shielding on construction equipment and shut down construction equipment when not in use for more than 5 minutes.
- Schedule notably loud construction work to avoid impacts during memorial services.
- Provide hearing protection to workers for activities that will exceed the OSHA permissible noise exposure level.

Operation

- Maintain routine maintenance equipment (e.g. lawn mowers) in good working order.
- Operate maintenance equipment during daylight working hours and away from committal services, thereby maintaining the dignity and solemnity of NCOTA environment during these services.

WETLANDS

Construction and Operation

- Implement the management measures specified above for Soils and Hydrology and Water Quality to prevent sedimentation of run-off and potential migration to wetlands.
- Follow the design in the 2018 Master Plan for the Phase 3 expansion, which avoids wetlands entirely.
- If the potential irrigation pond is constructed, prior to construction obtain a USACE 404 permit and a PADEP Chapter 105 Water Obstruction and Encroachment permit.

SOLID WASTE AND HAZARDOUS MATERIALS

Construction

- Reuse excess construction materials to the maximum extent practicable. Recycle materials that cannot be reused. Properly dispose of all other materials. Follow NCA Master Construction Specifications for construction waste management.

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| <ul style="list-style-type: none"> ▪ Manage coal according to the requirements specified for Soil. |
| <ul style="list-style-type: none"> ▪ Should a UST be discovered during potential future expansion phases in the southern portion of the property, the UST and any potentially contaminated soil would be removed and disposed of according to the PADEP Division of Storage Tanks Closure Requirements for Underground Storage Tanks (Technical Guidance 253-4500-601; effective July 8, 2017). |
| <p>Operation</p> |
| <ul style="list-style-type: none"> ▪ Manage new solid waste volumes with existing and similar waste streams for collection and off-site disposal. |
| <ul style="list-style-type: none"> ▪ Manage herbicide and pesticide use as described under Soils. |
| <p>TRANSPORTATION AND PARKING</p> |
| <p>Construction</p> |
| <ul style="list-style-type: none"> ▪ If required, utilize flaggers to notify oncoming traffic of slower construction vehicles entering or exiting Morgan Road from the construction entrance. |
| <ul style="list-style-type: none"> ▪ Schedule and route construction vehicle traffic away from roadways within the existing cemetery to avoid interfering with committal service processions. |
| <ul style="list-style-type: none"> ▪ Utilize BMPs specified for Soil to avoid tracking dirt onto area roadways. |
| <p>UTILITIES</p> |
| <p>Construction and Operation</p> |
| <ul style="list-style-type: none"> ▪ For potential future expansion phases in the southern portion of the property, determine irrigation needs and utilize non-potable water sources to the maximum extent practicable. |
| <ul style="list-style-type: none"> ▪ Coordinate with Pennsylvania American Water (potable water utility) prior to extending potable water utility service lines to irrigation systems for potential future expansion phases in the southern portion of the property. Ensure the utility can supply the water demand without impacting service quality to other customers. |
| <ul style="list-style-type: none"> ▪ Reduce operational irrigation water demand by planting and maintaining native, non-invasive drought-tolerate turfgrass and other vegetation. |