FINAL
Site-Specific Environmental Assessment:
Proposed Construction and Operation of the 2018 Master Plan Expansion
National Cemetery of the Alleghenies
Bridgeville, Washington County, Pennsylvania

U.S. Department of Veterans Affairs
425 I Street, NW
Washington, DC 20001
March 2019
EXECUTIVE SUMMARY

In this Site-Specific Environmental Assessment (SEA), the U.S. Department of Veterans Affairs (VA), National Cemetery Administration (NCA) identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with the Proposed Action to implement VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania.

Under the Proposed Action, future expansion phases would be designed according to the 2018 Master Plan. The next proposed expansion is Phase 3, which would be constructed in the northern portion of NCOTA over the next two years and provide approximately 13,500 new burial areas and minor infrastructure improvements adjacent to the Phase 1 cemetery in the northern portion of NCOTA. The 2018 Master Plan also includes up to 10 potential future expansion phases in the southern portion of NCOTA. Over the course of full buildout, the southern expansion phases would provide approximately 50,900 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. Separate National Environmental Policy Act (NEPA) assessments would be performed prior to implementing a potential future expansion phase.

VA has determined that if the longevity of NCOTA is not extended by expanding burial capacity beyond the current Phase 1 cemetery, then 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. Presently, in Pennsylvania, the nearest National Cemeteries to southwestern Pennsylvania include the Indiantown Gap National Cemetery in Annville (approximately 250 miles east) and the Philadelphia National Cemetery in Philadelphia (approximately 325 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 Winchester National Cemetery in Winchester, Virginia (approximately 130 miles south). These National Cemeteries in Pennsylvania and beyond are not located within a reasonable distance of Veterans and their families in the southwestern Pennsylvania region.

Purpose and Need

Accordingly, 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.

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.

Alternatives

VA has prepared this SEA to evaluate the potential impacts of implementing the Proposed Action. This SEA also evaluates the potential impact of a “No Action” alternative, defined as not implementing the Proposed Action and maintaining conditions at NCOTA as they currently exist. These two alternatives are summarized below:
The **Proposed Action** is to implement potential expansions at NCOTA according to the 2018 Master Plan design. The Phase 3 expansion in the northern portion of the property would be constructed over the next two years and provide approximately 13,500 new burial sites, while up to 10 potential future expansion phases in the southern portion of the property would provide approximately 50,900 new burial sites, roadways, and other infrastructure improvements. The need for potential future expansion phases would be evaluated by VA every 8-10 years, with separate NEPA analyses completed prior to implementing an expansion. The Proposed Action meets the purpose and need for action and would extend the longevity of NCOTA and accommodate long-term burial needs of future generations of Veterans and their families in southwestern Pennsylvania.

The **No Action** alternative is to maintain NCOTA as it presently exists and not implement the Proposed Action expansion phases described in the 2018 Master Plan. Under the No Action alternative, 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. Accordingly, the No Action alternative does not meet the purpose and need for action.

**Affected Environment and Environmental Consequences**

The following table summarizes the potential environmental impacts of the Proposed Action and the No Action alternative.

<table>
<thead>
<tr>
<th>Resource / Issue</th>
<th>Proposed Action</th>
<th>No Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aesthetics</td>
<td>Short-term, direct, less-than-significant adverse impacts during construction due to the use and presence of heavy construction equipment for grading. Direct, long-term, moderately beneficial aesthetic impact from the expansion of the park-like setting through the property.</td>
<td></td>
</tr>
<tr>
<td>Air Quality</td>
<td>Short-term, direct, negligible, adverse impact from construction vehicle emissions and dust generation. Long-term, direct, negligible adverse impact from increased visitors and maintenance activities during operation.</td>
<td></td>
</tr>
<tr>
<td>Cultural Resources</td>
<td>No adverse effect on known archaeological or above-ground resources. Long-term, direct, less-than-significant adverse levels due to inadvertently encountering potentially unknown cultural resources during construction of future expansion phases.</td>
<td></td>
</tr>
<tr>
<td>Geology, Topography, and Soils</td>
<td>Short-term, direct, negligible adverse impact on geology due to grading. Long-term, less-than-significant adverse impacts on topography due to grading for burial areas and roads. Short-term, direct, less-than-significant adverse impact on soils due to potential erosion during construction; negligible adverse impact during operation.</td>
<td></td>
</tr>
<tr>
<td>Hydrology and Water Quality</td>
<td>Short-term, direct, less-than-significant adverse impact on surface water during construction from potential sedimentation of run-off, and negligible impact during operation. Short-term, direct, negligible adverse impact on groundwater during construction; long-term, direct, negligible impacts during operation.</td>
<td></td>
</tr>
<tr>
<td>Wildlife and Habitat</td>
<td>Short-term, less-than-significant adverse impacts on terrestrial wildlife species and on the quality of the habitat at the site due to disturbance during construction. No impact to listed species due to avoidance measures.</td>
<td></td>
</tr>
<tr>
<td>Resource / Issue</td>
<td>Proposed Action</td>
<td>No Action</td>
</tr>
<tr>
<td>-------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-----------</td>
</tr>
<tr>
<td>Noise</td>
<td>Short-term, direct, less-than-significant adverse impact from construction noise on visitors and off-site receptors. Short-term, direct, negligible adverse impacts from rifle salutes and maintenance activities during operation.</td>
<td>None.</td>
</tr>
<tr>
<td>Land Use</td>
<td>No impact.</td>
<td>None.</td>
</tr>
<tr>
<td>Floodplains and Wetlands</td>
<td>Construction of the Phase 3 expansion avoids wetlands and would have no impact. Construction of potential future expansions in the southern area would have long-term, direct, minor adverse impact if a 0.19-acre wetland is converted up to a 1.5-acre potential irrigation pond, and from potential stormwater impacts. Operation would have long-term, direct, negligible impacts due to potential stormwater impacts and routine maintenance activities. NCOTA is outside of 100- and 500-year floodplains; no impact.</td>
<td>None.</td>
</tr>
<tr>
<td>Socioeconomics</td>
<td>Short-term, direct, less-than-significant beneficial impact on the local economy from construction employment and material purchases. Long-term, direct and indirect, negligible beneficial impact during operations from increased visitors, potential increase in spending on area services, and minimizes visitors’ travel costs.</td>
<td>None.</td>
</tr>
<tr>
<td>Community Services</td>
<td>Long-term, direct, significant beneficial impact due to the increased burial capacity and longevity of NCOTA.</td>
<td>None.</td>
</tr>
<tr>
<td>Solid and Hazardous Materials</td>
<td>Short-term, direct, negligible adverse impacts from generation of construction debris. Long-term, direct, negligible adverse impact from continued generation of operational solid wastes, soils, and herbicide/pesticide applications.</td>
<td>None.</td>
</tr>
<tr>
<td>Transportation and Parking</td>
<td>Short-term, direct, negligible adverse impact on transportation and parking during the construction phase. Long-term, direct, negligible beneficial impact from expanded parking within NCOTA and improved safety due to widening and flattening of Morgan Road.</td>
<td>None.</td>
</tr>
<tr>
<td>Utilities (potable water only)</td>
<td>No potable water consumed during construction; therefore, no adverse impact. Volume of potable water for irrigation of Phase 3 expansion would not decrease service quality to other customers. Coordination with potable water utility would be completed prior to operation of potential future expansion phases in the southern portion of the property to ensure potable water utilization would not have a significant adverse impact on service quality to others.</td>
<td>None.</td>
</tr>
<tr>
<td>Environmental Justice</td>
<td>No impact; no environmental justice issues or communities within area.</td>
<td>None.</td>
</tr>
<tr>
<td>Potential for Generating Substantial Controversy</td>
<td>The community is anticipated to expect that VA would expand NCOTA to provide sufficient burial capacity for the next several decades. Therefore, implementing the Proposed Action would not generate substantial controversy.</td>
<td>Not expanding NCOTA conflicts with community expectations and therefore would generate substantial negative controversy.</td>
</tr>
</tbody>
</table>
The impacts from the Proposed Action, when considered on a cumulative basis with impacts from past projects and probable future projects at and in the vicinity of NCOTA, still remain at less-than-significant adverse levels for all of the environmental resources analyzed in this SEA. Likewise, the No Action alternative would remain at a significant adverse level on a cumulative basis due to the unmitigated impact on Community Services (decreased longevity of NCOTA due to the lack of burial opportunities at a National Cemetery within a reasonable distance from southwestern Pennsylvania). Therefore, VA has selected the Proposed Action as the preferred action alternative.

**Agency and Public Involvement**

The Draft SEA, dated November 2018, was made available for review and comment from December 7, 2018, to January 16, 2019. 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. No comments from the public were received. The Pennsylvania Department of Conservation and Natural Resources Bureau of Forestry concurred with the findings of the Draft SEA. No other regulatory agency provided comments.

**Conclusion**

The analyses presented in the Draft SEA and comments received provide sufficient evidence and analysis for VA to determine that the Proposed Action would not cause significant environmental impacts on the environmental resources presented herein. Thus, VA concludes that an Environmental Impact Statement (EIS) is not warranted and has prepared a finding of no significant impact (FONSI) (40 CFR 1508.9). A NOA announcing the release of the Final SEA and FONSI has been published in the *Pittsburg Post-Gazette*. 

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<th>Description</th>
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<tr>
<td>ACHP</td>
<td>Advisory Council on Historic Preservation</td>
</tr>
<tr>
<td>ACS</td>
<td>American Community Survey</td>
</tr>
<tr>
<td>AIRFA</td>
<td>American Indian Religious Freedom Act</td>
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<tr>
<td>amsl</td>
<td>Above Mean Sea Level</td>
</tr>
<tr>
<td>APE</td>
<td>Area of Potential Effect</td>
</tr>
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<td>AQCR</td>
<td>Air Quality Control Region</td>
</tr>
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<td>ARPA</td>
<td>Archaeological Resources Protection Act</td>
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<tr>
<td>AST</td>
<td>Aboveground Storage Tank</td>
</tr>
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<td>ASTM</td>
<td>American Society for Testing and Materials</td>
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<td>Bureau of Historic Preservation</td>
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<td>BLS</td>
<td>Bureau of Labor Statistics</td>
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<td>BMP</td>
<td>Best Management Practice</td>
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<td>Clean Air Act</td>
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<td>CEC</td>
<td>Civil &amp; Environmental Consultants, Inc.</td>
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<td>CEQ</td>
<td>Council on Environmental Quality</td>
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<td>CFR</td>
<td>Code of Federal Regulations</td>
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<tr>
<td>CO</td>
<td>Carbon Monoxide</td>
</tr>
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<td>CWA</td>
<td>Clean Water Act</td>
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<tr>
<td>dBA</td>
<td>A-weighted decibel</td>
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<td>Environmental Assessment</td>
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<td>Final Environmental Impact Statement</td>
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<td>Finding of No Significant Impact</td>
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<tr>
<td>gsf</td>
<td>gross square feet</td>
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<tr>
<td>LUST</td>
<td>Leaking Underground Storage Tank</td>
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<tr>
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<tr>
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<td>National Cemetery Administration</td>
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<td>NCOTA</td>
<td>National Cemetery of the Alleghenies</td>
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<td>National Environmental Policy Act</td>
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<tr>
<td>NO₂</td>
<td>Nitrogen Dioxide</td>
</tr>
<tr>
<td>NOA</td>
<td>Notice of Availability</td>
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<td>National Oceanic and Atmospheric Administration</td>
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<td>NOI</td>
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<td>NPDES</td>
<td>National Pollution Discharge Elimination System</td>
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<td>NPS</td>
<td>National Park Service</td>
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<tr>
<td>Acronym</td>
<td>Full Form</td>
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<tr>
<td>NRCS</td>
<td>Natural Resources Conservation Service</td>
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<tr>
<td>NRHP</td>
<td>National Register of Historic Places</td>
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<tr>
<td>NWI</td>
<td>National Wetlands Inventory</td>
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<tr>
<td>O₃</td>
<td>Ozone</td>
</tr>
<tr>
<td>OCFM</td>
<td>VA Office of Construction and Facility Management</td>
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<td>OSHA</td>
<td>Occupational Safety and Health Administration</td>
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<tr>
<td>PA</td>
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</tr>
<tr>
<td>PADNR</td>
<td>Pennsylvania Department of Conservation and Natural Resources</td>
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<td>Pennsylvania Department of Environmental Protection</td>
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<tr>
<td>Pb</td>
<td>Lead</td>
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<tr>
<td>PEM</td>
<td>Palustrine Emergent</td>
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<tr>
<td>PFO</td>
<td>Palustrine Forested</td>
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<tr>
<td>PGC</td>
<td>Pennsylvania Game Commission</td>
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<tr>
<td>PHMC</td>
<td>Pennsylvania Historical and Museum Commission</td>
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<tr>
<td>PJD</td>
<td>Preliminary Jurisdictional Determination</td>
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<tr>
<td>PM</td>
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<tr>
<td>PNDI</td>
<td>Pennsylvania Natural Diversity Inventory</td>
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<tr>
<td>PTC</td>
<td>Pennsylvania Turnpike Commission</td>
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<tr>
<td>RCRA</td>
<td>Resource Conservation and Recovery Act</td>
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<tr>
<td>ROD</td>
<td>Record of Decision</td>
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<td>Site-Specific Environmental Assessment</td>
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<td>SESC</td>
<td>Soil Erosion and Sedimentation Control</td>
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<td>State Hazardous Waste Site reports</td>
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<td>SIP</td>
<td>State Implementation Plan</td>
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<tr>
<td>SO₂</td>
<td>Sulfur Dioxide</td>
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<tr>
<td>SR</td>
<td>State Route</td>
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<td>Stormwater Management Facility</td>
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<td>United States</td>
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<td>U. S. Army Corps of Engineers</td>
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<td>United States Code</td>
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<td>United States Department of Agriculture</td>
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<td>WCCD</td>
<td>Washington County Conservation District</td>
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1.0 INTRODUCTION
The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) honors Veterans and their families with final resting places in National Shrines and with lasting tributes that commemorate their service and sacrifice to the nation. NCA maintains approximately 3.3 million gravesites at 135 National Cemeteries and 33 soldiers’ lots and monument sites in 40 states and Puerto Rico. VA’s Office of Construction and Facility Management’s (OCFM) mission is to advance VA’s mission in support of the nation’s Veterans by planning, designing, constructing, and acquiring major facilities, and setting design and construction standards. This Site-Specific Environmental Assessment (SEA) evaluates the proposed Master Plan for near-term and long-term expansion of the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania, 15017 (Figure 1). The NCOTA is located 20 miles southwest of downtown Pittsburgh in the northern portion of Washington County.

1.1 Background and Existing Site Details
NCOTA covers an approximately 292-acre area adjacent to Interstate 79 (I-79). Morgan Road passes through the approximate center of the property, dividing it into the “northern” and “southern” portions.

In June 2001, NCA completed an Environmental Assessment (EA) to analyze the potential environmental and socioeconomic impacts of a proposed action to select the approximately 292-acre 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). Subsequently, VA purchased the approximately 292-acre site (consisting of two parcels) from private citizens in December 2002 and March 2003.

The site is now designated as NCOTA. The initial NCOTA development phase (Phase 1) began in 2004-2007 in the northern portion of the property, north of Morgan Road. The Phase 1 development included the removal of existing structures from the northern and southern areas, and the construction in the northern area of an 11,400-gross-square-foot (gsf) administration/maintenance building and a 3,100-gsf public information center. In addition, the development included an entrance feature, a flag/assembly area, and two committal service shelters, each of which was approximately 600-gsf and included a utility and storage closet. Related site work including grading, internal roads, parking, and utilities was accomplished in Phase 1. During Phase 1, approximately 3,000 columbarium niches and 10,000 gravesites were constructed. These gravesites included pre-placed crypts and standard gravesites, depending upon site geology and the ability to excavate gravesites to a required depth. Gravesite sections were typically developed in 1- to 2-acre plots, so that the scale is more personal. To the degree possible, existing trees and vegetation were used as natural boundaries between these gravesite sections. Construction of these facilities and related site work (clearing, grading) resulted in disturbance over the majority of the northern portion of the property. To date, the southern portion of the site (south of Morgan Road) has not been developed by VA.

Three access roads were constructed, with the main entrance road from Morgan Road designated for visitors and funerals. In addition, there is a secondary entrance road to the portion of the cemetery located on the opposite side of Morgan Road from the main entrance. The third access road is a service road from Morgan Road to the portion of the Morgan property located east of I-79.
NCOTA accepted its first burials in August 2005, with a formal dedication taking place on October 9, 2005 (VA, 2018b).

Currently, on average, eight burials are performed per day, with a greater number of burials performed on Mondays and Fridays.

1.2 Problem Statement

The 2001 EA concluded that by the planning year 2030, the cumulative interments at NCOTA would be approximately 48,729 (VA, 2001). The completion of the Phase 1 cemetery provided approximately 13,000 interments.

Accordingly, in 2007 VA initiated an extensive master planning process to determine the optimal configuration for potential future expansion phases within the remainder of NCOTA property. In 2015, VA considered implementing a Phase 2 expansion in the northern portion of the property and contiguous to the Phase 1 cemetery. A Supplemental Site-Specific EA (“2015 EA”) was prepared to analyze and evaluate the potential effects of this proposed expansion, and in 2015 VA concluded that the proposed Phase 2 expansion would have no significant adverse impacts (VA, 2015). However, the Phase 2 expansion was not immediately implemented because VA determined that the design for the proposed Phase 2 expansion required modifications necessary to better align with the natural topography and physical features within the northern portion of NCOTA.

As a result, in 2018 VA completed a new Master Plan (2018 Master Plan) which detailed the design for the proposed expansion in the northern portion of the property (now called the “Phase 3 expansion”), and for up to 10 potential future expansion phases in the approximately 105-acre southern portion of the property (Southern Expansion) where, to date, no cemetery development has occurred (see Figures 2A and 2B). Under the 2018 Master Plan, the proposed Phase 3 expansion would provide approximately 13,500 new burial areas adjacent to the Phase 1 cemetery in the northern portion of NCOTA and minor infrastructure improvements, while up to 10 potential future development phases in the southern portion of NCOTA would provide a total of approximately 50,900 new burial areas over the course of full buildout. In total, the 2018 Master Plan would provide approximately 64,400 additional casket, columbarium, and in-ground cremation sites; new roadways connecting existing and new burial areas; and improvements to other infrastructure including maintenance and stormwater and irrigation management systems. A summary of the major elements of the 2018 Master Plan is provided in Table 1.

Presently, in Pennsylvania, the nearest National Cemeteries to southwestern Pennsylvania include the Indiantown Gap National Cemetery in Annville (approximately 250 miles east) and the Philadelphia National Cemetery in Philadelphia (approximately 325 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 Winchester National Cemetery in Winchester, Virginia (approximately 130 miles south). The National Cemeteries in Pennsylvania and beyond are not located within a reasonable distance of Veterans and their families in the southwestern Pennsylvania region.
Based on this information, VA determined that if the longevity of NCOTA is not extended by expanding burial capacity beyond the current Phase 1 cemetery, then future generations of eligible Veterans and their families increasingly would not have long-term, reasonable access to burial benefits at a National Cemetery in the southwestern Pennsylvania region.

Therefore, VA has concluded that a Proposed Action is necessary to address this problem.

### 1.3 Purpose and Need for the Proposed Action

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.

Without the Proposed Action, 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.

Accordingly, VA has determined that implementing the 2018 Master Plan as the Proposed Action would effectively address the problem and meet the purpose and need described above. A detailed description of the Proposed Action and alternatives is presented in Section 2.0.

#### Table 1. Summary of 2018 Master Plan Improvements

<table>
<thead>
<tr>
<th>Expansion Phase</th>
<th>Details of Proposed Expansion Development Activity</th>
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| Phase 3 Expansion   | - The construction of additional burial sections intended to provide approximately 10 years of burial capacity. This phase would develop approximately 25 acres of land proximate to existing Phase 1 burial areas and infrastructure. The Phase 3 expansion would provide approximately 13,500 gravesites, including casket and cremains sites.  
- A grade-separated connector drive (bridge over Morgan Road) would be constructed along with a 1,500-foot long semi-circular road in the southern portion of the property. This would be used by staff, maintenance personnel, and visitors to safely access potential future southern burial sections across Morgan Road.  
- Stormwater and irrigation system improvements.                                                                 |
| (25 acres)          |                                                                                                                     |
| Southern Expansion  | - Up to 10 expansion phases providing approximately 100 years of burial capacity on existing, undeveloped land south of Morgan Road. Multiple phases would develop a total of approximately 80 acres of the 105-acre area, providing approximately 50,900 gravesites.  
- A new southern expansion entrance along Morgan Road, with proper signage and furnishings throughout the expansion.  
- New access roads, stormwater management systems, and expanded irrigation system.                                      |
| (80 acres)          |                                                                                                                     |
Figure 1. Site Location
Figure 2A. Proposed Action: 2018 Master Plan for Phase 3 and Potential Future Expansion Phases
Figure 2B. Proposed Action: 2018 Master Plan Phasing Detail
1.4 Regulatory Requirements

The National Environmental Policy Act (NEPA) of 1969 established the national policy for the environment and for the Council on Environmental Quality (CEQ), and provides for the consideration of environmental issues in federal agency planning and decision-making. To implement the NEPA policies, CEQ promulgated the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR Parts 1500-1508, referred to as the CEQ Regulations).

VA’s procedures to comply with NEPA are set forth in 38 CFR Part 26, Environmental Effects of the Department of Veterans Affairs Actions. These regulations establish VA policies and responsibilities to integrate environmental considerations early in the decision-making process. Instructions on preparing NEPA documentation and carrying out public and agency coordination are provided in VA’s NEPA Interim Guidance for Projects (VA, 2010).

These requirements specify that prior to taking action, VA must evaluate the potential environmental impacts of VA facilities, operations, and related funding decisions. The evaluation of the potential environmental impacts of the proposed action and alternatives includes direct, indirect, and cumulative effects, as well as a qualitative and quantitative (where possible) assessment of the level of significance of these effects. Additionally, as required by NEPA and the implementing regulations from CEQ and VA, the alternative of taking no action is also evaluated, providing a baseline for comparison of potential impacts from the action alternative(s).

An EA provides a sufficient level of analysis and evidence to evaluate whether or not an action would cause a significant environmental impact. When the EA concludes there is no significant impact, VA may issue a Finding of No Significant Impact (FONSI) (40 CFR Part 1508.9). A FONSI is a decision document that briefly presents the reasons why an action would not have a significant effect on the human environment (40 CFR Part 1508.13). Conversely, when an action may have a significant adverse impact on the environment, VA may consider issuing a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS).

1.5 Scope of the Analysis

This SEA has been prepared to analyze and evaluate the potential effects of the Proposed Action to implement the 2018 Master Plan for NCOTA. Specifically, this SEA evaluates the potential environmental impacts from construction and operation of the proposed Phase 3 expansion and the potential future development phases for the southern area. Further details of the Proposed Action are provided in Section 2.0. It is noted that separate NEPA analyses would be performed prior to development of each potential future expansion phase in the southern area.

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 the previously proposed northern expansion (VA, 2015). This approach is in full compliance with CEQ Regulations that state that NEPA documents should be “analytic rather than encyclopedic” (40 CFR Part 1502.2a) and that scoping should be used to “identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (40 CFR Part 1506.3), narrowing the discussion of these issues in the statement [SEA] to a brief presentation of why they would not have a significant effect on the human environment or providing a reference to their coverage elsewhere” (40 CFR Part 1501.7(a)(3)). Accordingly, VA
is using "Incorporation by Reference" per 40 CFR Part 1502.21 and "Tiering" per 40 CFR Part 102.20 to reduce the volume of this SEA.

Considering these regulations and guidance, land use/zoning was eliminated from in-depth analysis because potential impacts were considered negligible, nonexistent, and/or sufficiently addressed in the 2001 EA and therefore do not require further analysis in this SEA. Resource areas that are evaluated in further detail in this SEA include: aesthetics; air quality; cultural resources; geology, topography, and soils; hydrology and water quality; wildlife and habitat; noise; floodplains and wetlands; socioeconomic; community services; solid and hazardous materials; transportation and parking; utilities; environmental justice; and cumulative effects.

1.6 Decision Making

VA, as a federal agency, is required to incorporate environmental considerations into its decision-making process for the actions it proposes to undertake. This is done according to the regulations and guidance identified in this Section 1.0. As such, this SEA provides VA with the necessary analysis to address and support decision making for the Proposed Action and serves to:

- Inform the public of the possible environmental impacts of the Proposed Action and its considered alternatives, as well as methods to reduce these impacts,
- Provide for public, state, inter-agency, and tribal input into VA’s planning and evaluation,
- Document the NEPA process, and
- Support informed decision-making by the federal government.

As the decision document for this proposed federal undertaking, this SEA also identifies the actions to which VA would commit to minimize environmental effects, as required under NEPA, its implementing regulations from CEQ (40 CFR Part 1500-1508) and VA (38 CFR Part 26), and VA’s NEPA guidance (VA, 2010). The decision to be made is whether—having considered the potential physical, environmental, cultural, and socioeconomic effects—VA should implement the Proposed Action including, as appropriate, measures to reduce adverse effects.
2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

NEPA, and the regulations of CEQ and VA for implementing NEPA, require that an EA include a brief discussion of all reasonable alternatives, to include at least the Proposed Action and the No Action alternative. Accordingly, this section summarizes the process used to develop alternatives and provides a description of the subsequently selected Proposed Action and its alternatives, as well as alternatives considered but ultimately eliminated from further analysis, and the reasons for elimination.

2.1 Development of Alternatives

No reasonable alternatives that would adequately meet the purpose and need for action have been identified by VA. Therefore, the alternatives evaluated in this SEA are the Proposed Action and No Action. The Proposed Action is described in detail in the following Section 2.2. The No Action alternative serves as the baseline for determining the significance of potential effects of the Proposed Action in relation to existing conditions. A description of the No Action alternative is provided in Section 2.3.

2.2 Proposed Action

Under the Proposed Action, VA would implement potential expansions at NCOTA according to the 2018 Master Plan design (see Figures 2A and 2B). The Phase 3 expansion in the northern portion of the property would be constructed over the next two years and provide 13,500 new burial sites, while potential future expansion phases in the southern portion of the property would be constructed according to the design in the 2018 Master Plan; the need for future expansions would be evaluated by VA every 8-10 years.

The Proposed Action for the Phase 3 expansion includes the following elements:

- **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 cremain 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 cortège 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-compliant analyses would be completed prior to constructing any of these potential future expansion phases. The following elements include:

Burial Expansion
- The construction and operation of additional burial facilities to provide approximately 100 years of capacity on existing, undeveloped land. Based on the 2018 Master Plan, full buildout would require development of approximately 80 acres of currently unimproved land to provide approximately 50,900 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 expansion phase areas.
- Construction 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.
- Install irrigation system pump house and piping to support landscaped areas.
2.3 No Action Alternative

The No Action alternative serves as a benchmark against which the effects of the Proposed Action can be evaluated, as required under the CEQ Regulations (40 CFR Part 1502.14). For this project, No Action is defined as not implementing the Proposed Action and retaining conditions at NCOTA as they currently exist for the foreseeable future.

The No Action alternative would challenge NCA’s goal of continuing to provide eligible Veterans and their family members with reasonable access to VA burial options in southwestern Pennsylvania and, therefore, would not meet the purpose of and need for action.

Under the No Action alternative, long-term, reasonable access to burial benefits would not be provided to the estimated 285,000 Veterans living in southwestern Pennsylvania and their families (U.S. Census Bureau, 2018a). As previously described, the nearest National Cemeteries are more than approximately 70 miles away from southwestern Pennsylvania. Therefore, Veterans and their families residing in southwestern Pennsylvania would be underserved once NCOTA reaches full capacity in the near future. At that point, VA would not comply with the requirements of the Service Members Civil Relief Act. Furthermore, due to the distances between homes and the burial sites, the No Action alternative would result in a hardship for the survivors attending the funerals and for grave visitations of deceased Veterans interred in other National Cemeteries. If Veterans and their families must 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.

2.4 Alternatives Identified but Not Evaluated in Detail

During development of the 2018 Master Plan, several conceptual design alternatives were considered for the potential future expansion phases within the southern portion of the property to accomplish the 100-year plan to provide adequate burial for Veterans’ and their families (VA, 2018). These conceptual design alternatives included various alignments and phasing for burial areas, roadways, and irrigation systems, as depicted in Figure 3 and Figure 4.

These conceptual design alternatives did not utilize the southern area as efficiently or with fewer potential impacts (degree or intensity) compared to the select design presented in the 2018 Master Plan. Therefore, these conceptual design alternatives are not further evaluated in detail in this SEA.
Figure 3. Alternative 2 - Southern Expansion
Figure 4. Alternative 3 - Southern Expansion
3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.1 Criteria for Analysis of Impacts

This section describes the existing conditions at NCOTA and presents an analysis of the potential environmental consequences of implementing the Proposed Action and the consequences of selecting the No Action alternative. Each alternative was evaluated for its potential impacts on physical, biological, and socioeconomic resources in accordance with CEQ guidelines at 40 CFR Part 1508.8.

The specific criteria for evaluating the potential environmental impacts of the Proposed Action and the No Action alternative are described in the following sections. The significance of an action is also measured in terms of its context and intensity. The context and intensity of potential environmental impacts are described in terms of duration, whether they are direct or indirect, the magnitude of the impact, and whether they are adverse or beneficial, as summarized in the following paragraphs:

**Short-term or long-term.** In general, short-term impacts are those that would occur only with respect to a particular activity, for a finite period, or only during the time required for construction or installation activities. Long-term impacts are those that are more likely to be persistent and chronic.

**Direct or indirect.** A direct impact is caused by an action and occurs around the same time at or near the location of the action. An indirect impact is caused by an action and might occur later in time or be farther removed in distance but still be a reasonably foreseeable outcome of the action.

**Less-than-significant (negligible, minor, moderate), or significant.** These relative terms are used to characterize the magnitude or intensity of an impact. Negligible impacts are generally those that might be perceptible but are at the lower level of detection. A minor impact is slight, but detectable. A moderate impact is readily apparent. Significant impacts are those that, in their context and due to their magnitude (severity), have the potential to meet the thresholds for significance set forth in CEQ regulations (40 CFR Part 1508.27) and, thus, warrant heightened attention and examination for potential means for mitigation to fulfill the policies set forth in NEPA. Significance criteria by resource area are presented in the following sections.

**Adverse or beneficial.** An adverse impact is one having unfavorable or undesirable outcomes on the man-made or natural environment. A beneficial impact is one having positive outcomes on the man-made or natural environment.

3.2 Resources Not Evaluated in this SEA

VA determined that the land use/zoning and utilities technical resource areas were sufficiently analyzed in the Final EA for site selection (VA, 2001) and the 2015 Supplemental SEA for the northern expansion phase (VA, 2015); therefore, these resources do not warrant further analysis in this SEA. Additional rationale for excluding additional analysis of these topics is provided below:

- **Land use and Zoning** – In 2001, the Morgan family sold Morgan Farms, the property currently known as NCOTA, to VA (VA, 2001). The zoning designation was R1 (low-density residential) and agricultural land use. The property currently remains as R1 designation. Following this purchase by VA, the land use designation was approved as a “conditional use” since Cecil Township does not have a zoning district designated for a cemetery (VA, 2001). However, the “conditional use” was intended for use as a...
cemetery, and thus the zoning changed from agricultural to cemetery land use. The current land use designation for NCOTA remains as conditional use and will remain in use for a cemetery through the implementation of the Proposed Action and for the foreseeable future while VA retains ownership of the property.

3.3 Aesthetics

3.3.1 Existing Environment

A combination of natural and built features influences and contribute to the aesthetic environment of an area. Natural features may include topography and vegetation, which themselves may have been altered over time by human action, while built features can include buildings and other constructed elements. Beneficial or adverse impacts may occur depending on how changes to the existing aesthetic environment are perceived by human receptors, which can include visitors and residents living adjacent to and in the vicinity of the area. Features surrounding NCOTA that contribute to the visual character and scenic quality of the area include rolling hills, agricultural fields, forested areas and distinctive houses and barns. The vegetation is predominately pasture and cultivated fields.

The existing topography of NCOTA consists of sloping hills ranging from 1,300 feet above mean sea level (amsl) at the highest point to 1,050 feet amsl at the lowest point. Topography is analyzed in further detail in Section 3.6.

The northern portion of NCOTA property containing the Phase 1 cemetery has a park-like setting with professionally manicured grounds, winding interior roadways, and few small buildings with regionally-consistent architectural design. There are no designated wild and scenic rivers or scenic roadways at or in the vicinity of NCOTA.

The southern portion of NCOTA property (south of Morgan Road) generally has not been improved and is characterized as a pasture with rolling to steep hills. A small historical cemetery and a wetland/stream channel is present near Morgan Road. A satellite maintenance building is also present near the center of the southern portion of the property.

NCOTA is visible along its eastern border to vehicles travelling on I-79. NCOTA is also visible along Morgan Road which bisects the property, and along County Lane Road, which is located along the northwestern border of the property.

NCOTA is accessible to visitors from a formal main entrance located near the eastern end of Morgan Road, while staff use a maintenance entrance located to the west of the main entrance.

3.3.2 Environmental Consequences

3.3.2.1 Proposed Action

Construction. During construction of the Phase 3 expansion, construction-related equipment would be present on the northern portion of the property, and in the southern portion where the ring-road is proposed near Morgan Road. Construction would require the use and presence of heavy construction equipment used for grading burial sections, road construction, and other minor improvements. The heavy equipment phase of construction is anticipated to require no more than a total of 18 months and would not necessarily be one continuous period. The presence of heavy equipment and unfinished stages of site preparation and construction would temporarily impact the visual quality of the northern portion of the cemetery, particularly near the existing northern columbarium and committal shelter. However, the majority of the Phase 3 expansion would be
located northeast of and generally out of view of the existing Phase 1 cemetery. Where construction activities would be visible to visitors within the Phase 1 cemetery, the construction contractor would erect temporary privacy fencing. Therefore, it is not anticipated that construction activities would disrupt ongoing memorial services within the Phase 1 cemetery.

The remainder of the potential future expansions would occur in the southern portion of the property. Construction would require heavy machinery for grading, earthwork, road construction, and crypt placement. Each development phase would permanently convert a portion of the unmanaged rural area to a National Shrine with manicured grounds having a park-like appearance. Additionally, each potential future expansion phase would be constructed away from the prior phase. This approach would minimize visual impacts to memorial services occurring at previously constructed burial areas. As needed, the construction contractor would erect temporary privacy fencing to further minimize potential adverse aesthetic impacts on visitors.

Land clearing and grading activities would expose underlying soils and increase the potential for fugitive dust generation to the air and mud/dirt on the cemetery roadways and Morgan Road which could lead to nuisance concerns about the construction activities at NCOTA. To minimize these potential adverse impacts, the construction contractor would implement industry-standard construction Best Management Practices (BMP) to limit fugitive dust generation and tracking of mud/dirt onto roadways. These BMPs include 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. Additionally, land clearing and grading activities would occur only within the area designated for expansion for each specific phase, while all other potential future expansion areas would remain vegetated until the subsequent expansion. Following grading, the contractor would plant native, non-invasive, drought-tolerant vegetation on exposed soils. Furthermore, the 2018 Master Plan design limits or avoids clearing of existing trees along the property’s borders with private landowners and I-79, and avoids any clearing in the “natural preserve” area in the northern portion of the property. Retaining these wooded areas and the preservation area further minimizes the visual impact of construction activities to nearby residents and passersby.

These minimization measures and BMPs would ensure that Proposed Action construction activities would have a temporary short-term, direct, less-than-significant adverse impact on aesthetics.

**Operation.** 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 NCOTA’s National Shrine appearance, with elements including professionally-maintained landscaped grounds, winding roadways, and retention of the natural undulating topography.

Operations within the expansion phases would include regularly scheduled professional landscape maintenance to ensure the upkeep of the park-like appearance of the cemetery grounds and associated physical infrastructure (e.g. roads, buildings). The maintenance would be conducted on a schedule to limit potential disruptions to committal services. No new night-time lighting would be required (current light is limited to illumination of the flagpole, the main entrance road, and security lighting around the buildings). These operational maintenance activities would not have an adverse impact on aesthetics.
Management practices to limit and further reduce the potential less-than-significant adverse impacts, and maintain the beneficial impacts, are summarized in Section 6.0 in this SEA.

3.3.2.2 No Action

Under the No Action alternative, no changes to the current aesthetic or visual character of the grounds would occur at NCOTA.

Although the less-than-significant adverse impacts associated with construction of the Proposed Action would be avoided, the beneficial impacts to aesthetics associated with operations would not occur. Baseline conditions would remain, as described above.

3.4 Air Quality

3.4.1 Regional Climate

Weather and climate are important influences on air resources. The NCOTA is located in Washington County, approximately 115 miles south of Lake Erie and at an elevation of approximately 1,100 to 1,200 feet amsl. The average summer (July) temperature is 71.4 degrees Fahrenheit (°F) with approximately 4.33 inches of rainfall, and in winter (January) is 27 °F with approximately 2.86 inches of precipitation. July is the wettest month and November is the driest (average 2.66 inches of rainfall) (NOAA, 2018).

3.4.2 Air Quality Standards

National Ambient Air Quality Standards. The Clean Air Act (CAA) and its subsequent amendments require the USEPA to establish the National Ambient Air Quality Standards (NAAQS) for pollutants that may endanger public health or welfare. The USEPA has promulgated primary and secondary NAAQS for six criteria pollutants including carbon monoxide (CO), nitrogen dioxide (NO2), ozone (O3), lead (Pb), particulate matter (PM; particulate matter sized 10 microns or less (PM10) and particulate matter sized 2.5 microns or less (PM2.5), and sulfur dioxide (SO2). Primary standards set limits to protect public health, and secondary standards set limits to protect public welfare. The CAA also gives the authority to states to establish air quality rules and regulations stricter than the federal standards.

Washington County, PA, is under the jurisdiction of the PA DEP Bureau of Air Quality Control Region (AQCR) 5 and USEPA Region 3. The USEPA defines AQCRs, which are used to evaluate compliance with the NAAQS per the CAA. The NCOTA property is specifically located within the Pittsburgh-Beaver Valley AQCR. Pennsylvania has developed Air Quality State Implementation Plans (SIP) that outline regulations, control measures, and strategies to achieve compliance with NAAQS (PA DEP, 2014).

The General Conformity Rule (GCR) (CAA Part 176(c)(4)) applies to all federal actions in nonattainment or maintenance areas. This rule requires that any federal action meet the requirements of a SIP or Federal Implementation Plan. More specifically, CAA conformity is ensured when a federal action would not cause a new violation of the NAAQS; contribute to an increase in the frequency or severity of violations of NAAQS; or delay the timely attainment of any NAAQS, interim progress milestones, or other milestones toward achieving compliance with the NAAQS. AQCRs that comply with the NAAQS are designated “attainment” areas by the USEPA, while areas where the standards are not met are designated as “non-attainment” areas.
The Pittsburgh-Beaver Valley AQCR is designated as in compliance for all criteria pollutants, with the exception of O₃ (marginal non-attainment) (USEPA, 2018). (The O₃ is likely attributed to vehicle emissions and other industrial processes within the more industrialized areas located within the AQCR.) Therefore, the potential emissions associated with the Proposed Action are required to be compared to the GCR de minimis thresholds. If the Proposed Action emissions are below the thresholds, then a full Conformity Determination is not required.

3.4.3 Existing Emissions Sources

Current emissions sources at NCOTA include petroleum-powered boilers that provide heat and air conditioning at the existing administration and maintenance buildings, from gasoline- or diesel-fueled maintenance vehicles, and from two gasoline-fueled generators for emergency backup electrical power. No large sources of regulated air emissions exist on the property; therefore, VA, as the owner of the property, is not required to have a Title V operating permit.

3.4.4 Sensitive Receptors

CEQ’s NEPA regulations require evaluation of the degree to which the proposed action affects public health (40 CFR Part 1508.27). Children, elderly people, and people with illnesses are especially sensitive to the effects of air pollutants; therefore, hospitals, schools, convalescent facilities, and residential areas are considered to be sensitive receptors for air quality impacts, particularly when located within 1 mile from the emissions source.

The nearest residential area is a low-density area that borders the northwest boundary of the property along County Line Road. There are no schools or hospitals within one mile of NCOTA. There is one religious institution, “Lakeview Christian Life Church,” located 0.3 miles east of NCOTA on Washington Pike in a medium-density residential neighborhood (NEPAssist, 2018).

3.4.5 Environmental Consequences

The impacts on Air Quality are determined based on any increases in emissions of regulated pollutants compared to the existing conditions. The impacts on air quality are evaluated on the basis of the Proposed Action exceeding the de minimis threshold established by USEPA in the GCR.

3.4.5.1 Proposed Action

Construction. Construction of the Phase 3 expansion would require up to approximately 18 months of earthwork activities associated with grading, roadway realignment and construction, and installation of pre-placed crypts. The construction of each of the next 10 potential future expansion phases within the 80-acre portion of the southern area would likely require 18-24 months to complete; each phase would cover approximately 8 acres.

Construction of any of the expansion phases would require heavy equipment with petroleum-burning engines, resulting in emissions of criteria pollutants (with the exception of lead, which is no longer an additive in these fuels). Construction would also generate particulate matter into the air from activities including grading of areas (exposing soils) and vehicles traveling on paved and unpaved surfaces. The amount of particulate emissions can be estimated from the amount of ground surface exposed, the type and intensity of activity, soil type and conditions, wind speed, and dust control measures used.
As described in Section 3.3, construction BMPs generally including water or chemical dust suppression would be implemented to reduce fugitive dust generation and prevent it from becoming airborne.

An estimate of the emissions associated with construction of the Phase 3 expansion was calculated and used as a conservative representative of emissions that would be emitted during each separate potential future expansion phase. These estimates are presented in the following tables in Section 3.4.

Total suspended particulates were calculated using the emission factor for heavy construction activity operations from “AP-42, Compilation for Air Pollutant Emission Factors” (USEPA, 1995), to provide a conservative estimate of PM emissions. Estimates are shown in Table 2. Total Suspended Particulates.

Table 2. Total Suspended Particulates

<table>
<thead>
<tr>
<th>Total Area (acres)</th>
<th>Exposed Area (acres)</th>
<th>Construction Duration (months)</th>
<th>Emission Factor (tons/acre/month)</th>
<th>Control Efficiency (%)</th>
<th>Total Suspended Particulate Emissions (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>25</td>
<td>25</td>
<td>18</td>
<td>1.2</td>
<td>80%</td>
<td>72</td>
</tr>
<tr>
<td>105 (80 acres total)</td>
<td>8 per phase</td>
<td>18</td>
<td>1.2</td>
<td>80%</td>
<td>23</td>
</tr>
</tbody>
</table>

Non-road construction vehicles would emit criteria pollutants during construction of the Phase 3 expansion and each subsequent phase. Based on the Phase 3 expansion, criteria pollution emissions from construction equipment were calculated assuming the use of six backhoes, two graders, and two bulldozers operating for approximately eight hours per day for a total of 390 weekdays (approximately 18 months). Emissions were estimated using “Off-Road – Model Mobile Source Emission Factors” from the California South Coast Air Quality Management District (SCAQMD, 2018) because Pennsylvania and federal USEPA emission factors are not available. Table 3 through Table 5 show estimated annual emissions, projected equipment operating hours, and equipment emission factors, while Table 5 shows the total emissions for the 18-month construction period. Emissions of Sulfur Oxides (SOx), lead, nitrous oxides (NOx), volatile organic compounds (VOC), and CO, are below de minimis thresholds; therefore, a General Conformity Determination is not required.

Table 3. Estimated Total Operational Hours for Construction Equipment

<table>
<thead>
<tr>
<th>Equipment Type</th>
<th>Number</th>
<th>Hours/Day</th>
<th>Total Days</th>
<th>Total Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grader</td>
<td>2</td>
<td>8</td>
<td>390</td>
<td>6,240</td>
</tr>
<tr>
<td>Tractors/Loaders/Backhoes</td>
<td>6</td>
<td>8</td>
<td>390</td>
<td>18,720</td>
</tr>
<tr>
<td>Rubber Tired Dozers</td>
<td>2</td>
<td>8</td>
<td>390</td>
<td>6,240</td>
</tr>
</tbody>
</table>
As shown in Table 5, construction emissions associated with the Phase 3 expansion, the largest of all of the proposed phases under the Proposed Action, would be below the General Conformity de minimis thresholds. Likewise, each of the subsequent potential future expansion phases, which are similar to the Phase 3 expansion, would not exceed the de minimis thresholds either.

Construction of expansion areas is not anticipated to require importing or exporting fill. Transporting fill can often require hundreds or thousands of truck trips to and from a construction site. Therefore, without a need to transport fill, fewer on-road construction vehicles would travel to and from the expansion areas. These on-road vehicles would be associated with delivering construction materials (stone, asphalt, concrete) to the expansion areas. These on-road vehicle activities would have a negligible contribution to the overall emissions during construction.

To further minimize construction-related air emissions impacts, the following BMPs would be implemented in addition to those previously mentioned in Section 3.2:

- Utilize appropriate construction scheduling (avoid earthwork during extremely windy and dry periods).
- Stabilize exposed soil with vegetation or mulching to minimize erosion and potential dust generation.
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.

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.

Visually monitor construction activities on a daily basis, and particularly during extended periods of dry weather; implement additional dust control measures as needed.

Management practices to reduce potential adverse impacts are summarized in Section 6.0 in this SEA.

**Operation.** Operational sources of air emissions would include visitors’ vehicles and NCOTA maintenance equipment (mowers, backhoes, power washers, etc.). The Proposed Action would result in an increase in visitor vehicle traffic and maintenance equipment operations with each new expansion phase. This increase in vehicle volume and equipment usage would lead to a negligible increase in emissions. To further minimize emissions from operational maintenance activities, the maintenance equipment would be kept in good working order.

Operation of the Proposed Action would extend the longevity of NCOTA, which would increase visitor traffic. While emissions from visitor traffic would marginally increase in the immediate area of NCOTA, these visitors and families would not be required to travel the longer distances to reach other National Cemeteries outside of the southwestern Pennsylvania region, as they would under the No Action alternative.

Therefore, operation of the Proposed Action would result in long-term, direct, negligible adverse impacts on air quality.

**3.4.5.2 No Action**

Under the No Action alternative, there would be no short-term changes in air quality compared to current conditions. However, emissions associated with visitors and families would begin to increase once capacity was reached within the Phase 1 cemetery at NCOTA, as these groups would be required to travel greater distances to reach a National Cemetery outside of the southwestern Pennsylvania region.

**3.5 Cultural Resources**

**3.5.1 Existing Environment**

Section 106 and Section 110 of the *National Historic Preservation Act of 1966*, as amended (NHPA) (Pub. L. 89-655, 16 USC 470 et seq.), ensures that federal agencies consider cultural resources, defined as any prehistoric or historic district, site, building, structure, or object eligible for inclusion on the National Register of Historic Places (NRHP), in their proposed programs, projects, and actions prior to initiation.

A 2003 Phase I Cultural Resources Survey and a 2004 Phase II Archaeological National Register Evaluation have been previously conducted for the entire NCOTA property, inclusive of the Proposed Action expansion areas. The goals of these studies were to: (1) determine the presence or absence of previously identified archaeological or historic architectural resources in the
project’s area of potential effect (APE); (2) identify in preliminary fashion the presence of any historic architectural resources within the APE that are potentially eligible for inclusion in the NRHP; and (3) establish the potential of the project APE to contain archaeological sites not previously identified. All work was performed pursuant to the NHPA and the ACHP’s “Protection of Historic Properties” (36 CFR Part 800). This work was also conducted pursuant to the PHMC, Bureau of Historic Preservation (BHP) Guidelines for Archaeological Investigations (1991), and the Pennsylvania History Code (37 Pa. C.S.A. Section 101 et seq.).

The 2003 Phase I investigation consisted of an examination of all documents for the project tract and adjacent areas on file at the Pennsylvania Historical and Museum Commission’s (PHMC) SHPO and the Carnegie Museum of Natural History. The Phase I investigation methodology included surface surveillance, ground penetrating radar (GPR), surface collection, and the excavation of shovel test pits.

Background research conducted in association with the Phase I investigation revealed two historic properties that are over 50 years old: the William D. Morgan Farmstead and the Robert L. Morgan Farmstead (both determined not eligible for the NRHP); and two previously recorded archaeological sites: the Morgan Site [36WH417], a prehistoric archaeological site of unknown cultural affiliation; and the Tombstone Site [36WH153], a small, 1782 historic family cemetery with a prehistoric component located approximately 250-feet south of Morgan Road (see Figure 5).

The field survey for the 2003 Phase I investigation identified six cultural resources: the two previously recorded historic farmsteads; the two previously recorded archaeological sites (36WH153; 36WH417); and two newly identified prehistoric archaeological sites (36WH1371; 36WH1372). During the 2003 Phase I investigation, the Tombstone Site (36WH153) was identifiable by four inscribed granite monuments on a plot that measured approximately 66 feet by 66 feet. The inscriptions on the granite monuments identify a total of 64 individuals who were interred there between 1787 and 1836. Based on the results of the GPR, a high probability exists that human burials are located beyond the boundaries marked by the granite markers. The GPR identified an area of disturbance of irregular shape measuring 150 feet by 150 feet (VA, 2015). VA excluded the Tombstone Site (36WH153) from all future ground disturbing activities and stated this commitment, which was subsequently acknowledged and agreed upon by the PHMC/BHP in a letter dated December 16, 2003 (VA, 2015). Accordingly, the 2018 Master Plan continues to adhere to this commitment by including a 75-foot setback from the Tombstone Site boundary to avoid disturbance to potential previously undocumented gravesites associated with this family cemetery (see Figure 6).

The 2004 Phase II Archaeological National Register Evaluation was conducted to evaluate the NRHP eligibility for these sites. Based on the Phase II Archaeological Evaluation, the Morgan Site (36WH417), Morgan #2 Site (36WH1371) and Morgan #3 Site (36WH1372), were determined not to be eligible for listing on the National Register for Historic Places. No further work was recommended (VA, 2015). The PHMC/BHP concurred in a letter dated October 13, 2004, that the three sites were not eligible for listing on the NRHP, and that no further archaeological work was necessary.

Additional background research conducted in May 2018 in support of the current Proposed Action revealed no additional cultural resources have been recorded on the property since the 2003 Phase I Archaeological Survey or the Phase II Archaeological Evaluation. Based on this information,
VA concluded that the Proposed Action would have no adverse effect on historic properties. VA requested concurrence from the SHPO in a letter dated October 11, 2018. On November 21, 2018, the SHPO concurred that the Proposed Action will have no adverse effect on archaeological or above-ground resources. Copies of this correspondence are included in Appendix B.

Figure 5. Tombstone Site (36WH153) Location
Figure 6. Proposed Action: 2018 Master Plan Detail for the Tombstone Site and Setback
Native American Resources and Consultation.

For all federally proposed actions, federal agencies are required to consult with federally-recognized Native American Tribes in accordance with NEPA, the NHPA, the *Native American Graves Protection and Repatriation Act* (NAGPRA), Executive Order (EO) 13007, *Indian Sacred Sites*, and EO 13175, *Consultation and Coordination with Indian Tribal Governments*. Based on a review of the U.S. Department of the Interior Bureau of Indian Affairs, there are no federally-recognized Native American Tribes in Pennsylvania. However, although not required to, during the prior EAs (VA, 2001; VA, 2015), VA contacted state and local Native American tribes having potential interest in the project area.

During the preparation of the 2015 SEA, the Delaware Tribe of Indians concurred that the previously identified Tombstone Site should be avoided. Furthermore, they concurred that the “project site” (the entire NCOTA property) had been extensively disturbed and that the potential for disturbing additional cultural resources was low, and they therefore had no objections to the project as it was proposed in 2015 (VA, 2015). The Delaware Tribe of Indians stated that if any archaeological remains (artifacts, subsurface features, etc.) were discovered during the construction process, construction would be halted until an archaeologist can view and assess the findings. Furthermore, if any human remains were accidentally unearthed during the course of the project, development would immediately cease and the Delaware Tribe of Indians would be informed of the inadvertent discovery. VA concurred with this statement as part of the 2015 Final SEA and FONSI (VA, 2015). As previously stated, the 2018 Master Plan takes into account the Tombstone Site and includes a 75-foot setback from the private cemetery boundary to avoid disturbance to potential previously undocumented gravesites associated with this family cemetery. As such, VA has concluded further consultation regarding the Proposed Action is not warranted.

Additionally, as noted in the prior EAs (VA, 2001; VA, 2015), no Traditional Cultural Properties or Native American sacred places are currently known to exist within NCOTA property (VA, 2001; VA, 2015).

### 3.5.2 Environmental Consequences

#### 3.5.2.1 Proposed Action

**Construction and Operation.** Based on the low probability of cultural resources existing at the property, and considering the results of the Phase I Cultural Resources Survey and the Phase II Archaeological Evaluation, VA does not anticipate that any significant cultural resources exist. No known cultural resource sites are located within the specific construction footprint of the Phase 3 expansion area, and the area does not contain any locations of high elevation or undisturbed locations with moderate-to-high potential for cultural resources. The Pennsylvania Historical and Museum Commission, Bureau for Historic Preservation confirmed based on a review of survey files, which include both archaeological sites and standing structures, that there are no National Register eligible or listed historic or archaeological properties in the area of this property.

The design of the potential future expansion phases in the southern portion of the property entirely avoids the private cemetery (Tombstone Site) and includes an additional 75-foot setback around its perimeter. Therefore, VA concluded that the Proposed Action would have no adverse effect on cultural resources. As previously discussed, the SHPO concurred with this finding in a letter to VA dated November 21, 2018 (a copy of the correspondence is provided in Appendix B).
However, some potential exists for disturbance of potentially unknown archaeological resources during future construction and excavation actions. To minimize impacts to otherwise unknown resources that may be uncovered during construction, VA would comply with the NHPA, Archaeological Resources Protection Act of 1979 (ARPA), NAGPRA, American Indian Religious Freedom Act (AIRFA), 36 CFR Part 79, and EO 13007.

Additionally, VA would implement an “Inadvertent Discovery” plan. Under this plan, if prehistoric or historic artifacts that could be associated with Native American, early European, or American settlement are encountered at any time during construction or operation of the expansion areas, VA would cease all activities involving subsurface disturbance in the vicinity of the discovery. Should human remains or other cultural items, as defined by NAGPRA, be discovered during project construction, the construction contractor would immediately cease work until VA, a qualified archaeologist, the Delaware Tribe, and the SHPO, are contacted to properly identify and appropriately treat discovered items in accordance with applicable state and federal law(s).

Implementation of these measures would ensure that potential impacts on cultural resources are maintained at long-term, direct, less-than-significant adverse levels.

3.5.2.2 No Action

The No Action Alternative would result in no impact on cultural resources because expansion would not occur, leaving potential unknown cultural resources undisturbed.

3.6 Geology, Topography, and Soils

This section presents an overview of the geology, topography, and soils encompassing the proposed expansion area; this encompassing area is defined as the “Project Study Area” in this section. Additional descriptions of these resources can be found in the 2001 EA, which presents additional background information on the geology, topography, and soils at NCOTA, as well as analysis of impacts and BMPs associated with site selection and potential full buildout (VA, 2001). Updated information is presented below, where applicable.

3.6.1 Existing Environment

Geology

The NCOTA property is located in an area that has a history of subsurface coal mining, which increases the risk of mine subsidence. However, no indications of subsurface mine subsidence were found during a survey for subsidence at the property, and future risks associated with mining were determined to be minimal (VA, 2001). Additionally, the gently sloping terrain of the property further reduces future subsidence risks, which increase with steep topography.

Historical subsurface coal mining can also increase hazards related to landslides. Earthflow and slumping are two legacy issues from mining in Washington County. However, the property was found to lack the primary contributing factors related to mining-related landslides, including steeply sloping terrain, barren soil, and exposed bedrock (VA, 2001).

Additional geotechnical information about the property was obtained during geotechnical investigations completed in 2014 in the northern area, and in October 2017 in the southern area. The boring information indicated that bedrock, typically encountered as weathered shale, was present at depths as shallow as approximately 5- feet bgs, with auger refusal (likely representing competent bedrock) at depths ranging from approximately 8- to 72- feet bgs.
Sinkholes can be common where subsurface rock formations are comprised of limestone, carbonate rock, or other surfaces that can be dissolved by groundwater. According to the Pennsylvania Department of Conservation and Natural Resources shapefiles (PADCNR, 2009), there is no karst topography, sinkholes, or depressions within the proposed expansion areas. Additionally, the prior geotechnical investigations involving subsurface borings and test pits did not identify any karst or sinkholes.

**Topography**

The topography of the property features rolling hills, with slopes generally ranging from 2% to 15%, with few localized slopes of up to 33%. Section 10.6 (Grading Guidelines) from the latest NCA Design Guidelines (November 2016) requires that interment areas be located on slopes of 15% or less. These same design guidelines establish a maximum slope of 25% for mowed slopes.

The highest elevation is 1,303 feet above mean sea level (amsl) and the lowest elevation is 1,051 feet amsl (U.S. Geological Survey [USGS], 1985). The property generally slopes in a southeastern direction toward I-79. The topography across the northern portion of the property slopes downward from west to east, ranging from approximately 1280-1120 feet amsl, and slopes upwards north to south, ranging from approximately 1090-1200 feet amsl. The existing topography across the southern portion of the property slopes generally upward north to south, ranging from approximately 1,100-1,160 feet amsl, and slopes downward west to east, ranging from approximately 1,220-1,080 feet amsl.

**Soils**

Soil information was obtained from the United States Department of Agriculture – Natural Resources Conservation Service (USDA-NRCS, 2018). The Project Study Area includes soils of the Dormont-Culleoka association. These soils are generally moderately well drained to well drained, and moderately deep to deep-with-a-gently-sloping-to-steep topography. Dormont soils predominate on hillsides and have a seasonal high-water table depth of 2 to 2.5 feet. Culleoka soils predominate on ridges and hilltops and are generally deep and well drained. Based on the USDA-NRCS mapping, Dormont silt loam, 15 to 25 percent slopes (DoD), and Fluvaquents, loamy (Fa), are classified as hydric soils (Figure 7). Table 6 summarizes the acreage of the mapped soil units within the Project Study Area. A description of each mapped soil unit is provided in the following list.

- **Brooke silty clay loam (BoB)**: The Brook series consists of moderately deep and well drained soils with slopes ranging from 3 to 8 percent. Brooke soils are found on hills. Parent material is clayey residuum weathered from limestone and shale. The available water to a depth of 60 inches in Brooke soils is low. There is no zone of water saturation within a depth of 72 inches. This soil does not meet hydric criteria.

- **Culleoka channery silt loam (CaB, CaC, and CaD)**: The Culleoka series consists of moderately steep, well drained soils with slopes ranging from 3 to 25 percent. Culleoka soils are found on hills in uplands. Parent material is fine-loamy residuum weathered from sandstone and shale. The available water to a depth of 60 inches in Culleoka soils is low. There is no zone of water saturation within a depth of 72 inches. These soils do not meet hydric criteria.

- **Dormont silt loam (DoB, DoC, and DoD)**: The Dormont series consists of deep and moderately well drained soils with slopes ranging from 3 to 25 percent. Dormont soils are...
found on hills in uplands. Parent material is fine-loamy residuum weathered from limestone, sandstone, and shale. The available water to a depth of 60 inches in Dormont soils is moderate. A seasonal zone of water saturation is at 31 inches during January through April. These soils do not meet hydric criteria.

- **Fluvaquents (Fa):** The Fluvaquents series consists of deep and poorly drained soils with slopes ranging from 0 to 3 percent. Fluvaquents soils are found on flood plains. Parent material is alluvium. The available water to a depth of 60 inches in Fluvaquents soils is moderate. A seasonal zone of water saturation is at 6 inches during January through May and October through December. These soils meet hydric criteria.

- **Guernsey silt loam (GeB, GeC, and GeD):** The Guernsey series consists of deep and moderately well drained soils with slopes ranging from 3 to 25 percent. Guernsey soils are found on ridges on hills. Parent material is colluvium derived from limestone and shale over residuum weathered from limestone and shale. The available water to a depth of 60 inches in Guernsey soils is high. A seasonal zone of water saturation is at 22 inches during January through April. These soils do not meet hydric criteria.

**Prime Farmland**

The BoB, CaB, DoB, and GeB soils are prime farmland soils, and CaC, DoC, GeC, and WeB are identified as soils of statewide importance in Pennsylvania (NRCS, 2018). However, as part of the 2001 EA, VA previously documented the conversion of the 11 acres of prime farmland and 56 acres of farmland of statewide importance at the property from agricultural to cemetery land use in the USDA Farmland Conversion Impact Rating Form AD-1006 (VA, 2001). Although the impact rating suggested the impact from conversion should be avoided, no other suitable properties for a National Cemetery in southwest Pennsylvania were identified (VA, 2001). Therefore, conversion of farmland within the property was deemed unavoidable and sufficiently addressed in the 2001 EA (VA, 2001). As such, additional analysis of the conversion impact is not required for this Proposed Action.
Figure 7. Soil Types within the Proposed Action Project Study Area
### Table 6. USDA-NRCS Soils within the Project Study Area

<table>
<thead>
<tr>
<th>Soil Map Unit</th>
<th>Soil Map Unit Name</th>
<th>Drainage Class</th>
<th>Hydric (Y/N)</th>
<th>Acres within Project Study Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>BoB</td>
<td>Brooke silty clay loam, 3 to 8 percent slopes</td>
<td>Well drained</td>
<td>N</td>
<td>1.0</td>
</tr>
<tr>
<td>CaB</td>
<td>Culleoka channery silt loam, 3 to 8 percent slopes</td>
<td>Well drained</td>
<td>N</td>
<td>6.1</td>
</tr>
<tr>
<td>CaC</td>
<td>Culleoka channery silt loam, 8 to 15 percent slopes</td>
<td>Well drained</td>
<td>N</td>
<td>55.4</td>
</tr>
<tr>
<td>CaD</td>
<td>Culleoka channery silt loam, 15 to 25 percent slopes</td>
<td>Well drained</td>
<td>N</td>
<td>27.4</td>
</tr>
<tr>
<td>DoB</td>
<td>Dormont silt loam, 3 to 8 percent slopes</td>
<td>Moderately well drained</td>
<td>N</td>
<td>9.6</td>
</tr>
<tr>
<td>DoC</td>
<td>Dormont silt loam, 8 to 15 percent slopes</td>
<td>Moderately well drained</td>
<td>N</td>
<td>29.1</td>
</tr>
<tr>
<td>DoD</td>
<td>Dormont silt loam, 15 to 25 percent slopes</td>
<td>Moderately well drained</td>
<td>Y</td>
<td>3.2</td>
</tr>
<tr>
<td>Fa</td>
<td>Fluvaquents, loamy</td>
<td>Poorly drained</td>
<td>Y</td>
<td>4.6</td>
</tr>
<tr>
<td>GeB</td>
<td>Guernsey silt loam, 3 to 8 percent slopes</td>
<td>Moderately well drained</td>
<td>N</td>
<td>9.8</td>
</tr>
<tr>
<td>GeC</td>
<td>Guernsey silt loam, 8 to 15 percent slopes</td>
<td>Moderately well drained</td>
<td>N</td>
<td>8.9</td>
</tr>
<tr>
<td>GeD</td>
<td>Guernsey silt loam, 15 to 25 percent slopes</td>
<td>Moderately well drained</td>
<td>N</td>
<td>0.1</td>
</tr>
<tr>
<td>WeB</td>
<td>Weikert-Culleoka complex, 3 to 8 percent slopes</td>
<td>Somewhat excessively drained</td>
<td>N</td>
<td>0.4</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>155.9</strong></td>
</tr>
</tbody>
</table>

#### 3.6.2 Environmental Consequences

If a project would result in an increased geologic hazard or a substantial change in the availability of a geologic resource, it could have a significant effect. Such geologic and soil hazards would include, but not be limited to, seismic vibration, land subsidence, and slope instability.

**3.6.2.1 Proposed Action**

**Geology**

**Construction and Operation.** The Phase 3 expansion would require grading operations associated with roadway realignment and construction, and excavations for pre-placed burial crypts. The potential future expansion phases in the southern portion of the property would also require mass grading and excavation to create burial areas, roadways, and the potential irrigation pond. These activities would potentially encounter the upper surface of shallow, highly weathered bedrock, as well as denser bedrock, typically during crypt placement. Prior geotechnical investigations indicated that conventional excavation methods would be suitable for ripping the highly weathered bedrock, while special excavation techniques such as hammering or blasting could be required if excavations encounter denser layers of rock. Encountering and excavating into the underlying bedrock would not be considered by itself to be, or lead to, an adverse impact on the competency or environmental quality of bedrock at or in the vicinity of the construction areas.

The 2001 EA indicated that while coal mining had been conducted at and in the vicinity of the property (prior to purchase by VA), there was a negligible likelihood of subsidence once the property was developed as a cemetery (VA, 2001). This was due to the topography, overburden thickness of 320-540 feet, and lack of historical evidence of mine subsidence at or near the property (VA, 2001).
Therefore, construction and operation of the Proposed Action would have a short-term, direct, negligible adverse impact on geology.

**Topography**

**Construction.** Construction of the Phase 3 expansion would have a negligible adverse impact on the topography of the northern area because the majority of land disturbance necessary for the Phase 3 expansion previously occurred during the Phase 1 cemetery construction, including construction of roadways and preparation of future burial areas. The Phase 3 expansion would also realign a portion of the existing Phase 1 cemetery roadway to lessen its pitch, which would have a beneficial impact.

Construction of the potential future expansion phases in the southern portion of the property would require extensive grading. Cuts on the order of 0.5 feet to 17.0 feet below the existing ground surface and fills up to 9.0 feet may be required (VA, 2015b). The bottom of the proposed burial crypts would be set at approximately 8-feet below the final grading elevations. Additionally, the topographical slope of individual burial sections would generally be graded to less than 6%, and roads would be pitched no greater than 10%. Although grading would modify portions of the existing topography of the southern area, the overall natural undulating topography would be retained to the maximum extent practicable. Therefore, construction of the Proposed Action would have a long-term, direct, less-than-significant adverse impact on topography.

**Operation.** Operation of the Proposed Action would have no further impacts on topography.

**Soils**

**Construction.** Construction of the Phase 3 expansion and potential future expansion phases could adversely impact native soils through several mechanisms. The primary mechanism is during grading, which would remove the vegetation that otherwise stabilizes the underlying soil. Exposed soils that have not been compacted or restabilized with vegetation or hardscape may be susceptible to erosion by wind, temporarily increasing particulate matter (dust) in the area and creating adverse short-term health, visibility, and aesthetic impacts. Additionally, erosion from precipitation can potentially result in off-site discharges of sediment-laden runoff. Likewise, compaction can reduce the infiltration rate of the soil, leading to increased run-off potential and increased erosion of the down gradient surrounding soils.

To reduce the intensity of these potential adverse impacts on soil, a soil erosion and sedimentation control (SESC) plan would be completed by VA as part of the PA DEP General National Pollutant Discharge Elimination System (NPDES) Permit for submission to the Washington County Conservation District (WCCD). The SESC BMPs are referenced in the Pennsylvania Erosion and Sediment Pollution Control Manual (PA ESC Manual). Additionally, a stormwater management plan would also be prepared and implemented to reduce soil erosion; the stormwater management systems are referenced in the Pennsylvania Stormwater Best Management Practices Manual (PA BMP Manual). Stormwater management, along with sediment and erosion control, is regulated under Chapter 102 of Pennsylvania State Code (25 PA Code Ch.102). Under State Code, the PA DEP is authorized to delegate permitting responsibilities to the County level. For Washington County, PA DEP has delegated its review to the WCCD. Accordingly, separate plans and design reports for stormwater management and for sediment and erosion control will need to be prepared and submitted to the WCCD for their approval.
The construction contractor would be required to adhere to the terms of the NPDES permit, which would specify the BMPs to prevent and reduce soil erosion and sedimentation during construction, including the use of silt fences, reinforced silt fences, composite filter socks, stabilized construction entrance(s), temporary sediment traps, and erosion control blanketing. Additionally, exposed soils would be revegetating with temporary and/or permanent non-invasive vegetation as soon as construction conditions allow. These BMPs would also include the use of water-spray trucks to prevent dust emissions from disturbed soil and physically brushing soil off of construction vehicle tires prior to leaving the construction area, as needed.

Construction and operational vehicles and equipment could also accidentally release petroleum-based fluids (diesel, hydraulic fluid) that can degrade soil quality, if the release is not immediately remediated. To avoid such potential releases and impacts, construction equipment would be properly maintained in good working order and equipped with emergency spill kits. This would ensure that construction contractors are prepared to respond to an emergency release of petroleum-based fluids, contain the release, and prevent impacts to soil from occurring. Additionally, construction equipment would be refueled in designated maintenance areas with impervious surfaces to avoid potential soil impacts.

Based on the prior geophysical investigations conducted at the property, coal may be encountered during any additional grading for the Phase 3 expansion or potential future expansion phases. Coal may not be reused, and incidental coal extraction is regulated by PADEP (25 Pa. Code Section 86.6, Surface Mining Conservation and Reclamation Act). It is noted that the extraction of coal incidental to government-financed construction projects or government-financed reclamation projects may be exempt from the permitting requirements of Chapter 86 (PADEP Document Number 563-2000-003, effective August 4, 2007). However, any coal that is encountered would be removed and either disposed of off-site, or encapsulated on-site (using an impervious membrane) at NCOTA spoils area located on the eastern side of I-79. Prior to and following coal extraction, the construction contractor would notify PADEP and provide information about the volume of coal to be removed and the disposal method used. This approach would ensure there are no short- or long-term adverse impacts associated with coal handling and management during construction.

Therefore, by utilizing appropriate erosion and sedimentation BMPs and stormwater management BMPs, adherence to the terms of the PA DEP General NPDES permit, and proper coal management procedures, impacts from construction of the Proposed Action on soil would be minimized to short-term, direct, less-than-significant adverse levels.

**Operation.** During operation, soil impacts would be limited to excavation of topsoil for individual inground burial sites in designated burial sections. Excavated soil would be temporarily stockpiled and returned to the burial site from which it was obtained, and then sodded to prevent erosion. Any excess soil would be immediately removed from the interment area and stockpiled at NCOTA spoils area, where these soils would not be subject to further erosion. Additionally, scheduled maintenance of stormwater management systems would be performed to ensure that the systems are functioning properly, and soils are not eroded by stormwater run-off.

Therefore, operation of the Proposed Action would have a short-term, direct, negligible adverse impact on soils.
3.6.2.2 No Action

No changes to the site would occur from implementation of the No Action alternative; therefore, no impacts to geology, topography, or soils would occur. Baseline conditions would remain, as described above.

3.7 Hydrology and Water Quality

3.7.1 Existing Environment

3.7.1.1 Surface Water

This section analyzes the potential impacts on surface waters; a discussion of wetlands and floodplains is presented in Section 3.10. The surface waters of Washington County, Pennsylvania are tributaries to the Ohio River, which originates in Pittsburgh’s Point State Park at the confluence of the Allegheny River, flowing southward, and the Monongahela River, flowing northward. The NCOTA property is in the 296-square-mile Chartiers Creek Watershed, which eventually drains to the Ohio River.

The NCOTA property drains to the east and south to unnamed tributaries of Chartiers Creek. Surface water features at NCOTA property include two unnamed streams, neither of which are identified as PADEP Chapter 93 (Commonwealth of PA, 2018b) regulated streams. These surface water features are depicted on Figure 8. One unnamed perennial stream drains the northern portion of the property; the stream flows east through a culvert beneath I-79, then drains into an unnamed tributary of Chartiers Run Creek. The creek flows northeast into the Ohio River at mile marker 2.5.

A second unnamed perennial stream originates on the northern portion of the property near Morgan Road. This unnamed stream flows south through a 30” reinforced concrete culvert that crosses under Morgan Road, approximately 700-feet west of NCOTA main entrance. The stream then flows south, crosses under the gravel road leading to the satellite maintenance area, converges with McPherson Creek, and ultimately discharges into Chartiers Run Creek.

3.7.1.2 Groundwater

The 2001 EA presented a background discussion of groundwater conditions in Washington County (VA, 2001). That information remains unchanged for this SEA. Where newer site-specific information about groundwater conditions was available, it is incorporated into the following discussion.

The 2001 EA indicated that the depth to high water table underlying NCOTA property varied seasonally, ranging from 1.5-feet bgs, to greater than 6-feet bgs for up to nine months of the year, and added that soils with a high-water table of greater than 6-feet bgs covered much of the property (VA, 2001).

Subsequent to the 2001 EA, the 2014 and 2017 site-specific geotechnical investigations indicated that the depth to groundwater was observed in the northern portion of the property at 4-feet bgs (possible perched water table) and generally deeper than 12-feet bgs elsewhere. In the southern portion of the property, groundwater was observed at approximately 0.5-feet bgs (B-5) near the northwest boundary; 8-feet (PZ-5) near the southeast boundary; 9-feet bgs (B-35) near the northeast boundary; 16.5-feet bgs (PZ-9) near the center; and 18.8-feet bgs (B-26) near Morgan Road. Groundwater was generally not encountered above 10-feet bgs in the remaining borings and piezometers (shallow wells) advanced in the southern portion of the property.
Figure 8. Streams at and in the Vicinity of NCOTA
3.7.2 Environmental Consequences

3.7.2.1 Proposed Action

Surface Water

Construction. Stormwater runoff from areas under development can result in off-site problems including erosion and water quality degradation due to sedimentation and other non-point source pollutants. These impacts are greatest during construction periods when soils are present without any vegetative cover. Construction of the Phase 3 expansion and potential future expansion phases, particularly during grading, could result in these adverse effects occurring to surface water resources.

To minimize these potential adverse impacts, erosion and sediment controls and stormwater management systems would be implemented at the start of the construction process and continuously maintained. As previously described under the Soils heading in section 3.6, these BMPs would be specified in the PADEP General NPDES permit.

Additionally, the Phase 3 expansion and potential future expansion phases would be designed to comply with USEPA Technical Guidance on Implementing the Stormwater Run-off Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act (EISA) (USEPA, 2009a) to the maximum extent technically feasible through engineering and design controls, such as minimizing the creation of new impervious surfaces, directing stormwater runoff to designated storage basins, and allowing precipitation to infiltrate into the ground surface to the maximum extent possible.

Similarly, the design for the Proposed Action expansion phases would adhere to the PA Stormwater BMP Manual guidelines and regulations, which indicates that there should not be an increase in post-development runoff volume for all storms equal to or less than the 2-year/24-hour storm event. The PA Stormwater BMP Manual also indicates that the post-development peak rate of discharge for the 1-year through 100-year events should not exceed the pre-development peak rates. Additionally, the composite efficiency of the proposed stormwater BMPs shall provide an 85% reduction in post-development particulate associated pollutant load, an 85% reduction in post-development total phosphorus loads, and a 50% reduction in post-development solute loads. VA would construct stormwater management systems that adhere to these design requirements, such that operation of the Proposed Action would not have a significant adverse impact on stormwater management and surface water quality. Stormwater management practices may also include the construction of infiltration basins and trenches, bioretention basins, vegetated filter strips, and vegetated swales.

Similar to soil impacts, a release of petroleum-based fluids from construction equipment could adversely impact surface water or groundwater quality. As such, construction equipment will be properly maintained in good working order and equipped with emergency spill kits. This would ensure that construction contractors are prepared to respond to a release of petroleum-based fluids (diesel, hydraulic fluid) to surface water or groundwater. Additionally, construction equipment would be refueled in designated impervious areas away from surface water resources.

Therefore, construction of the Proposed Action would have a short-term, direct, less-than-significant adverse impact on surface water.
Operation. Operation of the Proposed Action would generate stormwater run-off from the new impervious surfaces, namely the new roadways and other hardscapes. For the Phase 3 expansion in the northern portion of the property, stormwater run-off would be captured in the existing closed drainage system and discharged to eleven (11) level spreaders located throughout the northern portion of the property. The level spreaders promote sheet flow of the captured runoff and reduce erosion and channelization at the discharge locations. However, as previously described, improvements would be made to the existing stormwater management system and/or new stormwater management systems would be constructed and properly maintained to treat additional impervious areas, as well as to manage the anticipated increase in stormwater run-off rate and volume.

Stormwater associated with potential future expansion phases in the southern portion of the property would infiltrate into the ground, be directed to the proposed irrigation pond (up to 1.5 acres in area), or managed according to one or more of the practices described above.

Additionally, vegetation in landscaped areas would be maintained to prevent exposure of underlying soils. These design features and stormwater management measures would minimize the potential for sedimentation of run-off, which could adversely impact surface water resources.

During operation, pesticide/herbicide applications (as part of routine maintenance activities) and the use of road deicing chemicals during the winter would be performed to the minimum extent necessary and in accordance with manufacturer specifications, resulting in minimal impacts to surface water and groundwater resources.

Therefore, operation of the Proposed Action would have a long-term, direct, negligible impact on surface water quality.

Groundwater

Construction. Construction activities that require deep excavations/cutting may encounter perched groundwater within or above fine-grained soils at NCOTA property. However, groundwater is likely present at depths greater than 20-feet bgs in the northern portion of the property and greater than 10-feet bgs throughout much of the southern portion of the property. Therefore, construction activities are not anticipated to encounter groundwater, or have prolonged contact time.

Therefore, construction would result in short-term, direct, negligible adverse impacts to groundwater.

Operation. Based on standard modern burial practices, it is unlikely that embalming fluid or other decomposition products would be released into the soil and/or groundwater during operation of the Phase 3 cemetery expansion or potential future cemetery expansions. The standard NCA design incorporates (for full casket burials) subsurface concrete crypts, an entire section of which would be installed during site construction. Using this technique, the caskets are not buried directly in the soils, rather they are set in a pre-placed concrete crypt. Modern embalming fluids are markedly less toxic as the primary active ingredients are no longer arsenic-based. Additionally, as selection of either cremain interment or columbaria placement increases, the potential for groundwater contamination commensurately decreases, as no embalming fluids are used in these processes.
Additionally, the proposed crypt fields would utilize an adequate underdrainage system designed to keep groundwater from reaching the inside of the lowest crypt. As a result, operation of crypt fields is not anticipated to encounter groundwater, or, if groundwater is present, the contact period would be temporary.

During operations, pesticide applications (as part of routine maintenance activities) would be conducted to the minimum extent necessary and in accordance with manufacturer specifications, resulting in minimal impacts to underlying groundwater resources.

Therefore, operation of the Proposed Action would have a long-term, direct, negligible adverse impact on groundwater.

### 3.7.2.2 No Action

No changes to the property would occur from implementation of the No Action alternative; therefore, no impacts to hydrology or water quality would occur. Baseline conditions would remain, as described above.

### 3.8 Wildlife and Habitat

#### 3.8.1 Existing Environment

Federally-listed species are those plants and animals protected by the federal government pursuant to the Endangered Species Act of 1973, as amended. Federally-listed species are classified as endangered or threatened. State-listed species are those plants and animals managed by the Commonwealth of Pennsylvania pursuant to Title 30, Chapter 75: Fish and Boat Code (fish, amphibians, reptiles, and aquatic organisms), Title 34, Chapter 133: Game and Wildlife Code (wild birds and mammals), and Title 17, Chapter 45: Conservation of Wild Plants (native plant species). State-listed species are classified as endangered, threatened, and species of special concern.

The potential for state- and/or federally-listed plant and animal species occurring within the Proposed Action expansion areas (Project Study Area) was assessed via the Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Tool on April 5, 2018, and during an on-site field survey for wildlife and habitat at the Project Study Area on April 13, 2018. The findings from this research and survey are summarized in the following subsections.

#### 3.8.1.1 Wildlife

Wildlife observed within the Project Study Area included red-winged blackbird (*Agelaius phoeniceus*), red-tailed hawk (*Buteo jamaicensis*), eastern wood pewee (*Contopus virens*), pileated woodpecker (*Dryocopus pileatus*), red-bellied woodpecker (*Melanerpes carolinus*), song sparrow (*Melospiza melodia*), white-tailed deer (*Odocoileus virginianus*), chickadee (*Poecile* sp.), American robin (*Turdus migratorius*), and American goldfinch (*Spinus tristis*).

#### 3.8.1.2 Listed Species

Based on the field survey and the literature review of the listed species information, it was determined that the Project Study Area contains suitable habitat for one federally- and state-listed species, listed in Table 7. Concurrence of affect determinations for the federally-listed species will be sought through the NEPA process associated with the Proposed Action.
Table 7. Listed Species Potentially Occurring within Study Area

<table>
<thead>
<tr>
<th>Scientific Name</th>
<th>Common Name</th>
<th>Federal Status</th>
<th>State Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Myotis septentrionalis</td>
<td>Northern long-eared bat</td>
<td>T</td>
<td>C – Rare</td>
</tr>
</tbody>
</table>

Notes:  
T = Threatened; E = Endangered; SSC = Species of Special Concern; C = Candidate; NL = Not Listed

**Northern Long-Eared Bat**

The northern long-eared bat is listed as a state candidate rare species by the Pennsylvania Game Commission (PGC) and as a threatened species by the U.S. Fish and Wildlife Services (USFWS). The northern long-eared bat is characterized by its long, rounded ears that, when folded forward, extend beyond the tip of the nose. In Pennsylvania, the northern long-eared bat is found in forests. Northern long-eared bats hunt at night over small ponds, in forest clearings, at tree top level, and along forest edges. They use caves and underground mines for hibernation. Maternity roosts are located in tree cavities, under exfoliating bark, and in buildings. The primary threat to the species is white-nose syndrome, a fungus that appears on the muzzle and other parts of hibernating bats. Impacts to hibernacula and loss or degradation of summer habitat can also cause mortality in northern long-eared bats.

During the field survey on April 13, 2018, the Project Study Area was surveyed for suitable northern long-eared bat habitat. No northern long-eared bats were observed during the field survey. However, suitable habitat is available for this species within two small forested areas, totaling approximately 9.9 acres of forest, in the southwest portion of the Project Study Area.

**Bald Eagle**

Although the bald eagle is no longer state or federally listed, it is still federally protected by the Bald and Golden Eagle Protection Act in accordance with 16 USC 668. Pursuant to USFWS bald eagle guidelines, any disturbance within 660 feet of a bald eagle nest requires additional coordination and potential permitting with the USFWS. The bald eagle typically uses riparian habitat associated with coastal areas, lake shorelines, and river banks. The nests are generally located near bodies of water that provide a dependable food source. According to the USFWS online bald eagle nesting sites locator, no nests are located within one mile of the Project Study Area and none were observed during the field survey on April 13, 2018. For these reasons, it has been determined that the Proposed Action would not adversely affect the bald eagle.

The Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Tool was used to assess potential impacts on state- and federally listed threatened and endangered species, as well as special concern species and resources in Pennsylvania. The PNDI environmental review for the Proposed Action, completed April 5, 2018, states that, based on PNDI records, the Pennsylvania Department of Conservation and Natural Resources, and Pennsylvania Fish and Boat Commission have not identified any known, anticipated impact on threatened and endangered species and/or special concern species and resources, and that no further review action is required.

According to the PNDI environmental project review, the PGC has identified potential impacts from the Proposed Action to state and federally listed species, which are under the jurisdiction of both the PGC and the USFWS. As a result, the PGC defers comments on potential impacts to
federally listed species to the USFWS. No further coordination with the PGC is required at this time.

The USFWS states that the proposed project is in the vicinity of a northern long-eared bat (*Myotis septentrionalis*) maternity roost(s). To avoid prohibited incidental take of northern long-eared bats during the pup season, the USFWS Avoidance Measure prohibits any tree removal from June 1 to July 31. Tree removal is defined as cutting down, harvesting, destroying, trimming, or manipulating trees, saplings, or snags. This seasonal restriction on tree removal is not required when removing hazardous trees for the protection of human life and property, as incidental take resulting from hazardous tree removal is exempted by the USFWS’s 4(d) rule. Projects that incorporate this USFWS Avoidance Measure do not require further coordination with the USFWS regarding threatened and endangered species and/or special concern species and resources under the *Endangered Species Act* (87 Stat. 884, as amended; 16 USC 1531 et seq.). The protected species information from the PNDI and USFWS is included in Appendix A.

**Critical Habitat**

The Project Study Area was assessed for the occurrence of USFWS Critical Habitat as defined by 17 CFR Part 35.1532. The Project Study Area is within the distribution area of the federally-threatened northern long-eared bat. As discussed above, northern long-eared bats live in forests. By implementing the USFWS Avoidance Measure (seasonal restrictions) on tree removal from June 1 to July 31, prohibited incidental take of northern long-eared bats during the pup season would be avoided.

**3.8.2 Environmental Consequences**

**3.8.2.1 Proposed Action**

**Construction and Operation.** The northern portion of the property designated for the Phase 3 expansion has already been disturbed and therefore construction in this area would not impact any wildlife or habitat. In addition, the Phase 3 expansion design avoids impacts to the preservation area and would maintain vegetation buffers along I-79 and County Line Road.

Construction and operation of the potential future expansion phases in the southern portion of the property would permanently convert the current pasture land to landscaped grounds. Additionally, the southern portion of the property is within the critical habitat distribution of the northern long-eared bat. Based on the PNDI environmental review, USFWS recommends the avoidance measure of seasonal tree clearing restrictions from June 1 to July 31 to avoid prohibited incidental take of northern long-eared bats during the pup season. Therefore, to avoid potential impacts to the northern long-eared bat, VA would implement the USFWS avoidance measures for tree removal described above. VA has agreed to implement these measures, as documented in Appendix A. Therefore, no further consultation or coordination under the *Endangered Species Act* would be required and northern long-eared bats would not be impacted.

The Proposed Action would focus development on previously managed or disturbed grasslands, thereby reducing the amount of herbaceous vegetation and tree disturbance. The majority of the species that are currently found at the Project Study Area are adapted to living in a disturbed and/or suburban area and co-existing with human activity. Therefore, these disturbances and alterations would have short-term, direct, less-than-significant adverse impacts on terrestrial wildlife species and on the quality of the habitat at NCOTA property.
3.8.2.2 No Action

Under the No Action Alternative, expansion would not occur. Environmental conditions would remain as they currently exist, and there would be no impact to listed species or changes in the type or quality of habitat.

3.9 Noise

3.9.1 Existing Environment

Noise sensitive receptors are defined as properties where frequent human use occurs and where a lowered noise level would be of benefit. These noise sensitive receptors are considered to be residences, hospitals, libraries, recreation areas, churches, and other similar uses.

The NCOTA is located in a quiet rural area with agricultural and low-to-medium density residential land uses predominating the immediate surrounding area. There is a church located approximately 0.2 miles directly east of NCOTA and across I-79 in a medium-density residential neighborhood. Several houses are located in a low-density pattern adjacent to the northwestern boundary of NCOTA property, along County Line Road. There are no schools or hospitals within a 1-mile radius of NCOTA.

The noises in the immediate surrounding area are typical of rural/residential areas. The principal source of noise in the area is from traffic along I-79, and to a lesser degree along nearby roads including Morgan Road and County Line Road.

The noises at NCOTA are generated during weekday daytime hours and include ceremonial rifle salutes during memorial services at committal shelters, routine maintenance activities (mowing, burials, etc.), and visitor traffic within the cemetery grounds.

No other notable noise-generating sources are present at or in the immediate vicinity of NCOTA.

3.9.2 Environmental Consequences

If a project would result in significantly adverse increases in ambient noise levels at sensitive receptors or result in excessive ground-borne vibration to persons or property, it could have a significant effect.

3.9.2.1 Proposed Action

Construction. Noise would be generated during construction of the Phase 3 expansion and potential future expansion phases. A similar type and volume of noise would be generated during these expansions. Noise would be produced by construction equipment primarily involved in land grading, road construction, and excavations. Once mobilized to the site, the majority of construction equipment would remain within the proposed expansion area/construction boundary until that phase of construction for which the equipment was needed is complete. This approach would minimize the need for multiple mobilizations of equipment, thereby decreasing the amount of noise associated with equipment travel within NCOTA and on nearby roads.

Within the proposed expansion area, noise from construction activities would vary depending on the type of equipment being used at the time. The impact from this noise on a receptor depends on the distance between the noise source and receptor. Generally, noise levels decrease by approximately 6 dBA for every doubling of distance for point sources (such as a single piece of construction equipment), and approximately 3 dBA for every doubling of distance for line sources (such as a stream of motor vehicles on a busy road at a distance). The nearest noise receptor would
be the low-density residential area bordering the northwestern portion of the property. The current preservation area in the northern portion of the property is located between the Phase 1 cemetery and this receptor. This preservation area acts as a buffer to further attenuate the intensity of noise experienced by these receptors.

Noise impacts would be further minimized by equipping construction equipment with appropriate sound-muffling devices (i.e., from the original equipment manufacturer or better), and limiting engine idling to less than 5 minutes. Additionally, construction activities would take place during daylight hours and during weekdays, unless there is a specific activity that would directly impact the current operation of the cemetery, in which case the activity would be scheduled outside of the normal construction schedule.

To minimize construction noise impacts on cemetery memorial services, notably loud construction activities would be scheduled to occur when these services are not being conducted, to the extent possible.

Construction workers would be working in close proximity to construction equipment and could be exposed to noise levels above 90 dBA. This is above the permissible noise exposure level defined by the Occupational Safety and Health Administration (OSHA). These levels would be reduced to permissible levels through feasible administrative or engineering controls, and/or the use of BMPs such as the use of hearing protection equipment to ensure compliance with applicable OSHA standards.

Therefore, construction of the Proposed Action would result in short-term, direct, less-than-significant adverse impacts to receptors of noise that include visitors to the cemetery, off-site receptors, and workers.

Operation. The Proposed Action does not include any new committal shelters; therefore, no new locations for ceremonial rifle salutes would be created. Ceremonial rifle salutes would continue to occur at the Phase 1 cemetery committal shelters, which to date have not resulted in any documented noise concerns. Operation of the Proposed Action would expand noise generated from maintenance activities and visitor traffic occurring within the expansion areas within the northern and southern portions of the property. The noise generated from these activities would be similar to current Phase 1 cemetery operations. These noises have not generated any documented concerns from nearby receptors. To ensure operational maintenance noises do not become a nuisance, the maintenance equipment would be maintained in good working order. Additionally, maintenance equipment would be operated during daylight working hours and away from committal services, thereby maintaining the dignity and solemnity of NCOTA environment during these memorial services.

As such, operation of the Proposed Action would result in short-term, direct, negligible adverse noise impacts on sensitive receptors.

3.9.2.2 No Action

Under the No Action Alternative, the cemetery expansion would not occur, and no additional noise impacts would result. Ceremonial rifle salutes would continue until cemetery capacity is reached, and grounds maintenance activities would continue thereafter.
3.10 Floodplains and Wetlands

3.10.1 Existing Environment

Wetlands

The USACE has regulatory jurisdiction over Waters of the United States, including wetlands pursuant to Section 404 of the Clean Water Act (CWA) and Navigable Waters of the United States pursuant to Section 10 of the 1899 Rivers and Harbors Act. Jurisdictional wetlands are delineated based upon the presence of hydric soils, hydrologic indicators, and hydrophytic vegetation in accordance with the Regional Supplement to the Corps of Engineers Wetlands Delineation Manual for the Eastern Mountains and Piedmont Region (USACE, 2012) and Classification of Wetlands and Deepwater Habitats of the United States (Cowardin et al., 1979). In Pennsylvania, wetlands and streams are potentially regulated under Title 25, Pennsylvania Code, Section 105, Dam Safety and Water Management as Regulated Waters of this Commonwealth (Commonwealth of PA, 2018c).

In 2002, Civil & Environmental Consultants, Inc. (CEC) completed a Wetland and Stream Delineation for the property in accordance with the USACE Wetland Delineation Manual, Technical Report Y-87-1 and using wetland criteria detailed in the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region (Version 2.0) (Environmental Laboratory, 1987; USACE, 2012). CEC identified 17 separate wetland areas ranging in size from 0.1 to 0.98 acres and totaling 2.44 acres, and 1,230 linear feet of streams. A USACE Regulatory Guidance Letter for Jurisdictional Determination, dated June 26, 2008, determined that these wetlands may be jurisdictional waters of the United States and could, therefore, be subject to USACE oversight under Section 404 of the CWA.

In 2017 ESC Mid-Atlantic, LLC (ESC) completed a Wetland and Stream Delineation for the southern portion of the property in accordance with the aforementioned USACE requirements (Environmental Laboratory, 1987; USACE, 2012). As depicted in Figure 9, ESC identified seven palustrine emergent (PEM) wetlands and one palustrine forested (PFO) wetland ranging in size from 0.01 to 0.44 acre and totaling 1.22 acres, and one perennial stream totaling 1,520 linear feet (this unnamed stream is described under the Surface Water heading in Section 3.7). All wetlands identified on NCOTA property are associated with the perennial stream. The primary hydrological sources for the wetland areas are seeps originating upslope or within the wetland areas, concentration of surface flows in low lying areas, and the unnamed perennial stream.

A USACE Regulatory Guidance Letter for Jurisdictional Determination, dated October 16, 2017, determined that these wetlands may be jurisdictional waters of the United States and could, therefore, be subject to USACE oversight under Section 404 of the CWA. A copy of the letter is provided in Appendix A.

In addition to the above on-site delineations, one USFWS NWI-mapped wetland was identified within a mixed forest in the northern portion of the property, but outside of the Phase 3 expansion area boundary. This wetland was classified as R5UBH: Riverine, Unknown Perennial, Unconsolidated Bottom, Permanently Flooded (USFWS, 2018). This NWI-mapped wetland is also mapped as PA Chapter 93 stream with a designated use of Warm Water Fishes (WWF). There is no existing use listed for this stream.
Figure 9. Wetlands and Waters of the United States in Southern Area
Floodplains

Based on review of available Federal Emergency Management Agency (FEMA) Flood Zone Maps (Figure 10), NCOTA property is located within an area of minimal flood hazard (Zone X; above the 500-year floodplain), and is not within a 100-year (Zone A, AE) or a 500-year floodplain (FEMA, 2015). The PADEP, in absence of a FEMA-mapped floodplain, regulates the floodway, which is assumed to be 50 feet from top-of-bank on either side of the stream.

3.10.2 Environmental Consequences

3.10.2.1 Proposed Action

Wetlands

Construction. As part of the 2015 SEA, which analyzed the potential development for a design very similar to the proposed Phase 3 expansion, the USACE issued a letter dated April 11, 2014, indicating that the proposed expansion would not impact streams or wetlands, and therefore a Department of the Army permit was not required (VA, 2015). However, the letter indicated that if the plans changed, VA should consult with USACE to determine whether a permit would be required based on the new plan.

Under the current Proposed Action analyzed in this SEA, the Phase 3 expansion boundary in the norther portion of the property is generally similar to the proposed expansion area analyzed in the 2015 SEA (see Figure 2A). Likewise, the 2018 Master Plan design for the Phase 3 expansion also entirely avoids development within or near wetlands or waters of the U.S. (including the NWI-mapped wetland near the eastern border and the unnamed stream near the northern border). Therefore, the Phase 3 expansion would have no adverse impact on wetlands or waters of the U.S.

Under the Proposed Action for the potential future expansion phases in the southern portion of the property, the 2018 Master Plan includes the potential construction of an up to 1.5-acre irrigation pond that, if implemented, would encompass the approximately 0.19-acre jurisdictional wetland (Wetland H) near the central eastern border of the property (see Figure 2B). This action would require a Pennsylvania Chapter 105 Water Obstruction and Encroachment Permit and USACE Section 404 Permit, referred to as the “Joint Permit Application,” and is required for projects that affect surface waters, wetlands, or sovereign submerged lands. However, the decision to create the potential irrigation pond would not be made for at least another 8-10 years, at the time when VA would conduct an overall evaluation of the need to implement another expansion phase per the 2018 Master Plan. Accordingly, the Joint Permit Application would only be submitted if and when a future decision is made to construct the potential irrigation pond. A functions and values assessment of the wetland would be conducted to establish the value associated with the impact and compensatory mitigation would be required to offset the value lost as a mitigation measure. Additionally, under the Proposed Action, the 2018 Master Plan design for potential future expansion in the southern portion of the property includes the construction of a ring road with two bridges that would cross above the unnamed stream. To avoid impacts to the stream and adjacent wetlands, the bridge footings would be located 50 feet beyond the top of bank of the stream and the wetland boundaries. This approach would ensure the construction of the bridges would avoid having an adverse impact on wetlands or waters of the United States.
Figure 10. Natural Resource Map for the Proposed Action Project Study Area
Construction activities that result in removal of vegetation and expose soils could increase sediment loads in stormwater run-off, which could cause an adverse impact if allowed to reach wetlands and surrounding streams. To avoid this potential adverse impact, the construction contractor would implement the erosion and sediment control BMPs previously described under the Soils and Hydrology and Water Quality headings in Sections 3.6 and 3.7, respectively.

By implementing these design avoidance measures and BMPs, construction of the Phase 3 expansion would have no impact on wetlands, while the potential future expansion phases would have a long-term, direct, minor adverse impact.

**Operation.** Operation of the Proposed Action has no anticipated activities that would adversely impact wetlands. Existing and new stormwater engineering controls would be properly maintained to ensure stormwater run-off is properly managed such that its flow would not cause soil erosion. Additionally, newly landscaped vegetated areas would be professionally maintained to ensure soils remain covered and are not subject to potential erosive forces. Herbicide/pesticide applications would be made accordingly to label instructions as part of routine maintenance activities and would avoid direct application to or near wetlands or surface water bodies.

Therefore, operation of the Proposed Action would result in long-term, direct, negligible adverse impacts on wetlands and waters of the U.S.

**Floodplains**

The Proposed Action would have no impact on floodplains. As previously described, NCOTA property is not located within 100- or 500-year floodplains and bridge footings would be located 50 feet beyond the top of bank of the stream and the wetland boundaries.

**3.10.2.2 No Action**

The No Action Alternative would result in no impacts to wetlands because expansions would not occur, and current conditions would remain unchanged. Similar to the Proposed Action, the No Action alternative would have no impact on floodplains.

**3.11 Socioeconomics**

**3.11.1 Existing Environment**

The NCOTA is located within a rural, low-density residential area in southwestern Pennsylvania. The socioeconomic conditions are influenced by the employment opportunities in the region, which are predominantly associated with agriculture and mining (mineral, fuels) to the west, and light and heavy manufacturing, health care, and retail activities to the east/northeast toward Pittsburgh. The median annual income in Washington County, PA is $57,534, which is slightly more than the median annual income of $54,895 for Pennsylvania and $55,332 for the United States. Washington County is the 18th most populated county in Pennsylvania, and the population has remained generally steady at approximately +200,000 individuals from 1970 to 2016 (the year the most recent data were reported).

Relevant demographic data for Washington County and Pennsylvania are presented in Table 8, and economic data are presented in Table 9. The data presented herein are from the U.S. Census Bureau's 2012-2016 American Community Survey (ACS) 5-year Summary and the U.S. Department of Labor, Bureau of Labor Statistics (BLS).
Table 8. Demographic Data for Washington County and Commonwealth of Pennsylvania

<table>
<thead>
<tr>
<th>Location</th>
<th>Total Population¹</th>
<th>Median Age</th>
<th>% Population under age 18¹</th>
<th>% Minority Population²</th>
<th>% High School Graduates¹</th>
<th>Veterans¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington County</td>
<td>207,298</td>
<td>44.3</td>
<td>19.5%</td>
<td>6.3%</td>
<td>91.8%</td>
<td>16,379</td>
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<tr>
<td>Commonwealth of Pennsylvania</td>
<td>12,805,537</td>
<td>40.6</td>
<td>20.8%</td>
<td>17.9%</td>
<td>89.5%</td>
<td>840,258</td>
</tr>
</tbody>
</table>

¹ – U.S. Census Bureau 2018a
² – includes all race/ethnicity categories except non-Hispanic White persons

Table 9. Economic Data for Washington County and the Commonwealth of Pennsylvania

<table>
<thead>
<tr>
<th>Location</th>
<th>Number of Households¹</th>
<th>% Population in Poverty²</th>
<th>% Unemployment Rate²</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington County</td>
<td>83,745</td>
<td>9.7%</td>
<td>6.2%</td>
</tr>
<tr>
<td>Commonwealth of Pennsylvania</td>
<td>4,961,929</td>
<td>12.9%</td>
<td>9.3%</td>
</tr>
</tbody>
</table>

¹ – U.S. Census Bureau, 2018b
² – NOTE: Estimates are not comparable to other geographic levels due to methodology differences that may exist between different data sources.

3.11.2 Environmental Consequences

3.11.2.1 Proposed Action

Construction. VA would utilize a competitive bidding process to select and hire a qualified firm to construct the Phase 3 expansion. A similar process would be used to construct each of the potential future expansion phases in the southern portion of the property. Construction of the individual expansion phases would not result in a direct or indirect significant beneficial or adverse impact on socioeconomics on a regional scale. However, construction of an expansion phase would require the temporary employment (by the construction contractor) of skilled laborers during each phase. Additionally, construction would require the purchase of supplies and materials (aggregate, masonry, landscape plantings) from local and regional vendors. The temporary increase in employment and spending on materials would have a short-term, direct, less-than-significant beneficial impact on the local economy, but only a negligible or no impact on the regional socioeconomic conditions. These construction-related beneficial impacts would end once a construction phase is completed.

Operation. The current workforce at NCOTA is anticipated to be sufficient to maintain and operate the Proposed Action expansion phases. If needed, additional maintenance staff (1-5) could be hired to help maintain the larger area of landscaped grounds. Maintaining or slightly increasing staff levels would have no measurable impact on the socioeconomic conditions of the county or region.

The Proposed Action would increase the interment capacity, and therefore the longevity of NCOTA. Over time, this would lead to a slight increase in the number of visitors to this area of southwestern Pennsylvania. These visitors could potentially utilize area businesses (restaurants, lodging, service stations, etc.) during visits. The potential increase in spending would have a negligible beneficial impact in context to the overall economic activity in Washington County or the southwestern region of Pennsylvania. Additionally, extending the longevity of NCOTA allows
veterans in southwestern Pennsylvania to continue choosing to be interred at this National Cemetery, and allows their families, who may also reside in southwestern Pennsylvania, to avoid traveling longer distances to other National Cemeteries beyond this region of Pennsylvania.

Therefore, operation of the Proposed Action would have a long-term, direct and indirect, negligible beneficial impact on socioeconomics.

3.11.2.2 No Action

Under the No Action alternative, the Proposed Action would not be implemented, and the longevity of NCOTA would not be extended. The benefits associated with the Proposed Action would not be realized. Therefore, the No Action alternative would have a short- and long-term, negligible adverse impact on socioeconomics.

3.12 Community Services

3.12.1 Existing Environment

The NCOTA has provided burial benefits for Veterans and their families in southwestern Pennsylvania since 2005. Although the Phase 1 cemetery has a capacity of approximately 13,000 gravesites, VA anticipates this capacity will be reached in the next several years (the specific date is not calculated because burial frequency can change over time). As previously described in Section 1, there are no other National Cemeteries within 75-miles of NCOTA.

There is no public transportation available within a mile of the cemetery. Washington County’s public transportation system, Freedom Transit, provides a “Shared Ride” transportation program to eligible residents within Washington County.

Other community services provided by Washington County include police and fire protection, ambulatory service, schools, health care, and parks and recreation. Because no additional load is expected to be placed on these or other community services as a result of the Proposed Action, impacts to community services other than Veterans’ burial benefits are not analyzed in this SEA.

3.12.2 Environmental Consequences

3.12.2.1 Proposed Action

Construction and Operation. The Proposed Action Phase 3 expansion would provide approximately 13,000 gravesites, and approximately 50,900 gravesites over the course of full buildout of the potential future expansion phases in the southern portion of the property. Therefore, the Proposed Action would extend the longevity of NCOTA for several decades. This would allow VA to meet the continued demand for burial benefits by Veterans and their families in southwestern Pennsylvania, resulting in a direct, long-term, significant beneficial impact on this community resource.

3.12.2.2 No Action

Under the No Action alternative, the Proposed Action would not be implemented, and there would be no increase in burial capacity or extension of the longevity of NCOTA. Upon reaching capacity, Veterans in southwestern Pennsylvania would be required to obtain burial benefits at another National Cemetery, the nearest of which is located more than 75-miles outside of southwestern Pennsylvania. NCA has learned through experience that few people will elect burial at a National Cemetery that is farther than 100 miles from their residence, and that there is a reluctance for burial to take place across a state line from the place of residence (VA, 2001). Veterans, their families,
and visitors would have to travel approximately 225 miles—a distance considered to be an undue burden—to obtain burial benefits at the next nearest National Cemetery in Pennsylvania. Furthermore, the No Action alternative is not in compliance with the Service Members Civil Relief Act. Therefore, the No Action alternative would result in a long-term, direct, significant adverse impact on burial opportunities for Veterans and their families in southwestern Pennsylvania.

3.13 Solid and Hazardous Materials

3.13.1 Existing Environment

Historical Waste Assessment

As part of the 2001 EA, a hazardous materials assessment including an environmental database review and site reconnaissance was performed to identify "recognized environmental conditions" that may have existed on the property prior to VA’s purchase of it. This assessment met the government records search requirement of American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessment, E 1527-00.

Based on the site reconnaissance, regulatory review, and historical photograph review, the following recognized environmental concerns were identified in the 2001 SEA:

- One or possibly two Underground Storage Tanks (UST) abandoned in approximately 1970 remained in the ground adjacent to one of the [now former] barns on the southern farm [southern portion of the property]. The UST contained gasoline but was "emptied." No tank closure methods were implemented.

- A heating oil UST adjacent to the [now former] Robert Morgan, Sr. house near the center of the northern portion of the property.

The 2001 EA recommend further investigation of these USTs, though no further information about these USTs was present in the available file material. The former Robert Morgan, Sr. house was demolished during the development of the Phase 1 cemetery in 2006-2007; due to extensive site regrading, the heating oil UST would also have been removed. To date, there have been no documented encounters with petroleum-impacted soils in the Phase 1 cemetery. Therefore, no further investigation of the northern area is warranted.

Based on aerial photographs, the barn, house, and other outbuildings that were present on the southern portion of the property were removed between 2004 and 2007 after VA purchased the parcel in 2003. Although the available file information does not describe the removal of these structures, it is possible that the UST(s) were encountered and removed coincident with demolition of the buildings. During the 2017 geotechnical investigation of the southern portion of the property, no evidence of USTs or petroleum-impacted soils was noted on the boring logs. However, should a UST be encountered during potential future expansion phases, the process for its removal or abandonment in place, as well as management of any potentially contaminated soil, would follow the requirements specified in the PADEP Division of Storage Tanks Closure Requirements for Underground Storage Tanks (Technical Guidance 253-4500-601; effective July 8, 2017).
**Current Conditions**

As part of current NCOTA operations, solid waste is generated on a routine basis and includes typical office debris, flowers and other items left behind at burial sites, and container waste associated with minor vehicle maintenance activities. Solid waste is collected weekly and transferred to an off-site landfill for disposal by an outside vendor.

Minimal quantities of hazardous materials are present at the NCOTA maintenance complex. These materials include diesel fuel in a 750-gallon aboveground storage tank (AST) and gasoline in a 250-gallon AST, lead/acid batteries for carts and machinery, oil/grease for maintenance machinery, paints, and temporary storage of up to 10 gallons of waste oil that is transported and disposed of off-site by an outside vendor. The maintenance complex also houses an oil/water separator to collect wash water from NCOTA maintenance vehicles; the oil/water separator is cleaned annually by an outside vendor. Other minimal quantities of hazardous materials include may be brought on-site by contractors on an as-needed basis for activities such as pest control and weed management. Small volumes of excess soils are generated during burial operations. These soils are reutilized on-site whenever possible. Excess soils are stockpiled at the NCOTA spoils area located to the east of I-79.

**3.13.2 Environmental Consequences**

**3.13.2.1 Proposed Action**

**Construction.** Prior to construction of potential future expansion phases in the southern portion of the property, further investigation would be performed for the possible UST(s) in the area of the former buildings. Should a UST be discovered, 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).

Construction of the Phase 3 expansion and potential future expansion phases would generate solid waste, consisting of cleared vegetation, excess soil, and excess construction materials and packaging. Cleared vegetation would be composted on- or off-site. Excess soils would be reused on-site as fill to raise the elevation of designed burial areas. Any coal encountered would be managed as previously described under the Soils heading in Section 3.6. Excess construction materials would be containerized in a designated area within the construction site, and then transported off-site for recycling; materials that cannot be recycled would be landfilled off-site. Accordingly, the nature of the solid wastes generated during construction of the Proposed Action would be similar to a typical construction project (e.g. packaging, scrap hardscape supplies, etc.), and the volumes generated would not be anticipated to make a major contribution to the overall solid waste volume generated and disposed of in Washington County or southwestern Pennsylvania.

Additionally, all construction contractors would comply with VA’s solid and hazardous materials SOPs and management measures described in NCA Master Construction Specifications. These management measures would ensure that potential impacts from construction of the expansion areas would remain at short-term, direct, negligible adverse levels.

**Operation.** Operation of the Proposed Action would result in a negligible increase in the volume of solid wastes currently generated at NCOTA. These additional solid wastes would consist of flowers and other items left behind at burial sites. This potential future waste stream would be
combined with the existing sanitary solid waste stream. Operation of the Proposed Action would not require or result in an increase in the volume of office wastes or maintenance vehicle wastes. Solid waste would continue to be collected weekly in designated dumpsters and transferred by a qualified private contractor to an appropriate municipal solid waste landfill.

Hazardous materials used during operation of the Proposed Action would be limited to approved pesticides and/or herbicides, applied according to the manufacturers’ labeled instructions. These materials would be used for insect control and weed management in burial areas with landscaped vegetation and/or built structures (e.g. columbaria).

Anticipated future solid waste generation would be a negligible contributor to overall solid waste volumes generated in the area. Therefore, operation of the Proposed Action would have a long-term, direct, negligible adverse impact on solid wastes and hazardous materials.

3.13.2.2 No Action

Under the No Action alternative, the Proposed Action would not be implemented. An investigation of the potential UST(s) in the southern portion of the property would not occur. As noted in the 2001 EA, the UST was reportedly empty and abandoned in place, and therefore the possible continued presence of the potential UST is not anticipated to result in long-term adverse impacts on the environment. However, it remains possible that future development of this portion of the property would address the need for UST removal and remediation measures, if warranted. No other changes to solid and hazardous materials volume or management would occur under the No Action alternative. Therefore, no impacts would occur, and baseline conditions would remain, as described above.

3.14 Transportation and Parking

3.14.1 Existing Environment

Transportation Infrastructure in the Vicinity of NCOTA

The NCOTA is located on the north and south sides of Morgan Road east of County Line Road in Washington County, Pennsylvania (Figure 11). The property is divided by I-79 into a western section (260 acres; location of NCOTA Phase 1 cemetery) and an eastern section (32 acres; location of a spoils area). The NCOTA is approximately 13 miles from the Pittsburgh International Airport.

The NCOTA main entrance and exit are located along Morgan Road, a two-lane road maintained by the Washington County Department of Public Works. A separate maintenance entrance and exit is located on Morgan Road, approximately 1,000-feet northwest of NCOTA main entrance (Figure 12).

There is no interchange at I-79 with Morgan Road and therefore no direct access to NCOTA from I-79. The closest interchange on I-79 is the Southpointe Boulevard Interchange located approximately 0.5-miles south of NCOTA entrance. Therefore, the principal approaches to NCOTA from all major directions include:

- **From the north**: South on I-79 to Southpointe/Hendersonville interchange, east (left) towards Hendersonville, north (left) on Morganza Road, then west (left) onto Morgan Road to the main entrance.
From the south: North on I-79 to Southpointe/Hendersonville interchange, east (right) towards Hendersonville, north (left) on Morganza Road, then west (left) onto Morgan Road to the main entrance.

From the east: Baker Road changes to Morgan Road at Morganza Road. West (straight) on Morgan Road to the main entrance.

From the west: East on Cecil-Henderson Road to Morgan Road, east (left) on Morgan Road to the main entrance.

Major highways that serve these local roadways include I-79, State Route (SR) 50, and US 19.

Transportation Infrastructure within NCOTA

Within the northern portion of NCOTA property, a series of asphalt-paved roadways allow visitors and staff to access burial areas, maintenance buildings, and administrative offices in the northern portion of the property. Use of this roadway is restricted to cemetery visitors and staff. No recreational uses are permitted. Visitors can drive directly to burial areas and park on the roadside. Visitors can also use the temporary parking area at the information kiosk. A cortege area near the main entrance provides a designated parking area for visitors attending a memorial service. Additionally, designated cortege staging areas for visitors attending a memorial service are provided near the memorial flag pole and each of the committal shelters. Parking for administrative staff is located at the administrative building. A separate contractor/maintenance parking area is located at the contractor yard as well as at the maintenance building, which is accessible via the maintenance entrance along Morgan Road. This ensures construction vehicles and associated equipment are not readily visible to visitors and maintains the solemnity of the National Cemetery. No other parking areas are present within the vicinity of NCOTA.

The southern portion of the property is accessible from a small gravel-covered road originating along Morgan Road, between NCOTA main entrance and the maintenance entrance. This road crosses over the unnamed stream channel and leads to the satellite maintenance shed. The private cemetery is also accessible from a narrow unpaved road originating along Morgan Road, directly across from the main NCOTA exit. The spoils area to the east of I-79 is accessible by crossing the Morgan Road bridge over I-79 and then turning north onto the dirt entrance road.
Figure 11. Roadways Associated with NCOTA
Figure 12. Existing Entrances and Exits to NCOTA

Source: 2018 Master Plan
Traffic Volumes for Area Roadways

Operation of NCOTA contributes approximately 260 vehicles to the daily traffic volume along Morgan Road. This traffic is generated from an average of 40 funeral services performed per week/8 funeral services performed per day, with each funeral cortege containing approximately 3-50 vehicles for an average of 20 vehicles. The NCOTA receives approximately 100 visitors per day and up to 1,000 visitors on holidays, as well as a small number of vehicles from employees and contractors.

In December 2017, the Pennsylvania Turnpike Commission (PTC) released traffic data along with the Morganza/Morgan Road improvements for construction of the Southern Beltway SR 0576, Section 55C2-2 in Washington County, Pennsylvania. Traffic data for the study area are presented in Table 10.

Table 10. Average Annual Daily Traffic Volume for Area Roadways

<table>
<thead>
<tr>
<th>Location</th>
<th>Current Year ADT (2017)</th>
<th>Design Year ADT (2040)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SR 1009 (Morganza Road)</td>
<td>6,400</td>
<td>16,100</td>
</tr>
<tr>
<td>T-781 &amp; SR 1034 (Morgan Road)</td>
<td>2,150</td>
<td>4,300</td>
</tr>
<tr>
<td>T-787 (Baker Road)</td>
<td>3,100</td>
<td>12,500</td>
</tr>
</tbody>
</table>

Source: PTC, 2017

The 2001 SEA for site selection concluded that the impact of construction and operating NCOTA at the property on day-to-day transportation would be minimal (VA, 2001). To date, operation of NCOTA has not resulted in documented adverse impacts to area traffic levels or the transportation network.

Southern Beltway Project

Project Elements

In September 2008, a Record of Decision (ROD) (granting environmental clearance) was issued for the Southern Beltway Project, a major construction project initiated by the PTC (Federal Highway Administration [FHWA], 2008). The Southern Beltway Project would be a four-lane divided, limited access, tolled expressway originating at U.S. Route 22 at the completed Findlay Connector interchange that continues south and east to a connection with I-79 in Cecil Township, Washington County, near the Allegheny County/Washington County line and immediately adjacent to NCOTA. A full interchange is planned at I-79 and Morganza Road (SR 1009), immediately to the east of NCOTA (see Figure 13 and Figure 14). This interchange would greatly improve access to NCOTA from I-79. Additionally, as part of the Southern Beltway Project, Morgan Road would be improved by slightly modifying its grade (flattening) and alignment to improve visibility and safety.
Figure 13. Southern Beltway Construction Project Location Map

Source: Southern Beltway Commission, 2016

Figure 14. Project 55C2-2 Location

Source: Southern Beltway Commission, 2016
Southern Beltway Project EIS and MOUs

The PCT completed an engineering and environmental impact study (EIS) to define and evaluate the alternatives for the Southern Beltway Project. Five alternatives were considered in total, with the evaluation of these alternatives presented to the public in 1997. Three alternatives were advanced for further evaluation to include engineering and environmental impact analysis, public involvement, and resource agency involvement.

Public comments on the EIS included concerns with visual effects at NCOTA located along both sides of I-79 and the need for local roadway traffic access to the proposed interchange. In response, the PTC subsequently reevaluated and refined the original three-level design of the I-79 interchange to a two-level interchange; thereby reducing the potential visual effects (FHWA, 2008).

The Final EIS (FEIS) included measures to minimize harm to NCOTA during construction of the Southern Beltway Project, including:

- FHWA coordination with VA to address impacts to NCOTA and to develop design and mitigation strategies to further avoid and minimize impacts. A Memorandum of Understanding (MOU) was executed on March 28, 2006 to facilitate the coordinated and compatible development of both NCOTA and the Southern Beltway Projects.
- At the I-79 interchange area, the PTC would include earthen mounds along the western ramp to minimize its visual intrusion on NCOTA. In addition, special plantings would be utilized to further screen the Southern Beltway Project from NCOTA in this area.

In 2016 an updated MOU was negotiated between VA and PTC (see Appendix B). Updates to the 2006 MOU included the following elements:

- The PTC will complete a reevaluation of the FEIS for the Southern Beltway Project, and submit the reevaluation to the FHWA for approval. The PTC will allow VA to review and comment on the reevaluation of the FEIS as it is developed, to ensure that it meets VA’s requirements and essential functions.
- As part of its FEIS reevaluation, the PTC will conduct, in cooperation with the PA SHPO, a review of all land owned by VA which is required for construction of the Southern Beltway Project, including all permanent and temporary easements.
- The PTC and VA agree that no dirt work, construction, infrastructure installation nor any other actions or decisions that may be deemed an irretrievable commitment of resources may take place on VA’s property prior to the approval of the FEIS reevaluation by FHWA and prior to VA’s completion of its own evaluation related to the proposed granting of easements from VA to PTC.
- The PTC agrees to the reconstruction of Morgan Road and Morgan Road Bridge as part of the Section 55-C2-2 Project, in accordance with the design approved by VA. Access to NCOTA, which is a critical mission of VA, will be improved.
- The PTC agrees to construct a 350-foot long architectural wall behind the flagpole located on NCOTA property.

Accordingly, these updates reflect continued coordination between VA and PTC as the Southern Beltway Project and the Proposed Action (expansion of NCOTA) progress.
Southern Beltway Project Traffic Volumes

The PTC currently estimates the following traffic volumes once the improvements to Morgan Road are completed in 2020 (the estimated “Opening Year”) and in 2040 (“Design Year”) (based on pers. communication with MSConsultants [PCT engineering contractor] on March 28, 2018):

- Opening Year (2020) Average Daily Traffic Volume: 3,300 vehicles per day (2,150 in 2017)
- Opening Year (2020) Peak Hour Volumes:
  - AM Peak Hour = 230 vehicles per hour
  - PM Peak Hour = 196 vehicles per hour
- Design Year (2040) Average Daily Traffic Volume: 4,300 vehicles per day
- Design Year (2040) Peak Hour Volumes:
  - AM Peak Hour = 520 vehicles per hour
  - PM Peak Hour = 331 vehicles per hour

Southern Beltway Project Schedule

The PTC is scheduled to begin work on the Southern Beltway Project beginning in August - September 2018 with a completion date in June 2020. The construction would be completed in two phases. The first phase would replace the bridge over I-79 and complete work on Morgan Road to the east of I-79. The second phase would complete work on Morgan Road to the west of I-79. Both phases would affect traffic patterns in and around NCOTA.

3.14.2 Environmental Consequences

This section analyzes the potential impacts of the Proposed Action on existing transportation infrastructure, with consideration of the upcoming Southern Beltway Project improvements.

3.14.2.1 Proposed Action

As previously discussed in the description of the Proposed Action in Section 2.2, the Phase 3 expansion transportation infrastructure improvements consist of the following elements (described in detail in Section 2.2):

- Grade Separated Connector Drive (bridge over Morgan Road)
- Semi-Circular Roadway (extending from western end of the bridge outlet, then back to Morgan Road)
- Roadway System Improvements (northern and southern portions of the property)

Construction. During construction of the expansion phases, there would be a temporary increase in the number of vehicles (including both construction vehicles and worker vehicles) on area roadways including Morgan Road and Morganza Road, and within NCOTA roadways. The existing area roadway infrastructure is adequate for handling this temporary increase in roadway use, and no modifications to these roadways or traffic patterns would be required. Based on the Southern Beltway Project schedule, during the next two years, construction traffic may be required to access NCOTA from County Lane Road from the north, or Route 1010 from the south. Using these alternative roads would have a negligible increase on construction traffic travel times, and
therefore would not increase construction costs or scheduling. Additionally, these alternative roads are adequate for handling the temporary construction traffic. Construction vehicles traveling to and from NCOTA would ultimately access NCOTA from Morgan Road. If warranted, flaggers may be utilized to notify oncoming traffic of slower construction vehicles entering or exiting onto Morgan Road. These temporary traffic increases would cease once each expansion phase is completed.

Construction vehicles associated with the Phase 3 expansion would travel on the existing roadways in the northern portion of the property; these roadways are adequate to handle the temporary construction traffic and would not require physical alternation or traffic pattern modifications. Prior to traveling through NCOTA, the construction contractor would coordinate with NCOTA Caretaker or Administrator to ensure construction vehicle traffic through the cemetery does not disrupt the solemnity of committal services and processions. Additionally, if required, flaggers would be utilized to notify oncoming traffic of slower construction vehicles entering or exiting Morgan Road from the construction areas.

Construction vehicles associated with potential future expansion phases in the southern portion of the property would initially travel over unimproved ground, until such time that a roadway network is established. Similar to the Phase 3 expansion management measures, construction vehicles associated with future expansion phases would be scheduled and coordinated to avoid causing traffic to visitors or area roadways.

To ensure that construction vehicles do not degrade the quality of the existing or planned future roadways within NCOTA, gravel pads would be established at the exit of each construction area to ensure dirt is removed from construction vehicle tires before traveling on the cemetery roadways.

Therefore, construction activities associated with the Proposed Action would have a short-term, direct, negligible adverse impact on transportation and parking within or in the vicinity of NCOTA.

**Operation.** Operation of the Phase 3 expansion and potential future expansion areas would generate a minor increase in visitor traffic. By the time the new burial areas are available to accept interments, the Southern Beltway Project improvements would be complete or nearly so (by 2020); including the new interchange leading directly to NCOTA and improvements to Morgan Road. This would enable visitors to travel on I-79 to reach NCOTA without having to use smaller arterial roadways. Therefore, the increase in visitor traffic would have no or a negligible impact on these smaller, local area roadways.

The existing parking areas near the Honor Guard at Committal Shelters one and two would be expanded to accommodate eight-to-ten cars at each location, alleviating parking congestion in those areas. Elsewhere within NCOTA, visitors would continue to be allowed to park along the roadways near the burial sections. Therefore, operation of the Proposed Action would have a long-term, direct, negligible beneficial impact on transportation and parking.

**3.14.2.2 No Action**

No changes to transportation or parking at NCOTA would occur under the No Action alternative; therefore, no impacts would occur. Baseline conditions would remain, as described above. However, the Southern Beltway Project would still proceed and independently provide benefits to visitors traveling to NCOTA.
3.15 Utilities

As part of the 2001 EA for site selection and development of NCOTA, VA analyzed utility systems and concluded that all utility systems had adequate capacity to support operations (VA, 2001). Subsequent development of NCOTA required utilization of utilities (electric, sanitary waste, potable water), and this utilization has not caused any reported impacts on utility service levels to others in the surrounding community. Operation of the Proposed Action would require increased utilization of the water utility. Therefore, this section focuses on the analysis of this utility only.

3.15.1 Existing Environment

The NCOTA purchases potable tap water from Pennsylvania American Water to irrigate approximately 22-acres of landscaped areas of the Phase 1 cemetery. As part the prior proposed expansion for the northern portion of the property analyzed in the 2015 SEA, VA conducted an investigation to identify potential alternative irrigation water sources to meet federally mandated conservation goals (VA, Basis of Design Report Update, July 14, 2015; Irrigation Water Source and Existing Conditions Study, Aqua Engineering, December 11, 2013).

Potential non-potable water sources considered included surface water, recycled water, storm water retention and ground water or a combination of some sources. The investigation concluded that there were no streams or lakes on the property that could provide surface water. Research showed that there were no recycled water sources in the county. Groundwater wells were investigated and were found to not have the capacity or quality to provide water for irrigation. The only potential source was stormwater harvesting. However, it was determined that a pond in the northern portion of the cemetery would only be able to provide enough water to irrigate approximately 5-7 acres of landscaped area. Based on this analysis, VA ultimately decided to continue using the potable water utility to supply irrigation water for the future expansion in the northern portion of the cemetery.

3.15.2 Environmental Consequences

3.15.2.1 Proposed Action

Construction. Construction of the Proposed Action would not require the consumption of the potable water utility. However, during construction, the existing irrigation system would be extended to the Phase 3 expansion area. This extension would not be anticipated to require potable water service interruptions within NCOTA or in the surrounding community. A similar extension would be made during the construction of potential future expansion phases in the southern portion of the property.

Therefore, construction of the Proposed Action would not be anticipated to cause any adverse impacts on the water utility.

Operation. Operation of the Phase 3 expansion would require approximately 3 million gallons of water annually to irrigate approximately 7 acres of newly landscaped areas. The potable water would continue to be supplied by Pennsylvania American Water.

For the potential future expansion phases, VA would utilize non-potable water sources for irrigation water to the maximum extent feasible; this could involve constructing a stormwater retention pond (up to 1.5 acres in area) for use as an irrigation water supply source. The remaining irrigation water needed would be supplied by the potable water utility. However, prior to utilizing the utility, VA would contact Pennsylvania American Water to confirm that the utility has adequate
capacity to provide the required water volume without causing service interruptions elsewhere at
NCOTA or to other utility customers. The actual volume of irrigation water to be supplied by the
utility has not been calculated for the purposes of the analysis in this SEA; the volume would be
dependent on future conditions including availability of non-potable sources and the actual area to
be irrigated.

Additional measures to reduce the operational irrigation water requirement include planting and
maintaining native, non-invasive drought-tolerate turfgrass and other vegetation.

Therefore, operation of the Phase 3 expansion would not have a significant adverse impact on the
potable water utility. Prior to operation of potential future expansion phases in the southern portion
of the property, VA would coordinate with the utility provider to ensure that utilization of the water
would not have a significant adverse impact on the quality of service provided to other utility
customers.

3.15.2.2 No Action

Under the No Action alternative, no changes to the irrigation system would be required, and no
changes to the water utility use levels would occur. Baseline conditions would remain, as described
above.

3.16 Environmental Justice

3.16.1 Existing Environment

Executive Order 12898 “Federal Actions to Address Environmental Justice in Minority
Populations and Low-Income Populations” was enacted in 1994 to focus federal agencies attention
on the environmental and human health conditions in minority communities and low-income
communities with the goal of achieving environmental justice. Under this Executive Order,
Federal agencies must identify and address the human health or environmental effects of its actions
on minority and low-income populations.

For this analysis, data for minority and low-income population were obtained for the area within
a 2.5-mile radius of NCOTA, all of Washington County, and the Commonwealth of Pennsylvania
(Table 11). According to these data, the area within a 2.5-mile radius of NCOTA has a generally
similar minority population as Washington County, but lower than Pennsylvania, and a higher
percentage of low-income populations (household income less than $25,000/year) than either the
surrounding county or state.
Table 11. Minority and Low-Income Populations

<table>
<thead>
<tr>
<th>Location</th>
<th>Total Population</th>
<th>% Minority Population</th>
<th>Percentage of Population below Poverty Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.5-mile radius of NCOTA</td>
<td>5,023</td>
<td>4.7%</td>
<td>10.2%</td>
</tr>
<tr>
<td>Washington County</td>
<td>207,298</td>
<td>6.3%</td>
<td>9.7%</td>
</tr>
<tr>
<td>Commonwealth of Pennsylvania</td>
<td>12,784,227</td>
<td>17.9%</td>
<td>12.9%</td>
</tr>
</tbody>
</table>

Notes:
2 – includes all race/ethnicity categories except non-Hispanic White persons

3.16.2 Environmental Consequences

3.16.2.1 Proposed Action

The Proposed Action is not anticipated to have a disproportionate impact on low-income or minority groups in Washington County. The Proposed Action would cause no changes in population, income levels, housing, local tax revenues, or other non-cemetery community services. However, the Proposed Action may provide a temporary increase in local employment if the contractor(s) selected to perform construction activities hire local crew members, which could result in a minor positive socioeconomic impact on the community. Additionally, the Proposed Action would extend the longevity of NCOTA, thereby avoiding the need for minority or low-income Veterans, their families, and visitors to travel to another National Cemetery outside of southwestern Pennsylvania.

3.16.2.2 No Action

No changes at the site would occur from implementation of the No Action alternative; therefore, minor adverse Environmental Justice impacts to minority and low-income populations would occur, as these populations would have to travel to another National Cemetery outside of southwestern Pennsylvania once NCOTA reaches full capacity. Baseline conditions would remain, as described above.
4.0 CUMULATIVE IMPACTS

The CEQ regulations for implementing NEPA define cumulative effects as “the impact on the environment which results from the incremental impact of the proposed action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time” (40 CFR Part 1508.7). This SEA considers past, present, and reasonably foreseeable short-term and long-term future effects from implementing the Proposed Action and other projects that coincide with the location and timetable of the Proposed Action. Reasonably foreseeable projects are projects for which plans have been approved, projects for which funding has been identified, recently completed projects, and projects in progress.

4.1 Proposed Action

As determined through the analysis provided in Section 3, the Proposed Action would not result in any appreciable (i.e., more than negligible) adverse impacts in context with existing baseline conditions for Air Quality, Geology, Solid and Hazardous Materials, Transportation and Parking, Utilities, and Environmental Justice. Therefore, these resources were not evaluated for potential cumulative impacts. Additionally, resources that would be beneficially impacted by the Proposed Action were not evaluated for potential cumulative impacts, including Aesthetics (operation), Socioeconomics (construction and operation), Community Services (operation), and Transportation and Parking (operation). 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 (construction), Cultural Resources, Topography, Soils, Surface Water (construction), Wildlife and Habitat (construction), Noise (construction), and Wetlands. Therefore, past, present and reasonably foreseeable future projects that could result in effects on these resource areas were considered for analysis.

4.2 Projects Considered for Potential Cumulative Impacts

Beyond the Proposed Action, some other actions within the region could result in cumulative impacts. Within the same timeframe as the next phase of construction and operation of the cemetery, other actions that may have cumulative impacts on the environment include:

- Past and future phases of construction for NCOTA, to include a maximum of 69,579 interment sites, as well as associated support facilities and roadways (VA, 2018);
- Installation of fiber optic cable, wireless communication network, and other technology upgrades along the length of I-79;
- Reconstruction and upgrade to the intersection of State Route 19 and Valley Brook Road; and
- The Southern Beltway Project elements in the vicinity of NCOTA, including a 13-mile extension of the Southern Beltway to connect Route 22 and I-79 near Southpointe Town Center; the new interchange at I-79 and Morgan Road; and the safety improvements to Morgan Road.
4.3 Effects of Cumulative Actions on the Proposed Action

No significant, cumulative adverse impacts to any of the resources analyzed in this SEA would be expected from the implementation of the Proposed Action. The following is analysis of cumulative impacts on Aesthetics (construction), Cultural Resources, Topography, Soils, Surface Water and Wetlands (construction), Wildlife and Habitat (construction), and Noise (construction).

Aesthetics (construction). Short-term, direct, less-than-significant adverse, cumulative impacts on aesthetics are expected from the construction of the Proposed Action in combination with present and other reasonably foreseeable future actions. The short time-frame (18-24 months) for construction on expansion phases, and the prolonged time period (8-10 years) between phases, would generally avoid overlap with other projects that may also have temporary aesthetic impacts associated with the presence of on-going construction work. The construction of the Phase 3 expansion and the Southern Beltway Project improvements would have the greatest potential for overlap. However, the potential cumulative adverse impacts from these temporary projects would not increase to a significant adverse level. Furthermore, the result of these projects would have long-term beneficial impacts on the aesthetic conditions of the area. The Proposed Action would expand the park-like setting of the National Cemetery to more areas across NCOTA property, while the Southern Beltway Project would allow for direct access to NCOTA from I-79. This would decrease vehicle travel on smaller arterial roadways throughout residential neighborhoods. This reduction in traffic would improve the aesthetic condition in those neighborhoods. Therefore, the Proposed Action would result in less-than-significant cumulative adverse impacts on aesthetics.

Cultural Resources. The Proposed Action would have potential long-term, direct, less-than-significant adverse impacts on cultural resources, primarily due to the potential to encounter and disturb previously unknown archaeological resources during ground-disturbing construction activities. Cumulatively, the Proposed Action could result in minor adverse impacts if a large number of objects is disturbed within the expansion areas, as well as in the area to the east of I-79 where construction of the interchange of I-79 and Morgan Road will take place as part of the Southern Beltway Project. However, based on prior archaeological investigations at NCOTA property and information from the 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. The Proposed Action would have a long-term, direct, less-than-significant impact on the topography due to grading of the expansion areas. The topography within the northern portion of NCOTA property has undergone extensive grading as a result of prior cemetery development. Although additional grading is expected in the southern portion of NCOTA property, the generally undulating contour of the land would be retained. Other reasonably foreseeable projects in the area would not require as extensive grading. Therefore, considered cumulatively, the Proposed Action would result in less-than-significant adverse impacts 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 runoff. Soils at NCOTA have undergone modifications as a result of extensive agricultural activities and development 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 effects on soils, but implementation of BMPs in the SESC plan and NPDES General Permit would be expected to minimize potentially adverse cumulative impacts to 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.** Short- and long-term, less-than-significant cumulative adverse impacts on surface water and wetlands are expected from implementation of the Phase 3 expansion and reasonably foreseeable future expansion phases. For these projects, short-term impacts on water resources, such as erosion and sedimentation and contamination from accidental spills, would be avoided and minimized by adhering to 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 prior to construction.

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 adverse cumulative impacts on water resources.

**Wildlife and Habitat (construction).** Short- and long-term, less-than-significant impacts to wildlife and habitat would occur from implementation of the Proposed Action. Other projects in the vicinity of NCOTA would not be anticipated to have a significant adverse impact on wildlife and habitat, as these projects would occur in areas that have been disturbed or developed and are not known to contain high value habitat. Additionally, wildlife residing in and around NCOTA and the cumulative action areas are assumed to be adapted to human activities, including vehicle traffic and noise levels associated with urban areas. Therefore, considered cumulatively, the Proposed Action would result in short- and long-term, less-than-significant adverse impacts.

**Noise.** Short- and long-term, less-than-significant impacts to sensitive noise receptors would 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.
4.4 Effects of Cumulative Actions on the No Action Alternative

Under the No Action alternative, the conditions at NCOTA would remain as they currently exist for the foreseeable future. The current burial capacity would not be increased beyond the Phase 1 cemetery, effectively decreasing the longevity of NCOTA to only a few more years (in context of the availability to accept new burials). This would result in a long-term, significant adverse impact on Community Services (e.g. lack of burial opportunities at a National Cemetery within southwestern Pennsylvania). However, considered cumulatively, this impact and others associated with the No Action alternative are not anticipated to generate additional adverse impacts, or increase the level of adverse impacts, on other resources analyzed in this SEA.

4.5 Potential for Generating Substantial Controversy

The Proposed Action is not likely to cause controversy. The Proposed Action would extend the longevity of NCOTA for the next several decades. This would be positively perceived by Veterans and the public. As discussed in previous sections, no elements of the Proposed Action are anticipated to generate substantial controversy or lead to negative public reaction.

Under the No Action alternative, substantial public controversy would be anticipated due to the lack of burial opportunities at NCOTA and the decrease in its anticipated longevity.
5.0 AGENCY COORDINATION AND PUBLIC INVOLVEMENT

VA invites public participation in decision-making on new proposals through the NEPA process. Public participation with respect to decision-making on the Proposed Action is guided by 38 CFR Part 26, VA’s policy for implementing the NEPA. Additional guidance is provided in VA’s Environmental Compliance Management Directive (VA, 2012) and VA’s NEPA Interim Guidance for Projects (VA, 2010). Consideration of the views and information of all interested persons promotes open communication and enables better decision-making. Agencies, organizations, and members of the public with a potential interest in the Proposed Action, such as minority, low-income, and disadvantaged persons, have been urged to participate. The following sections describe agency coordination and public involvement efforts completed by VA in association with the Draft SEA and the Final SEA and FONSI.

5.1 Draft SEA

5.1.1 Federal, State, and Local Agency Coordination

On December 10, 2018, VA mailed letters to notify the federal, state, and local agencies (listed in Section 8) of the release of the Draft SEA and the opportunity to review the document and provide comments within 30-day period (a copy of the letter is provided in Appendix B). Comments were provided by only one agency. The PADCNR issued a letter dated January 4, 2019, stating they determined that no impact is likely to occur as a result of the Phase 3 expansion in the northern portion of NCOTA property or from the 10 potential future expansion phases in the southern portion of the property (a copy of the letter is provided in Appendix B).

5.1.2 Native American Tribal Coordination

For federal proposed actions, federal agencies are required to consult with federally-recognized Native American tribes in accordance with NEPA, NHPA, NAGPRA, EO 13007 and EO 13175. Based on a review of the U.S. Department of the Interior Bureau of Indian Affairs, there are no federally-recognized Native American Tribes in Pennsylvania. However, during the prior EAs (VA, 2001; VA, 2015), VA identified and contacted several state and local Native American tribes having possible ancestral ties to the Proposed Action's Region of Interest (i.e., Washington County, Pennsylvania) and invited each tribe to consult on those prior actions. During the preparation of the 2015 SEA, the Delaware Tribe of Indians concurred that the previously identified Tombstone Site should be avoided. Furthermore, they concurred that the “project site” (the entire NCOTA property) had been extensively disturbed and that the potential for disturbing additional cultural resources was low, and they therefore had no objections to the project as it was proposed in 2015 (VA, 2015). The 2018 Master Plan takes into account the Tombstone Site and includes a 75-foot setback from the private cemetery boundary to avoid disturbance to potential previously undocumented gravesites associated with this family cemetery. As such, VA has concluded that further consultation regarding the Proposed Action is not warranted.

5.1.3 Public Involvement

VA made the Draft SEA available for public review and comment. 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. A copy of the Draft SEA NOA and affidavits of publication are provided in Appendix C. (It is noted that the Draft SEA indicated the NOA would be published in the Bridgeville Area News and the Pittsburgh Tribune-Review. However, the Bridgeville Area News is no longer published and greater coverage was available through the Pittsburg Post-Gazette.) As
stated in the NOA, the Draft SEA was available for review in print at 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 the VA’s website at http://www.cem.va.gov/cem/EA.asp. The NOA instructed the public to submit comments or request additional information from: Mr. Glenn Elliott, U.S. Department of Veterans Affairs, Office of Construction & Facilities Management, 425 I (eye) Street, NW, Room 6W417a, Washington, D.C., 20001; by email to glenn.elliott@va.gov; or by telephone at (202) 632-5879.

No comments on the Draft SEA were received from the public.

5.2 Final SEA and FONSI

A NOA announcing the release of the Final SEA and FONSI has been published in the *Pittsburg Post-Gazette*. As stated in the NOA, the Final SEA and FONSI have been made available for review in print at NCOTA Public Information Center; at the Frank Sarris Public Library, 35 North Jefferson Avenue, Canonsburg, PA; at 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. Additional information about the Final SEA and FONSI may be requested in writing to Mr. Fernando Fernandez, U.S. Department of Veterans Affairs, Construction & Facilities Management Office, 425 I (eye) Street, NW, Room 6W417b, Washington, D.C., 20001; by email at fernando.fernandez@va.gov; or by telephone at (202) 632-5529.

An administrative record of these documents is maintained at VA OCFM in Washington, D.C.
6.0 ENVIRONMENTAL PROTECTION MEASURES AND MONITORING

This chapter summarizes the avoidance, minimization, and management measures (identified in Chapter 3) that have been incorporated into the Proposed Action to ensure that any adverse impacts remain at or below minor, less-than-significant adverse levels. “Management measures” are defined as routine BMPs and/or regulatory environmental compliance and protection measures that are regularly implemented as part of proposed activities, as appropriate, across Pennsylvania. Per established protocols, procedures, and requirements, VA (and VA’s design and construction contractors) would implement these management measures and satisfy all applicable regulatory requirements associated with the design, construction, and operation of the Proposed Action. These management measures are summarized in Table 12. Additionally, environmental permits and approvals potentially required for construction and operation of the Proposed Action are provided in Table 13.

Table 12. Environmental Protection Measures and Monitoring Incorporated into the Proposed Action

<table>
<thead>
<tr>
<th>AESTHETICS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Construction</strong></td>
</tr>
<tr>
<td>▪ Construct the expansion phases according to the design and sequence presented in the 2018 Master Plan.</td>
</tr>
<tr>
<td>▪ 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.</td>
</tr>
<tr>
<td>▪ As needed, install construction privacy fencing between the expansion area and the existing cemetery burial sections to reduce visual impacts to visitors.</td>
</tr>
<tr>
<td>▪ Plant native, non-invasive, drought-resistant vegetation following grading.</td>
</tr>
<tr>
<td><strong>Operation</strong></td>
</tr>
<tr>
<td>▪ Professionally maintain the landscaped areas consistent with existing cemetery operations.</td>
</tr>
<tr>
<td>▪ Conduct maintenance activities (mowing, power-washing, etc.) on a schedule that limits potential disruptions to committal services.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>AIR QUALITY</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Construction</strong></td>
</tr>
<tr>
<td>▪ Implement the dust control BMPs described for aesthetics.</td>
</tr>
<tr>
<td>▪ Utilize appropriate construction scheduling (avoid earthwork during extremely windy and dry periods).</td>
</tr>
<tr>
<td>▪ Stabilize exposed soil with vegetation or mulching to minimize erosion and potential dust generation.</td>
</tr>
<tr>
<td>▪ 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.</td>
</tr>
</tbody>
</table>
- 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.

- Visually monitor construction activities on a daily basis, and particularly during extended periods of dry weather; implement additional dust control measures as needed.

**Operation**

- Keep landscaping and maintenance equipment (mowers, power washers used to clean monuments, etc.) in good working order.

**CULTURAL RESOURCES**

**Construction**

- Implement the “Inadvertent Discovery” plan as follows; should human remains or other cultural items as defined by the *Native American Graves Protection and Repatriation Act* (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 .Tribes are contacted to properly identify and appropriately treat discovered items in accordance with applicable federal and state regulations.

- Establish a 75-foot setback around the boundary of the Tombstone Site (36WH153) to exclude it from all potential future ground disturbing activities.

**Operation**

- Implement the “Inadvertent Discovery” plan described above for construction.

**GEOLOGY, SOILS, AND TOPOGRAPHY**

**Construction**

- Follow NCA Guidelines on slopes and grades. Generally, grade individual burial sections to less than 6%, and pitch roads no greater than 10%.

- 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.

- Prepare and implement a stormwater management plan consistent with Chapter 102 of PA State Code approved by WCCD. Implement the specified BMPs.

- Quickly revegetate disturbed areas following completion of construction activities to minimize the length of time that soils are exposed.

- Minimize the disturbance to or creation of steep slopes (do not exceed 15% slopes).

- 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.

- Re-use excess soils on-site to the maximum extent practicable.

- Extract coal if encountered and manage according to PADEP Surface Mining Conservation and Reclamation Act (25 PA Code Section 86.6).
### Operation

- 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.

- Revegetate exposed soils to prevent erosion and manage excess soils by stockpiling in the designated spoils area.

### HYDROLOGY AND WATER QUALITY

#### Construction and Operation

- Implement the soil erosion and stormwater management system BMPs listed above for Geology, Soils, and Topography.


- 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.

- Maintain native, non-invasive, drought-resistant vegetation to prevent exposure of underlying soils.

- 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.
- Manage coal according to the requirements specified for Soil.
- 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).

**Operation**
- Manage new solid waste volumes with existing and similar waste streams for collection and off-site disposal.
- Manage herbicide and pesticide use as described under Soils.
### TRANSPORTATION AND PARKING

**Construction**

- If required, utilize flaggers to notify oncoming traffic of slower construction vehicles entering or exiting Morgan Road from the construction entrance.

- Schedule and route construction vehicle traffic away from roadways within the existing cemetery to avoid interfering with committal service processions.

- Utilize BMPs specified for Soil to avoid tracking dirt onto area roadways.

### UTILITIES

**Construction and Operation**

- 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.

- 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.

- Reduce operational irrigation water demand by planting and maintaining native, non-invasive drought-tolerant turfgrass and other vegetation.
<table>
<thead>
<tr>
<th>Permit, Approval, or Certification</th>
<th>Responsible Agency</th>
<th>Applicable Criteria</th>
<th>Required Actions</th>
<th>Permitting Schedule</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Federal or State Environmental</strong></td>
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</tr>
<tr>
<td>Chapter 105 Water Obstruction and Encroachment</td>
<td>Pennsylvania Department of Environmental Protection (PADEP)</td>
<td>Federal or State Environmental</td>
<td>Conduct a Pre-Application Meeting with water pollution biologist or other environmental specialist to ensure that the proposed design meets Chapter 105 requirements. The USACE reviewer also attends the pre-application meeting. Submit a Joint Chapter 105/Section 404 Application to the PADEP (and the PADEP submits to the USACE).</td>
<td>1 month to prepare application. Agency review takes approximately 3 months.</td>
<td>The PADEP will respond with an administrative completeness letter which has a 60-day response turn around, then they submit a technical comment letter which also has a 60-day turn-around period.</td>
</tr>
<tr>
<td>PADEP Chapter 102 PAG-02 NPDES General Permit for Stormwater Discharges Associated with Construction Activities</td>
<td>Pennsylvania Department of Environmental Protection (PADEP)</td>
<td>PADEP Chapter 102 PAG-02 NPDES General Permit for Stormwater Discharges Associated with Construction Activities</td>
<td>Complete permit application including thermal Impact Analysis and Anti-degradation Analysis and submit to the PADEP. Erosion and sediment control plans are required to be submitted with the Chapter 105 Water Obstruction and Encroachment permit.</td>
<td>One month to prepare, 45 days to achieve permit coverage.</td>
<td>The NOI gets submitted to PADEP Southwest Regional Office in Pittsburgh.</td>
</tr>
<tr>
<td>Pennsylvania Natural Heritage Program (PNHP) Threatened and Endangered Species Consultation</td>
<td>Pennsylvania Game Commission (PGC), Pennsylvania Department of Conservation and Natural Resource (DCNR), Pennsylvania Fish and Boat Commission (PFBC), and US Fish and Wildlife Service (USFWS).</td>
<td>Pennsylvania Natural Heritage Program (PNHP) Threatened and Endangered Species Consultation</td>
<td>Upload project shapefile to PHNP’s online mapper to determine impacts to threatened and endangered species.</td>
<td>Online review takes approximately 15 minutes to a half hour; if further consultation is required, agency response time can be up to two months.</td>
<td>April 5, 2018, PNDI environmental review, the PGC response to the Proposed Action is that it could have potential impacts to state- and federally-listed species which are under the jurisdiction of both the PGC and the USFWS. The PGC defers comments on potential impacts to federally listed species to USFWS. According to the PNDI environmental review, USFWS response to the Proposed Action is that it the proposed project is within the vicinity of known northern long-eared bats maternity roost trees. To avoid prohibited incidental take of northern long-eared bats during the pup season, no tree removal from June 1 to July 31. VA agreed to implement USFWS avoidance measures. No further coordination required. Signed Final Project Environmental Review Receipt mailed to USFWS PA field office on February 11, 2019. PADEP permit not required.</td>
</tr>
</tbody>
</table>

**Assumptions**

Local permits will not be obtained.
# 7.0 LIST OF PREPARERS

**U.S. Department of Veterans Affairs Office of Construction and Facilities Management**  
Mr. Glenn Elliott, Senior PP/M  
Environmental Officer

Mr. Fernando L. Fernández, REM  
Environmental Engineer

**Contractor Staff**  
Mabbett & Associates, Inc. Team

<table>
<thead>
<tr>
<th>Name</th>
<th>Role</th>
<th>Years of Experience</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Glucksman, MS, LEED AP</td>
<td>Project Manager, Subject-Matter Expert, Document Preparation and Review</td>
<td>13</td>
</tr>
<tr>
<td>H. Bisbee, MS</td>
<td>Senior Document Review, Document Preparation</td>
<td>13</td>
</tr>
<tr>
<td>P. Steinberg, PE, LSP</td>
<td>Program Manager, Document Review</td>
<td>25</td>
</tr>
<tr>
<td>K. Samuels, PWS</td>
<td>Subject-Matter Expert, Document Preparation and Review</td>
<td>23</td>
</tr>
<tr>
<td>N. Shearer</td>
<td>Subject-Matter Expert, Document Preparation</td>
<td>13</td>
</tr>
<tr>
<td>M. Martinkovic, MA, RPA</td>
<td>Subject-Matter Expert, Document Preparation</td>
<td>15</td>
</tr>
</tbody>
</table>
8.0 AGENCIES AND INDIVIDUALS CONSULTED

**Federal Agencies**

United States Army Corps of Engineers, Pittsburgh District  
1000 Liberty Avenue  
Pittsburgh, PA 15222-4186

Natural Resources Conservation Service  
Tom Sierzega, Jr.  
PO Box 329  
Meadowlands, PA 15347

United States Department of the Interior  
Fish and Wildlife Services  
1849 C Street NW  
Washington, DC 20240

Fish and Wildlife Service  
Pennsylvania Field Office  
Lora Zimmerman  
Project Leader/Supervisor  
315 South Allen Street, Suite 322  
State College, PA 16801-4850

USEPA - Region 3  
Ms. Karen DelGrosso  
1650 Arch Street  
Philadelphia, PA 19103-2029

**State Agencies**

Pennsylvania Department of Agriculture  
George Greig, Secretary  
2301 North Cameron Street  
Harrisburg, PA 17110

Region 4  
Jim Kennedy, Regional Director  
6 McIntyre Road  
Gibsonia, PA 15044-9644

Bureau of Farmland Preservation  
Doug Wolfgang, Bureau Director  
2301 N. Cameron St., Room 402  
Harrisburg, PA 17110-9408

Pennsylvania Department of Environmental Protection  
E. Christopher Abruzzo, Secretary  
Rachel Carson State Office Building  
400 Market Street  
Harrisburg, PA 17101

Southwest Regional Office  
Sue Malone, Director  
400 Waterfront Drive  
Pittsburgh, PA 15222-4745

Pennsylvania Department of Military and Veterans Affairs  
Chuck Pollacci, Director  
Bldg. S-0-47, FTIG  
Annville, PA 17003

Pennsylvania Historical and Museum Commission  
James M. Vaughn, Executive Director  
300 North Street  
Harrisburg, PA 17120

Pennsylvania Bureau for Historic Preservation  
Andrea MacDonald, Bureau Director/Deputy SHPO  
Commonwealth Keystone Building  
Second Floor 400 North Street  
Harrisburg, PA 17120-0093

Pennsylvania Department of Conservation and Natural Resources *  
Ellen Ferretti, Secretary  
Rachel Carson State Office Building  
7th Floor  
Harrisburg, PA 17105-8767

Pennsylvania Natural Heritage Program  
Rachel Carson State Office Building, 6th Floor  
PO Box 8552  
Harrisburg, PA 17105-8767
Bureau of Forestry
Pennsylvania Natural Diversity
Inventory*
Jeanne Harris
PO Box 8552
Harrisburg, PA 17105-8552

Pennsylvania Bureau of Forestry
Daniel A. Devlin, State Forester
Rachel Carson State Office Building
6th Floor
PO Box 8552
Harrisburg, PA 17105-8552

Pennsylvania Department of
Transportation
Angela Jaillet-Wentling
CRP Archaeologist, Districts 11-0 and 12-0
825 N. Gallatin Avenue
Uniontown PA 15401

County Agencies

Washington County, Pennsylvania

Historical Society
Jim Ross
49 East Maiden Street
Washington, PA 15301
Chad Roule, Executive Director Agricultural
Land Preservation Program

County Planning & Development
Department
Lisa L. Cessna, Executive Director
Courthouse Square
100 W. Beau St., Suite 701
Washington, PA 15301

Local Agencies

Cecil Township
Donald A. Gennuso, Township Manager
George Augustine, Chairman, Zoning,
Building, Planning & Zoning Department
Bill Bottorff, Director, Public Works
Shawn F. Bukovinsky, Police Department
Chief
Janet DeFelice, Tax Collector
3655 Millers Run Rd.
Cecil, PA 15321

Utilities

Electric- FirstEnergy Corp.
76 South Main Street
Akron, OH 44308

Gas- People’s Natural Gas
PO Box 535323
Pittsburgh, PA 15253-5323

Water- Pennsylvania-American Water
Company
800 W. Hershey Park Drive
Hershey, PA 17033
9.0 REFERENCES


10.0 GLOSSARY

Sources:


Aesthetic resources: The components of the environment as perceived through the visual sense only. Aesthetic specifically refers to beauty in both form and appearance.

Affected environment: A portion of the NEPA document that succinctly describes the environment of the area(s) to be affected or created by the alternatives under consideration. Includes the environmental and regulatory setting of the proposed action.

Alternative: A reasonable way to fix the identified problem or satisfy the stated need.

Attainment area: An area that the Environmental Protection Agency has designated as being in compliance with one or more of the National Ambient Air Quality Standards (NAAQS) for sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone, lead, and particulate matter. An area may be in attainment for some pollutants but not for others.

Conformity analysis: The Clean Air Act requires the Environmental Protection Agency to promulgate rules to ensure that federal actions conform to the appropriate state implementation plans (SIP) for air quality. Two sets of rules (one for transportation and one for all other actions) developed by USEPA establish the criteria and procedures governing the determination of this conformity. A conformity analysis follows these criteria and procedures to quantitatively assess whether a proposed federal action conforms with the SIP.

Council on Environmental Quality (CEQ): Established by Congress within the Executive Office of the President as part of the National Environmental Policy Act of 1969, CEQ coordinates federal environmental efforts and works closely with agencies and other White House offices in the development of environmental policies and initiatives. The Council's Chair, who is appointed by the President with the advice and consent of the Senate, serves as the principal environmental policy adviser to the President. The CEQ reports annually to the President on the state of the environment, oversees federal agency implementation of the environmental impact assessment process, and acts as a referee when agencies disagree over the adequacy of such assessments.

Criteria pollutant: An air pollutant that is regulated by National Ambient Air Quality Standards (NAAQS). Criteria pollutants include sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone, lead, and two size classes of particulate matter, PM10 and PM2.5. New pollutants may be added to, or removed from, the list of criteria pollutants as more information becomes available.

Cumulative effect (cumulative impact): The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.
Decibel (dB): A unit for expressing the relative intensity of sounds on a logarithmic scale from zero for the average least perceptible sound to about 130 for the average level at which sound causes pain to humans. For traffic and industrial noise measurements, the A-weighted decibel (dBA), a frequency-weighted noise unit, is widely used. The A-weighted decibel scale corresponds approximately to the frequency response of the human ear and thus correlates well with the loudness perceived by people.

Effects: Effects and impacts, as used in NEPA, are synonymous. Effects include ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions that may have both beneficial and detrimental effects, even if on balance the agency believes that the effect would be beneficial. There are direct effects and indirect effects. Direct effects are caused by the action and occur at the same time and place. Indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

Endangered species: Plants or animals that are in danger of extinction through all or a significant portion of their ranges and that have been listed as endangered by the U.S. Fish and Wildlife Service or the National Marine Fisheries Service following the procedures outlined in the Endangered Species Act and its implementing regulations.

Environmental assessment (EA): A concise public document for which a federal agency is responsible that serves to briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement (EIS) or a finding of no significant impact; aid an agency's compliance with NEPA when no environmental impact statement is necessary; or facilitate preparation of an EIS when one is necessary. Includes brief discussions of the need for the proposal, of alternatives, of the environmental impacts of the proposed action and alternatives, and a listing of agencies and persons consulted.

Environmental impact statement (EIS): A detailed written statement required by Section 102(2)(C) of NEPA, analyzing the environmental impacts of a proposed action, adverse effects of the project that cannot be avoided, alternative courses of action, short-term uses of the environment versus the maintenance and enhancement of long-term productivity, and any irreversible and irretrievable commitment of resources.

Environmental justice: The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic groups, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies. Executive Order 12898 directs federal agencies to make achieving environmental justice part of their missions by identifying and addressing disproportionately high and adverse effects of agency programs, policies, and activities on minority and low-income populations.

Finding of no significant impact (FONSI): A public document issued by a federal agency briefly presenting the reasons why an action for which the agency has prepared an environmental
assessment has no potential to have a significant effect on the human environment and, thus, would not require preparation of an environmental impact statement.

**Floodplain**: The lowland and relatively flat areas adjoining inland and coastal waters including flood-prone areas of offshore islands, including at a minimum, that area subject to a one percent or greater chance of flooding in any given year.

**Fugitive emissions**: Emissions that do not pass through a stack, vent, chimney, or similar opening where they could be captured by a control device. Any air pollutant emitted to the atmosphere other than from a stack. Sources of fugitive emissions include pumps; valves; flanges; seals; area sources such as ponds, lagoons, landfills, and piles of stored material (such as coal); and road construction areas or other areas where earthwork is occurring.

**Hazardous material**: Any material that poses a threat to human health and/or the environment. Hazardous materials are typically toxic, corrosive, ignitable, explosive, or chemically reactive.

**Historic property**: Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.

**Impacts**: see Effects.

**Impervious surface**: A hard surface area that either prevents or retards the entry of water into the soil or causes water to run off the surface in greater quantities or at an increased rate of flow. Common impervious surfaces include, but are not limited to, rooftops, walkways, patios, driveways, parking lots, storage areas, concrete or asphalt paving, and gravel roads.

**National Ambient Air Quality Standards (NAAQS)**: Standards defining the highest allowable levels of certain pollutants in the ambient air (i.e., the outdoor air to which the public has access). Primary standards are established to protect public health; secondary standards are established to protect public welfare (for example, visibility, crops, animals, buildings).

**National Pollutant Discharge Elimination System (NPDES)**: A provision of the Clean Water Act that prohibits discharge of pollutants into waters of the United States unless a special permit is issued by the Environmental Protection Agency, a state, or, where delegated, a tribal government on an Indian reservation.

**National Register of Historic Places**: The nation’s inventory of known historic properties that have been formally listed by the National Park Service (NPS). The National Register of Historic Places is administered by the NPS on the behalf of the Secretary of the Interior. National Register listings include districts, landscapes, sites, buildings, structures, and objects that meet the set of criteria found in 36 CFR 60.4.

**No action alternative**: The alternative where current conditions and trends are projected into the future without another proposed action.

**Particulate matter (PM), PM10, PM2.5**: Any finely divided solid or liquid material, other than uncombined (that is, pure) water. A subscript denotes the upper limit of the diameter of particles included. Thus, PM10 includes only those particles equal to or less than 10 micrometers (0.0004
inch) in diameter; PM2.5 includes only those particles equal to or less than 2.5 micrometers (0.0001 inch) in diameter.

**Proposed action:** In a NEPA document, this is the primary action being considered. Its impacts are analyzed together with the impacts from alternative ways to achieve the same objective and the required no action alternative, which means continuing with the status quo.

**Runoff:** The portion of rainfall, melted snow, or irrigation water that flows across ground surface and is eventually returned to streams. Runoff can pick up pollutants from the air or the land and carry them to streams, lakes, and oceans.

**Scope:** Consists of the range of actions, alternatives, and impacts to be considered in an environmental analysis. The scope of an individual statement may depend on its relationships to other statements (also see tiering).

**Scoping:** An early and open process for determining the extent and variety of issues to be addressed and for identifying the significant issues related to a proposed action (40 CFR §1501.7). The scoping process helps not only to identify significant environmental issues deserving of study, but also to deemphasize insignificant issues, narrowing the scope of the NEPA process accordingly, and for early identification of what are and what are not the real issues (40 CFR §1500.5(d)). The scoping process identifies relevant issues related to a proposed action through the involvement of all potentially interested or affected parties (affected federal, state, and local agencies; recognized Indian tribes; interest groups, and other interested persons) in the environmental analysis and documentation.

**Significantly:** As used in NEPA, requires considerations of both context and intensity.

- **Context**—significance of an action must be analyzed in its current and proposed short- and long-term effects on the whole of a given resource (for example, affected region).
- **Intensity**—refers to the severity of the effect.

**Solid waste:** Non-liquid, non-soluble materials ranging from municipal garbage to industrial wastes that contain complex and sometimes hazardous substances. Solid wastes also include sewage sludge, agricultural refuse, demolition wastes, and mining residues. Technically, solid waste also refers to liquids and gases in containers.

**Wetlands:** Those areas that are inundated by surface water or groundwater with a frequency sufficient to support, and under normal circumstances do, or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas.

Jurisdictional wetlands are those wetlands protected by the *Clean Water Act*. They must have a minimum of one positive wetland indicator from each parameter (vegetation, soil, and hydrology). The U.S. Army Corps of Engineers requires a permit to fill or dredge jurisdictional wetlands.
APPENDICES

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Appendix B – Regulatory Communications
Appendix C – Public Involvement
Appendix A – Environmental Survey Reports
Resource Avoidance Report for the
Proposed Expansion of the National Cemetery of the Alleghenies
Cecil Township, Washington County, Pennsylvania

Prepared for:
US Department of Veterans Affairs
Office of Construction and Facilities Management (003C4B)
425 I Street, NW
Washington, DC 20001

Prepared by:
Mabbett & Associates, Inc.
5 Alfred Circle
Bedford, MA 01730

AECOM
150 North Orange Avenue, Suite 200
Orlando, FL 32801

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April 30, 2018
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<tr>
<td>APE</td>
<td>Area of Potential Effect</td>
</tr>
<tr>
<td>BHP</td>
<td>Bureau of Historic Preservation</td>
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<tr>
<td>CEC</td>
<td>Civil &amp; Environmental Consultants, Inc.</td>
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<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
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<tr>
<td>CWA</td>
<td>Clean Water Act</td>
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<tr>
<td>DCNR</td>
<td>Department of Conservation and Natural Resources</td>
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<tr>
<td>EO</td>
<td>Executive Order</td>
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<tr>
<td>ESC</td>
<td>ESC Mid-Atlantic, LLC</td>
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<tr>
<td>FEMA</td>
<td>Federal Emergency Management Agency</td>
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<tr>
<td>FONSI</td>
<td>Finding of No Significant Impact</td>
</tr>
<tr>
<td>GPR</td>
<td>Ground Penetrating Radar</td>
</tr>
<tr>
<td>GSA</td>
<td>General Services Administration</td>
</tr>
<tr>
<td>GSF</td>
<td>Gross Square Feet</td>
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<tr>
<td>NAGPRA</td>
<td>Native American Graves Protection and Repatriation Act</td>
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<tr>
<td>NCA</td>
<td>National Cemetery Administration</td>
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<td>National Cemetery of the Alleghenies</td>
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<td>NEPA</td>
<td>National Environmental Policy Act</td>
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<td>Natural Resource Conservation Service</td>
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<td>National Register of Historic Places</td>
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<td>NWI</td>
<td>National Wetlands Inventory</td>
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<td>PA</td>
<td>Pennsylvania</td>
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<td>Pennsylvania Department of Environmental Protection</td>
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<td>PASDA</td>
<td>Pennsylvania Spatial Data Access</td>
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<td>PEM</td>
<td>Palustrine Emergent Wetland</td>
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<td>PFBC</td>
<td>PA Fish and Boat Commission</td>
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<tr>
<td>PFO</td>
<td>Palustrine Forested Wetland</td>
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<tr>
<td>PGC</td>
<td>PA Game Commission</td>
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<tr>
<td>PHMC</td>
<td>Pennsylvania Historical and Museum Commission</td>
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<td>PJD</td>
<td>Preliminary Jurisdictional Determination</td>
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<td>PNDI</td>
<td>Pennsylvania Natural Diversity Inventory</td>
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<td>PNHP</td>
<td>Pennsylvania Natural Heritage Program</td>
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<td>RAR</td>
<td>Resource Avoidance Report</td>
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<td>Site-Specific Environmental Assessment</td>
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1 INTRODUCTION

This Resource Avoidance Report (RAR) has been prepared for the U.S. Department of Veterans Affairs (VA) proposed expansion of the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Cecil Township, Washington County, Pennsylvania, 15017 (Figure 1). As part of the proposed Master Plan for NCOTA (VA, 2017), new burial capacity and other physical infrastructure would be developed within a portion of the original Phase 2 development area, and future phases of development would be planned for south of Morgan Road. The proposed Master Plan expansion would extend the longevity of NCOTA for Veterans and their eligible family members in southwestern Pennsylvania.

The purpose of this RAR is to identify the natural and physical site resources within the proposed expansion areas. The RAR also identifies applicable permits that define existing preservation areas and specify the mitigation that is required in the event that the site resources are impacted by the proposed expansion project. The Study Area for the proposed expansion area was approximately 156 acres.

In 2001, the NCA completed a Site-Specific Environmental Assessment (2001 SEA) that analyzed the initial site selection and the reasonably foreseeable impacts associated with the phased construction and operation of a new national cemetery in Washington County, Pennsylvania (PA). The purpose of the 2001 SEA was to determine the potential environmental and socioeconomic impacts of constructing and operating a new national cemetery in the Pittsburgh, PA, area. The 2001 SEA concluded that no significant impacts on the human environment would result, and the VA issued a Finding of No Significant Impact (FONSI) accordingly.

The cemetery was constructed and opened in Bridgeville, PA, in August 2008, and is formally known as the National Cemetery of the Alleghenies. The cemetery sits on 292 acres, approximately 20 miles southwest of downtown Pittsburgh; Morgan Road bisects the northern and southern portions of the property. The Phase 1 area of the original Master Plan included construction of an 11,400-gross-square-feet (gsf) administration/maintenance building and a 3,100-gsf public information center. In addition, the design included an entrance feature, a flag/assembly area, and two committal service shelters, each of which was approximately 600 gsf and included a utility and storage closet. Related site work including grading, internal roads, parking, and utilities was accomplished in Phase 1. During Phase 1, approximately 3,000 columbarium niches and 10,000 gravesites were constructed. Soon after completion in August 2008, the VA identified the need to continue expanding beyond the Phase 1 cemetery capacity. A Supplemental Site-Specific Environmental Assessment (SSEA) was published in February 2015 to analyze impacts associated with Phase 2 construction according to the original Master Plan.

In 2017, the VA National Cemetery Administration began developing a new Master Plan for the proposed expansion in the northern portion (Phase 2 Expansion) and for the potential full buildout of future cemetery phases in the portion of the property located south of Morgan Road (Southern Expansion). Accordingly, an SEA is being prepared to analyze and evaluate the potential effects of the implementation of the 2017 Master Plan. Specifically, the SEA evaluates the construction and operation of the proposed Phase 2 Expansion and the potential full buildout of the Southern Expansion of the 2017 Master Plan.

During development and review of the Draft 2018 SEA, NCA contacted federal, state, and local agencies with interest or oversight responsibilities regarding the Proposed Action. Additionally, the NCA consulted with federally recognized Native American tribes in accordance with the National Environmental Policy Act (NEPA), the National Historic Preservation Act (NHPA), the Native American Graves Protection and Repatriation Act (NAGPRA), and Executive Order 13175. The VA identified Native American tribes as having possible ancestral ties to Washington County, PA, and invited each tribe to consult on this Proposed Action.
2 RESOURCE ANALYSIS

2.1 Wetlands and Waters of the US

The USACE has regulatory jurisdiction over Waters of the United States, including wetlands pursuant to Section 404 of the Clean Water Act and Navigable Waters of the United States pursuant to Section 10 of the 1899 Rivers and Harbors Act. Jurisdictional wetlands are delineated based upon the presence of hydric soils, hydrologic indicators, and hydrophytic vegetation in accordance with the Regional Supplement to the Corps of Engineers Wetlands Delineation Manual for the Eastern Mountains and Piedmont Region (USACE 2010) and Classification of Wetlands and Deepwater Habitats of the United States (Cowardin et al. 1979). In Pennsylvania, wetlands and streams are potentially regulated under Title 25, Pennsylvania Code, Section 105, Dam Safety and Water Management as Regulated Waters of this Commonwealth (Commonwealth of PA, 2018c).

The USACE issued a Preliminary Jurisdictional Determination (PJD) (LRP-2017-1438) for the property on October 16, 2017 (Appendix A).

In 2002, Civil & Environmental Consultants, Inc. (CEC) completed a Wetland and Stream Delineation for the property in accordance with the U.S. Army Corps of Engineers’ (USACE) Wetland Delineation Manual, Technical Report Y-87-1 and using wetland criteria detailed in the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region (Version 2.0) (Environmental Laboratory, 1987; USACE, 2012). CEC identified 17 separate wetland areas ranging in size from 0.1 to 0.98 acre and totaling 2.44 acres, and 1,230 linear feet of streams. A USACE Regulatory Guidance Letter for Jurisdictional Determination, dated June 26, 2008, determined that these wetlands may be jurisdictional waters of the United States and could, therefore, be subject to USACE oversight under Section 404 of the Clean Water Act (CWA).

In 2017 ESC Mid-Atlantic, LLC (ESC) completed a Wetland and Stream Delineation for the portion of the property south of Morgan Road in accordance with the aforementioned USACE requirements (Environmental laboratory, 1987; USACE, 2012). ESC identified eight separate wetland areas ranging in size from 0.01 to 0.44 acre and totaling 1.22 acres, and one stream totaling 1,520 linear feet of streams (Appendix B).

ESC identified seven palustrine emergent (PEM) wetlands, one palustrine forested (PFO) wetland, and one perennial stream located in unimproved grass covered and partially wooded land. All of the wetlands are associated with the perennial stream, and are located in the southern portion of the Study Area. Hydrological features within the Study Area are governed primarily by site topography. The primary hydrological sources for the wetland areas are seeps originating upslope or within the wetland areas, concentration of surface flows in low lying areas, and an onsite perennial stream.

A USACE Regulatory Guidance Letter for Jurisdictional Determination, dated October 16, 2017, determined that these wetlands may be jurisdictional waters of the United States and could, therefore, be subject to USACE oversight under Section 404 of the Clean Water Act (CWA) (Appendix C).

Figure 2 shows the PADEP Chapter 93 (Commonwealth of PA, 2018b) regulated streams and the United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) wetlands (USFWS, 2018c). No PADEP Chapter 93 streams were identified within the Study Area. One NWI wetland was identified within the northeastern portion of the Study Area in mixed forest. This wetland was classified as R5UBH: Riverine, Unknown Perennial, Unconsolidated Bottom, Permanently Flooded.

None of the previously delineated wetlands are located within the footprint of the proposed Phase 2 disturbance actions.

2.2 Floodplains

Based on review of available Federal Emergency Management Agency (FEMA) Flood Zone Maps (Figure 3), no parts of the Study Area are located within any 100-year or 500-year floodplains (FEMA, 2015).
2.3 Cultural Resources

Cultural resources are generally defined as the physical remains of a people’s way of life and include historical architecture and archaeology. The baseline age established by the NHPA for historic resources is 50 years of age or older. Although the National Cemetery of the Alleghenies is not 50 years of age, the National Park Service (NPS) has determined that all National Cemeteries are exceptionally significant places that are eligible for listing in the National Register of Historic Places (NRHP). However, the NPS has provided guidance that unimproved portions of a National Cemetery that have only been set aside for future use and not ready to receive burials are not eligible for the NRHP.

2.3.1 Cultural Resources Surveys

A Phase I Cultural Resources Survey and a Phase II Archaeological Survey were previously conducted at the NCOTA property. The goals of these surveys were to (1) determine the presence or absence of previously identified archaeological or historic architectural resources in the project’s area of potential effect (APE); (2) identify in preliminary fashion the presence of any historic architectural resources within the APE that are potentially eligible for inclusion in the NRHP; and (3) establish the potential of the project APE to contain archaeological sites not previously identified. The Phase I investigation consisted of an examination of all site files, maps, and previous cultural resource investigation reports for the project tract and adjacent areas at the Pennsylvania Historical and Museum Commission (PHMC) and the Carnegie Museum of Natural History. In addition, all relevant historical sources (i.e., maps, atlases, county and local histories, etc.) at various local repositories were reviewed. Phase I field methodology included surface surveillance, ground penetrating radar (GPR), surface collection, and the excavation of shovel test probes. All work was performed pursuant to the NHPA, and the ACHP’s “Protection of Historic Properties” (36 CFR 800). This work was also conducted pursuant to the PHMC, Bureau of Historic Preservation (BHP) Guidelines for Archaeological Investigations (1991), and the Pennsylvania History Code (37 Pa. C.S.A. Section 101 et seq.).

Background research conducted in association with Phase I revealed two historic properties that are over 50 years old, William D. Morgan Farmstead and Robert L. Morgan Farmstead (both determined not eligible for the NRHP); and two previously recorded archaeological sites (the Morgan Site #1 [36WH417], a prehistoric archaeological site of unknown cultural affiliation; and the Tombstone Site [36WH153], a small, 1782 historic family cemetery with a prehistoric component) located within the APE. The field survey for Phase I identified six cultural resources: the two previously recorded historic farmsteads, the two previously recorded archaeological sites, and two newly identified prehistoric archaeological sites.

During the Phase I field survey, the Morgan Site was re-identified and two new sites, Morgan #2 Site (36WH1371) and Morgan #3 Site (36WH1372), were discovered in the APE. GPR was used to determine the current boundaries of the previously recorded Tombstone Site (36WH153), a late eighteenth-century family cemetery, situated roughly 250 feet south of Morgan Road.

The Tombstone Site (36WH153) is identifiable by four inscribed granite monuments on a plot that measures 66 feet by 66 feet. The inscriptions on the granite monuments identify a total of 64 individuals who were interred there between 1787 and 1836. Based on the results of the GPR, a high probability exists that human burials were located beyond the boundaries marked by the granite markers. The GPR identified an area of disturbance of irregular shape measuring 150 x 150 feet. Refer to the Phase I report (Davis et. Al, 2003) in regard to the GPR and relocation efforts undertaken by the contractor who conducted the surveys on the subject of the Tombstone Site (36WH153). It was recommended that the Tombstone Site (36WH153) be excluded from all future ground disturbing activities; subsequently, this was acknowledged and agreed upon by the PHMC/BHP in a letter dated December 16, 2003. As a protective measure, the 2017 Master Plan includes a 75-foot buffer around the boundary of the Tombstone Site.

1 Both farm complexes were part of a Historic Resources Survey and Determination of Eligibility Report in 1999 as part of the Southern Beltway Transportation Project. The BHP PHMC determined that they were not eligible for listing in the NRHP because they lacked integrity (ER #89-1278-042-S and ER #89-1378-042-W).
The Phase II Archaeological Survey was conducted to determine the potential for National Register eligibility for these sites. Based on the Phase II Archaeological Survey, the Morgan Site (36WH417), Morgan #2 Site (36WH1371) and Morgan #3 Site (36WH1372), were determined not to be eligible for listing on the National Register for Historic Places. No further work was recommended. Morgan Site #1, #2 and #3 no longer exist due to development.

Conclusions concerning cultural resources for the Phase I and Phase II surveys were coordinated with the BHP and PHMC. No further work was recommended for the NCOTA.

2.3.2 Native American Resources and Consultation

For all federally proposed actions, federal agencies are required to consult with federally recognized Native American Tribes in accordance with NEPA, the NHPA, the NAGPRA, and EO 13175. No Traditional Cultural Properties or Native American sacred places are currently known to exist within the study area.

As part of the 2018 SEA, the VA will consult with eight (8) federally-recognized Native American tribes as part of the NEPA process. These tribes were identified as having possible interest in the project area. As part of the public outreach effort, letters will be disseminated to these Native American tribes to solicit their interest in the proposed action.

2.4 Karst Topography, Sinkholes, and Depressions

Sinkholes are common where the subsurface rock formations are comprised of limestone, carbonate rock, or other surface that can dissolve by groundwater. According to the Pennsylvania Department of Conservation and Natural Resources shapefiles (PADNR, 2009) there is no Karst Topography, Sinkholes, or Depressions within the Study Area (Figure 4). Additionally, a geotechnical investigation involving subsurface borings and test pits within the southern portion of the property was conducted in October, 2017. No karst or sinkholes were identified.

2.5 Slopes

Slopes on the site were mapped based on USGS topographic data (Figure 5). Slope classes mapped on Figure 6 are 0-0.25%, 0.25-1%, 1-3%, 3-10%, 10-15%, and greater than 15% grade. Section 10.6 (Grading Guidelines) from the latest NCA Design Guidelines (November 2016) has a requirement that interment areas be located on slopes of 15% or less. These same design guidelines establish a maximum slope of 25% for mowed slopes. There are areas identified throughout the Study Area with slopes that are above a 15% grade.

2.6 Soils

Soil information was obtained from the United States Department of Agriculture – Natural Resources Conservation Service (USDA-NRCS, 2018). The site includes soils of the Dormont-Culleoka association. These soils are generally moderately well drained to well drained, and moderately deep to deep-with-a-gently-sloping-to-stEEP topography. Dormont soils predominate on hillsides and have a seasonal high-water table depth of 2- to 2.5-feet. Culleoka soils predominate on ridges and hilltops and are generally deep and well drained. Based on the USDA-NRCS mapping, Dormont silt loam, 15 to 25 percent slopes (DoD), and Fluvaquents, loamy (Fa), are classified as hyrdic soils (Figure 6). A description of each mapped soil unit is provided in the following list.

**Brooke silty clay loam (BoB):** The Brook series consists of moderately deep and well drained soils with slopes ranging from 3 to 8 percent. Brooke soils are found on hills. Parent material is clayey residuum weathered from limestone and shale. The available water to a depth of 60 inches in Brooke soils is low. There is no zone of water saturation within a depth of 72 inches. This soil does not meet hydric criteria.

**Culleoka channery silt loam (CaB, CaC, and CaD):** The Culleoka series consists of moderately steep, well drained soils with slopes ranging from 3 to 25 percent. Culleoka soils are found on hills on uplands. Parent material is fine-loamy residuum weathered from sandstone and shale. The available water to a depth of 60 inches in Culleoka soils is low. There is no zone of water saturation within a depth of 72 inches. These soils do not meet hydric criteria.
Dormont silt loam (DoB, DoC, and DoD): The Dormont series consists of deep and moderately well drained soils with slopes ranging from 3 to 25 percent. Parent material is fine-loamy residuum weathered from limestone, sandstone, and shale. The available water to a depth of 60 inches in Dormont soils is moderate. A seasonal zone of water saturation is at 31 inches during January through April. These soils do not meet hydric criteria.

Fluvaquents (Fa): The Fluvaquents series consists of deep and poorly drained soils with slopes ranging from 0 to 3 percent. Fluvaquents soils are found on flood plains. Parent material is alluvium. The available water to a depth of 60 inches in Fluvaquents soils is moderate. A seasonal zone of water saturation is at 6 inches during January through May and October through December. These soils meet hydric criteria.

Guernsey silt loam (GeB, GeC, and GeD): The Guernsey series consists of deep and moderately well drained soils with slopes ranging from 3 to 25 percent. Guernsey soils are found on ridges on hills. Parent material is colluvium derived from limestone and shale over residuum weathered from limestone and shale. The available water to a depth of 60 inches in Guernsey soils is high. A seasonal zone of water saturation is at 22 inches during January through April. These soils do not meet hydric criteria.

The following table summarizes the acreage of the mapped soil units within the Study Area.

<table>
<thead>
<tr>
<th>Soil Map Unit</th>
<th>Soil Map Unit Name</th>
<th>Drainage Class</th>
<th>Hydric (Y/N)</th>
<th>Acres within Study Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>BoB</td>
<td>Brooke silty clay loam, 3 to 8 percent slopes</td>
<td>Well drained</td>
<td>N</td>
<td>1.0</td>
</tr>
<tr>
<td>CaB</td>
<td>Culleoka channery silt loam, 3 to 8 percent slopes</td>
<td>Well drained</td>
<td>N</td>
<td>6.1</td>
</tr>
<tr>
<td>CaC</td>
<td>Culleoka channery silt loam, 8 to 15 percent slopes</td>
<td>Well drained</td>
<td>N</td>
<td>55.4</td>
</tr>
<tr>
<td>CaD</td>
<td>Culleoka channery silt loam, 15 to 25 percent slopes</td>
<td>Well drained</td>
<td>N</td>
<td>27.4</td>
</tr>
<tr>
<td>DoB</td>
<td>Dormont silt loam, 3 to 8 percent slopes</td>
<td>Moderately well drained</td>
<td>N</td>
<td>9.6</td>
</tr>
<tr>
<td>DoC</td>
<td>Dormont silt loam, 8 to 15 percent slopes</td>
<td>Moderately well drained</td>
<td>N</td>
<td>29.1</td>
</tr>
<tr>
<td>DoD</td>
<td>Dormont silt loam, 15 to 25 percent slopes</td>
<td>Moderately well drained</td>
<td>Y</td>
<td>3.2</td>
</tr>
<tr>
<td>Fa</td>
<td>Fluvaquents, loamy</td>
<td>Poorly drained</td>
<td>Y</td>
<td>4.6</td>
</tr>
<tr>
<td>GeB</td>
<td>Guernsey silt loam, 3 to 8 percent slopes</td>
<td>Moderately well drained</td>
<td>N</td>
<td>9.8</td>
</tr>
<tr>
<td>GeC</td>
<td>Guernsey silt loam, 8 to 15 percent slopes</td>
<td>Moderately well drained</td>
<td>N</td>
<td>8.9</td>
</tr>
<tr>
<td>GeD</td>
<td>Guernsey silt loam, 15 to 25 percent slopes</td>
<td>Moderately well drained</td>
<td>N</td>
<td>0.1</td>
</tr>
<tr>
<td>Web</td>
<td>Weikert-Culleoka complex, 3 to 8 percent slopes</td>
<td>Somewhat excessively drained</td>
<td>N</td>
<td>0.4</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>155.9</strong></td>
</tr>
</tbody>
</table>

2.7 Flora and Fauna

Federally-listed species are those plants and animals protected by the Federal government pursuant to the Endangered Species Act of 1973, as amended. Federally-listed species are classified as endangered or threatened. State-listed species are those plants and animals managed by the Commonwealth of Pennsylvania pursuant to Title 30, Chapter 75: Fish and Boat Code (fish, amphibians, reptiles, and aquatic organisms), Title 34, Chapter 133: Game and Wildlife Code (wild birds and mammals), and Title 17, Chapter 45: Conservation of Wild Plants (native plant species). State-listed species are classified as endangered, threatened, and species of special concern.

The potential for state- and/or federally-listed plant and animal species occurring within the study area was assessed via the Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Tool on April 5, 2018. The
PNDI environmental review for the Proposed Action (e.g. implement the 2017 Master Plan) states that, based on PNDI records, the PA Department of Conservation and Natural Resources (DCNR), and PA Fish and Boat Commission (PFBC) have not identified any known anticipated impact on threatened and endangered species and/or special concern species and resources, and that no further review action is required.

According to the PNDI environmental review, the PA Game Commission’s (PGC) response to the Proposed Action is that it could have potential impacts to state- and federally-listed species which are under the jurisdiction of both the PGC and the USFWS. The PGC defers comments on potential impacts to federally listed species to USFWS. According to the PNDI environmental review, USFWS response to the Proposed Action is that it the proposed project is within the vicinity of known northern long-eared bats maternity roost trees. To avoid prohibited incidental take of northern long-eared bats during the pup season, no tree removal – which includes cutting down, harvesting, destroying, trimming or manipulating of trees, saplings, or snags – shall occur from June 1 to July 31. If avoidance measures are implemented, no further consultation or coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) is required. The PNDI receipt must be signed by the applicant stating that they acknowledge, and will adhere to, the seasonal tree clearing restriction.

Furthermore, no state- or federally protected species were observed by AECOM biologists during the site reconnaissance visit on April 13, 2018. The protected species information from the PNDI and USFWS is included in Appendix D.

The following sections discuss the findings of the flora and fauna research.

2.8 Land Use and Vegetative Cover

All vegetative habitats and land uses within the Proposed Expansion Area were classified using the Southwestern Pennsylvania Commission’s Land Use/Land Cover shapefile for Washington County, Pennsylvania shapefiles (PASDA, 2015). Wetland and surface water habitats were also classified using the U.S. Fish and Wildlife Service Classification of Wetlands and Deepwater Habitats of the United States (Cowardin et al. 1979). A list of land use and vegetative cover types present within the study area is presented in Table 2. The land use mapped within the study area are indicated in Figure 8.

2.8.1 Agricultural

The majority of the study area is comprised of agricultural land that has been primarily used for crops or open pasture. This area is dominated by orchard grass (Dactylis glomerata), with some patches of teasel (Dipsacus fullonum), plantain (Plantago sp.), Canada goldenrod (Solidago canadensis), and clover (Trifolium sp.).

Some of the agricultural land within the study area is wetland, vegetated with sweet flag (Acorus calamus), sedges (Carex sp.), common jewelweed (Impatiens capensis), reed canary grass (Phalaris arundinacea), green bulrush (Scirpus atrovirens), and broadleaf cattails (Typha latifolia).

2.8.2 Cemetery

Approximately one third of the study area is classified as cemetery. Within this area the vegetation consists of maintained lawn and minimal ornamental plantings.

2.8.3 Mixed Forest

Within this community, the dominant canopy species include red maple (Acer rubrum), white pine (Pinus strobus), black cherry (Prunus serotina), white oak (Quercus alba), and sassafras (Sassafras albidum). The understory species include Morrow’s honeysuckle (Lonicera morrowii), multiflora rose (Rosa multiflora), Allegheny blackberry (Rubus allegheniensis), greenbriar (Smilax rotundifolia), and wild grape (Vitis sp.). The groundcover is dominated by bedstraw (Galium sp.), ground ivy (Glechoma hederacea), and clover.
2.8.4 Transportation/Major Highways

Interstate 79 borders the study area to the east. Morgan Road, a two-lane rural road, passes through the approximate center of NCOTA, dividing NCOTA into northern and southern areas.

<table>
<thead>
<tr>
<th>SPC Description1</th>
<th>Approximate Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agricultural</td>
<td>92.9</td>
</tr>
<tr>
<td>Cemetery</td>
<td>52.9</td>
</tr>
<tr>
<td>Mixed Forest</td>
<td>9.9</td>
</tr>
<tr>
<td>Transportation/Major Highways</td>
<td>0.3</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>156</strong></td>
</tr>
</tbody>
</table>

1PASDA, 2015

2.9 Wildlife

During the field survey on April 13, 2018, wildlife observed within the study area included red-winged blackbird (*Agelaius phoeniceus*), red-tailed hawk (*Buteo jamaicensis*), Eastern wood pewee (*Contopus virens*), pileated woodpecker (*Dryocopus pileatus*), red-bellied woodpecker (*Melanerpes carolinus*), song sparrow (*Melospiza melodia*), white-tailed deer (*Odocoileus virginianus*), chickadee (*Poecile sp.*), American robin (*Turdus migratorius*), and American goldfinch (*Spinus tristis*).

2.9.1 Listed Species

Based on the field evaluation and the review of the listed species information contained within the various sources listed previously, it was determined that the study area contains suitable habitat for federally- and state-listed species. Table 3 below shows the listed species that have the potential to occur within the study area based on the presence of suitable habitat. Concurrence of affect determinations for federally-listed species will be sought through the NEPA process associated with the Proposed Action.

<table>
<thead>
<tr>
<th>Scientific Name</th>
<th>Common Name</th>
<th>Federal Status</th>
<th>State Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>Myotis septentrionalis</em></td>
<td>Northern long-eared bat</td>
<td>T</td>
<td>C - Rare</td>
</tr>
</tbody>
</table>

Notes:
T = Threatened; E = Endangered; SSC = Species of Special Concern; C = Candidate; NL = Not Listed

**Northern Long-Eared Bat**

The northern long-eared bat is listed as endangered by PGC and USFWS. The northern long-eared bat is characterized by its long, rounded ears that, when folded forward, extend beyond the tip of the nose. In Pennsylvania, the northern long-eared bat is found in forests. Northern long-eared bats hunt at night over small ponds, in forest clearings, at tree top level, and along forest edges. They use caves and underground mines for hibernation. Maternity roosts are located in tree cavities, under exfoliating bark, and in buildings. The primary threat to the species is white-nose syndrome, a fungus that appears on the muzzle and other parts of hibernating bats. Impacts to hibernacula and loss or degradation of summer habitat can also cause mortality in northern long-eared bats.
During the field survey on April 13, 2018, the study area was surveyed for suitable northern long-eared bat habitat. No northern long-eared bats were observed during the field survey. However, suitable habitat is available for this species within two small forested areas, totaling approximately 9.9 acres of forest, in the southwest portion of the study area.

By implementing seasonal restrictions on tree removal from June 1 to July 31, prohibited incidental take of northern long-eared bats during the pup season will be avoided. Assuming the VA will adhere to seasonal tree removal restrictions as recommended by USFWS, it was determined that the Proposed Action would not adversely affect the northern long-eared bat.

**Bald Eagle**

Although the bald eagle is no longer state or federally listed, it is still federally protected by the Bald and Golden Eagle Protection Act in accordance with 16 United States Code 668. Pursuant to USFWS bald eagle guidelines, any disturbance within 660 feet of a bald eagle nest requires additional coordination and potential permitting with the USFWS. The bald eagle typically uses riparian habitat associated with coastal areas, lake shorelines, and river banks. The nests are generally located near bodies of water that provide a dependable food source. According to the USFWS online bald eagle nesting sites locator, no nests are located within one mile of the study area and none were observed during the field survey on April 13, 2018. For these reasons, it has been determined that the Proposed Action would not adversely affect the bald eagle.

**2.9.2 Critical Habitat**

The study area was assessed for the occurrence of USFWS Critical Habitat as defined by 17 CFR 35.1532. The study area is within the distribution area of the federally-threatened northern long-eared bat (*Myotis septentrionalis*) (Figure 3). As discussed above, northern long-eared bats live in forests. By implementing seasonal restrictions on tree removal from June 1 to July 31, prohibited incidental take of northern long-eared bats during the pup season will be avoided.

**2.9.3 Overhead Utility Rights-of-Way and Access Thereto**

There is an overhead utility line crossing located in the study area south of Morgan Road. It enters the study area in the northwest corner, near Morgan Road, and continues approximately 0.3 mile to the south-southwest before exiting the study area.
3 SUMMARY: COMPOSITE RESOURCE AVOIDANCE

A USACE Regulatory Guidance Letter for Jurisdictional Determination, dated October 16, 2017, determined that eight wetlands and one stream located within the study area may be jurisdictional waters of the United States and could, therefore, be subject to USACE oversight under Section 404 of the Clean Water Act (CWA). Impacts to these resources would require a PADEP Chapter 105 Water Obstructions and Encroachments Permit and a USACE Section 404 Permit. It is anticipated that these resources will be avoided during the development of the Proposed Action.

Cultural Resource surveys identified six cultural resources: the two previously recorded historic farmsteads, the two previously recorded archaeological sites, and two newly identified prehistoric archaeological sites. It was determined that the two previously recorded historic properties, one of the previously recorded archaeological sites, and two of the newly identified prehistoric archaeological sites, were not eligible for listing on the NRHP. It is recommended that one of the previously recorded archaeological sites, the Tombstone Site (36WH153), be excluded from all future ground disturbing activities; subsequently, this was acknowledged and agreed upon by the PHMC/BHP in a letter dated December 16, 2003. Additionally, the 2017 Master Plan includes a 75-foot buffer around the boundary of the Tombstone Site.

There are areas identified throughout the study area with slopes that are above a 15% grade. In order to comply with NCA Design Guidelines it is recommended that interment areas be located on slopes of 15% or less.

The proposed expansion area is within the critical habitat distribution of the northern long-eared bat. Based on the PNDI environmental review, USFWS recommends the avoidance measure of seasonal tree clearing restrictions from June 1 to July 31 to avoid prohibited incidental take of northern long-eared bats during the pup season. If avoidance measures are implemented, no further consultation or coordination under the Endangered Species Act is required and northern long-eared bats will not be impacted.

Based upon available published data and onsite investigations, there are no anticipated soils, sinkholes, or floodplains resources that should require additional avoidance during the design and construction process for the development within the study area, according to the design presented in the 2017 Master Plan.
4 REFERENCES


FIGURES
FIGURE 2
AERIAL IMAGERY MAP


DRAWN BY: JCS DATE: 4/26/2018
APPROVED: PROJECT #: 60487539

LEGEND

STUDY AREA

TOWNSHIP BOUNDARY

STUDY AREA
ACREAGE: 155.92

WASHINGTON COUNTY
SOUTH FAYETTE TOWNSHIP
ALLEGHENY COUNTY

0 250 500 1,000 Feet

40.312781, -80.153591

40.312781, 40.153591

Y:\GIS\Projects\VA\VA CEMETERY\BRIGHTON\MXD\FIG_2_VA_CEM_AERIAL_MAP_20180425.mxd

WASHINGTON COUNTY
SOUTH FAYETTE TOWNSHIP
ALLEGHENY COUNTY

COORDINATE:
40.312781, -80.153591

FIGURE 4
NATURAL RESOURCE MAP
NATIONAL CEMETARY OF THE ALLEGHENIES
RESOURCE AVOIDANCE REPORT
U.S. DEPARTMENT OF VETERANS AFFAIRS

DRAWN BY: JCS DATE: 4/25/2018
APPROVED: PROJECT #: 65487539
FIGURE 6
SLOPE MAP
NATIONAL CEMETERY OF THE ALLEGHENIES
RESOURCE AVOIDANCE REPORT
U.S. DEPARTMENT OF VETERANS AFFAIRS

REFERENCES:
SLOPE (PERCENT RISE), NATIONAL ELEVATION DATASET (DEP), 2016.

DRAWN BY: JCS
DATE: 4/26/2018
APPROVED:
PROJECT #: 60487539

CECIL TOWNSHIP, WASHINGTON COUNTY, PENNSYLVANIA

LEGEND
SLOPE (PERCENT RISE)

- 10%

- 15%

5 - 10%

10 - 15%

1 - 5%

15+

STUDY AREA

TOWNSHIP BOUNDARY

0 - 1%

Feet

0 250 500 1,000
LEGEND

SSURGO SOIL TYPE

HYDRIC

NO

YES

STUDY AREA

TOWNSHIP BOUNDARY

LEGEND FIGURE 7

STUDY AREA

SOILS MAP SSURGO SOIL TYPE

Feet

0

250

500

1,000


Y:\GIS\Projects\VA\VA CEMETERY BRIDGEVILLE\MXDS\FIG_7_VA_CEM_SOILS_MAPS_20180424.mxd
APPENDICES
APPENDIX A

2017 EXPANSION MASTER PLAN FIGURE
**GRAVEYARD YIELD SUMMARY BY SECTION - SOUTH OF MORGAN ROAD**

<table>
<thead>
<tr>
<th>Section</th>
<th>Section</th>
<th>Gravesite Yield</th>
</tr>
</thead>
<tbody>
<tr>
<td>C23</td>
<td>1,215</td>
<td>IGC</td>
</tr>
<tr>
<td>C24</td>
<td>1,190</td>
<td>IGC</td>
</tr>
<tr>
<td>C25</td>
<td>1,220</td>
<td>IGC</td>
</tr>
<tr>
<td>C26</td>
<td>1,225</td>
<td>IGC</td>
</tr>
<tr>
<td>C27</td>
<td>1,215</td>
<td>IGC</td>
</tr>
<tr>
<td>C28</td>
<td>1,190</td>
<td>IGC</td>
</tr>
</tbody>
</table>

**NOTES:**

1. SEE DESIGN-BUILD DRAWINGS (BY OTHERS) AND PHASE 3 CONSTRUCTION DOCUMENTS FOR DETAILED ENLARGEMENTS OF DEVELOPMENT LOCATED NORTH OF MORGAN ROAD.

**ASSUMPTIONS:**

- PRE-PLACED CRYPTS ARE PITCHED NO STEEPER THAN 5%
- IN-GROUND CREMAINS ARE PITCHED NO STEEPER THAN 8%
- ROADS ARE PITCHED NO STEEPER THAN 10% (EXISTING CEMETERY IS 12% MAX.)
- 100' BURIAL SETBACK FROM THE EDGE OF MORGAN ROAD; 30' MINIMUM SETBACK FROM ALL OTHER PROPERTY LINES AND RIGHTS-OF-WAY (20' MINIMUM REQUIRED)
- 75' SETBACK AROUND EXISTING PRIVATE CEMETERY MAINTAINED. PRIOR TO DETAILED DESIGN IN THIS AREA, A THOROUGH STUDY OF THE EXTENTS OF THIS PRIVATE CEMETERY SHOULD BE COMPLETED.
- OVERHEAD ELECTRIC LINES CAN BE RELOCATED
- A NON-POTABLE WATER SOURCE FOR IRRIGATION IS VIABLE.

**CONSULTANT:**

Gordon Design Solutions, LLC
301 N. Mildred Street, Suite 1
Charles Town, WV 25414
Phone: 304-725-8456

**ARCHITECT/ENGINEER OF RECORD:**

The Oya Group
627 S. Broad Street
Charles Town, WV 25414
Phone: 304-725-8456

**OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT:**

VA - U.S. Department of Veterans Affairs

**PREFERRED DEVELOPMENT PLAN MASTER PLAN - ENLARGEMENT**

**NATIONAL CEMETERY OF THE ALLEGHENIES**

**DRAWING NUMBER:**

VA FORM 08-6231

**DRAWING DATE:**

FEBRUARY 5, 2018

**ISSUED TO:**

WASHINGTON COUNTY, PENNSYLVANIA

**REVISION:**

VA

**ELECTRICAL PRINT:**

G-502

**ENG. REG. NO.:**

APPENDIX B

WATERS OF THE U.S. DELINEATION REPORT
WATERS OF THE U.S. DELINEATION REPORT

NATIONAL CEMETERY OF THE ALLEGHENIES
1139 MORGAN ROAD
CECIL TOWNSHIP  WASHINGTON COUNTY  PENNSYLVANIA

ECS PROJECT NO. 47:4518

FOR

WILLIAM H. GORDON ASSOCIATES, INC.

SEPTEMBER 1, 2017
September 1, 2017

Mr. Jason Gerhart, PE
William H. Gordon Associates, Inc.
301 N Mildred St
Charles Town, West Virginia 25414

ECS Project No. 47:4518

Reference: Waters of the U.S Delineation Report, National Cemetery of the Alleghenies 1139 Morgan Road, Cecil Township, Washington County, Pennsylvania

Dear Mr. Gerhart:

ECS Mid-Atlantic, LLC (ECS) is pleased to provide you with the results of our Waters of the U.S. (WOUS) Delineation Report for the referenced site. ECS services were provided in general accordance with the Task Order issued by William H. Gordon Associates, Inc., dated July 31, 2017 and generally meet the requirements of the 1987 U.S. Army Corps of Engineers (USACE) Wetlands Delineation Manual, and on the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region, Version 2.0 dated April 2012.

If there are questions regarding this report, or a need for further information, please contact the undersigned.

Sincerely,

ECS Mid-Atlantic, LLC

Martin Ackley, CHMM, PWS
Environmental Scientist
mackley@ecslimited.com
412-206-1470

Adam Meurer, CHMM, PWS
Principal, Environmental Services
ameurer@ecslimited.com
804-353-6333
1.0 INTRODUCTION

This report presents the findings of a wetland and stream delineation conducted by ECS Mid-Atlantic, LLC (ECS) for William H. Gordon Associates, Inc. (Gordon) at the National Cemetery of the Alleghenies project located at 1139 Morgan Road Cecil Township Washington County Pennsylvania (Latitude: 40.31262 N, Longitude: -80.15968 W), and is identified by the Washington County GIS Website as Parcel No. 140-011-00-00-0026-00. The site includes approximately 116.2-acres as shown on the Site Location Map (Appendix I). The site generally consists of unimproved grass covered and partially wooded land. A single maintenance structure was observed on the property.

ECS conducted the wetland and stream delineation on August 3 and 4, 2017. The purpose of this study was to identify and delineate potentially jurisdictional Waters of the U.S. (WOUS) within the subject property. ECS identified seven palustrine emergent (PEM) wetlands, one palustrine emergent/palustrine forested (PFO) wetland, and one perennial stream within the project site which, in our professional opinion, would be considered jurisdictional by the U.S. Army Corps of Engineers.
2.0 METHODOLOGY

This wetland delineation is based on ECS' professional judgment and application of the technical criteria presented in the 1987 U.S. Army Corps of Engineers (USACE) Wetlands Delineation Manual, and on the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region, Version 2.0 dated April 2012. Wetland boundaries were delineated using the routine onsite determination method described in the USACE Manual and Regional Supplement, in conjunction with the Eastern Mountains and Piedmont 2016 Regional Wetland Plant List, and the USDA Soil Survey. Field work was completed on August 3 and 4, 2017 by Vince Humenay and Martin Ackley.

ECS completed the following tasks to identify and delineate potentially jurisdictional wetland boundaries onsite:


**Field Investigation:** ECS performed onsite wetland delineations as described above. First, site hydrology was observed and the plant community within the data plot was characterized. The dominant plant species within each community were then identified, and it was determined whether or not hydrophytic (wetland) plants dominated the plant community. The USFWS has defined five wetland plant indicator categories including:

- **Obligate wetland (OBL)** – has >99% probability of occurring in wetlands
- **Facultative wetland (FACW)** – has 66% to 99% chance of occurring in wetlands
- **Facultative (FAC)** – has 33% to 66% chance of occurring in wetlands
- **Facultative upland (FACU)** – has 1 to 33% chance of occurring in wetlands
- **Upland (UPL)** – has <1% chance of occurring in wetlands
- **No Indicator (NI)** – no wetland indicator for the specified species

Plants identified as OBL, FACW, or FAC are considered wetland plants (or hydrophytes) by USACE.

In areas determined to have hydrophytic vegetation and potential wetland hydrology, an approximately 16-20 inch soil test hole was completed with a hand auger to determine if hydric soils were present. The soil boring was also inspected to determine if indicators of wetland hydrology (inundation, soil saturation, etc.) were present.

Once an area is determined to be a wetland, further testing was performed to locate the wetland/upland (non-wetland) boundary. A second test hole was completed in the upland area to document non-wetland conditions. Wetland boundaries were marked with consecutively numbered surveyor's ribbon flags. The wetland flags were surveyed as part of this assessment.
Data forms specified in the Regional Supplement were completed for each wetland and non-wetland testhole location, referred to as data points. The data forms recorded the vegetation, soils, and hydrology observations used in making the wetland determinations. ECS did identify wetland areas during the site reconnaissance which, in our professional opinion, would be considered jurisdictional by the USACE.

2.1 Methodology for Delineating Streams

During the field evaluation for wetlands, ECS observed the site for streams that would potentially be considered jurisdictional by state and federal regulatory agencies. ECS used field indicators such as the presence of an ordinary high water mark (OHWM) and continuous bed and banks to delineate stream channels and also observed characteristics such as flow, substrate composition, presence/absence of defined bed and banks, origin of hydrologic source, presence/absence of vegetation in the stream channel, and composition and relative abundance of resident benthic macroinvertebrates to classify onsite streams into three stream types: ephemeral, intermittent, and perennial.

One stream was identified during our assessment. The stream located onsite is depicted on the Waters of the U.S. Delineation Map (Appendix IV). The stream length and classification is summarized on Table 1. Photographs of the stream is presented in Appendix III.
3.0 FINDINGS

3.1 Desktop Review

The NWI map did not depict wetlands within the project site boundaries. The USGS Canonsburg, Pennsylvania 2016 quadrangle map indicates that the project site drains to the southeast towards McPherson Creek, located to the south of the site. Elevations across the project site range from approximately 1,070 to 1,170 feet above mean sea level (MSL). The weather at the time of the site reconnaissance was approximately 80 degrees and sunny.

3.2 Site Soils

A review of the USDA Soil Survey for the project site identified nine mapping units within the site boundaries. These soil mapping units are: the Culleoka channery silt loam (3 to 8% slopes, 8 to 15% slopes, and 15 to 25% slopes), the Dormont silt loam (3 to 8% slopes, 8 to 15% slopes, and 15 to 25% slopes), Fluvaquents (loamy), and the Guernsey silt loam (3 to 8% slopes and 8 to 15% slopes). Fluvaquents (loamy) is identified as a hydric soil by the NRCS.

3.3 Waters of the U.S.

Eight potentially jurisdictional wetland areas totaling 1.22-acres and one potentially jurisdictional stream totaling 1,520-linear feet were identified and delineated within the study area. Their size and USFWS Cowardin classifications are summarized below (Table 1), and their locations are illustrated on the Waters of the U.S. Delineation Map (Appendix IV).

Hydrologic features within the ESL are governed primarily by site topography. The primary hydrological sources for the wetland areas are seeps originating upslope or within the wetland areas concentration of surface flows in low lying areas, and an onsite perennial stream.

Table 1: WOUS Summary Table

<table>
<thead>
<tr>
<th>WOUS</th>
<th>Cowardin Classification</th>
<th>Onsite Linear Feet (LF)</th>
<th>Onsite Acreage (AC)</th>
<th>Onsite Square Footage (Sq. Ft.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wetland A</td>
<td>PEM</td>
<td>-</td>
<td>0.04</td>
<td>1,949</td>
</tr>
<tr>
<td>Wetland B</td>
<td>PEM</td>
<td>-</td>
<td>0.04</td>
<td>1,717</td>
</tr>
<tr>
<td>Wetland C</td>
<td>PEM</td>
<td>-</td>
<td>0.09</td>
<td>3,933</td>
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<td>Wetland D</td>
<td>PEM</td>
<td>-</td>
<td>0.40</td>
<td>17,264</td>
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<tr>
<td>Wetland E</td>
<td>PEM</td>
<td>-</td>
<td>0.006</td>
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<td>WOUS</td>
<td>Cowardin Classification</td>
<td>Onsite Linear Feet (LF)</td>
<td>Onsite Acreage (AC)</td>
<td>Onsite Square Footage (Sq. Ft.)</td>
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<tr>
<td>--------</td>
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<td>-------------------------</td>
<td>--------------------</td>
<td>---------------------------------</td>
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<tr>
<td>Wetland F</td>
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<td>-</td>
<td>0.004</td>
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<td>Wetland G</td>
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<tr>
<td>Stream A</td>
<td>Perennial</td>
<td>1,520</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

### 3.3.1 Wetland Summary

**Wetland A:** Wetland A is a 0.04-acre PEM wetland located near the center of the subject site near an onsite access road. The wetland appears to be fed by precipitation and/or seeps originating on the adjoining slope and from Stream A. The wetland appears to drain to Stream A. Wetland A is dominated by FAC vegetative species in the herbaceous stratum. Hydrological indicators included saturation, drainage patterns, and oxidized rhizospheres on living roots. Soils within the wetland at data point one (DP-1) consisted of low chroma, silty clay soils with redoximorphic features characterized as depleted matrix soils.

**Wetland B:** Wetland B is a 0.04-acre PEM wetland located on the northern portion of the subject property. The wetland appears to be fed by seeps and from Stream A. The wetland appears to drain to Stream A. Wetland B is dominated by OBL vegetative species in the herbaceous stratum. Hydrological indicators included saturation, a high water table, and drainage patterns. Soils within the wetland at data point two (DP-2) consisted of low chroma, silty clayey soils with redoximorphic features characterized as depleted matrix soils.

**Wetland C:** Wetland C is a 0.09-acre PEM wetland located near the center of the subject site near an onsite access road. The wetland appears to be fed by seeps and from Stream A. The wetland appears to drain to Stream A. Wetland C is dominated by FACW vegetative species in the herbaceous stratum. Hydrological indicators included saturation, drainage patterns, and oxidized rhizospheres on living roots. Soils within the wetland at data point three (DP-3) consisted of low chroma, silty clay soils with redoximorphic features characterized as depleted matrix soils.

**Wetland D:** Wetland D is a 0.40-acre PEM wetland located on the northcentral portion of the subject property. The wetland appears to be fed by seeps originating within the wetland area. The wetland appears to drain to Stream A. Wetland D is dominated by FACW vegetative species in the herbaceous stratum. Hydrological indicators included surface water, high water table, saturation, and drainage patterns. Soils within the wetland at data point four (DP-4) consisted of low chroma, silty clay soils with redoximorphic features characterized as depleted matrix soils.

**Wetland E:** Wetland E is a 0.006-acre PEM wetland located on the southeastern portion of the subject property. The wetland appears to be fed by seeps originating within the wetland area and from...
Stream A. The wetland appears to drain to Stream A. Wetland E is dominated by OBL vegetative species in the herbaceous stratum. Hydrological indicators included saturation and drainage patterns. Soils within the wetland at data point five (DP-5) consisted of low chroma, silty clay soils with redoximorphic features characterized as depleted matrix soils.

**Wetland F**: Wetland F is a 0.004-acre PEM wetland located on the southeastern portion of the subject property. The wetland appears to be fed by seeps originating within the wetland area and from Stream A. The wetland appears to drain to Stream A. Wetland F is dominated by OBL vegetative species in the herbaceous stratum. Hydrological indicators included saturation and drainage patterns. Soils within the wetland at data point six (DP-6) consisted of low chroma, silty clay soils with redoximorphic features characterized as depleted matrix soils.

**Wetland G**: Wetland G is a 0.44-acre PEM wetland located on the southeastern portion of the subject property. The wetland appears to be fed by precipitation seeps originating within the wetland or on the adjoining slope, and/or from Stream A. The wetland appears to drain to Stream A. Wetland G is dominated by OBL vegetative species in the herbaceous stratum. Hydrological indicators included surface water, high water table, saturation, and drainage patterns. Soils within the wetland at data point seven (DP-7) consisted of low chroma, silty clay soils with redoximorphic features characterized as depleted matrix soils.

**Wetland H**: Wetland H is a 0.19-acre PEM/PFO wetland located on the southeastern portion of the subject property. The wetland appears to be fed by seeps originating within the wetland or on the adjoining slope. The wetland appears to drain to Stream A. Wetland H is dominated by FACW vegetative species in the herbaceous stratum. Hydrological indicators included surface water, high water table, saturation, and drainage patterns. Soils within the wetland at data point seven (DP-7) consisted of low chroma, silty clay soils with redoximorphic features characterized as depleted matrix soils.

### 3.3.2 Stream Summary

**Stream A**: Stream A is a perennial stream which bisects the northeastern portion of the project site. The stream originates on the north adjacent property and enters the subject property via a culvert beneath Morgan Road. The stream channel high water mark ranged from 0.5 to 1.0 feet deep and 2 to 4 feet across. The stream travels 1,520 feet on the subject site before flowing off-site to the south.
4.0 REGULATORY DISCUSSION

The WOUS are regulated by Sections 401 and 404 of the Clean Water Act. State and Federal law dictates that any disturbance to WOUS must be permitted through the appropriate agencies.

Upon your request, we will contact the USACE to schedule a field meeting to conduct a wetlands and Waters boundary confirmation and preliminary jurisdictional determination. This process takes an average of one to two months depending on the availability of USACE personnel.

If jurisdictional wetlands and streams are present at the site, planned land disturbance in these areas would likely require a permit from the U.S. Army Corps of Engineers and/or the Pennsylvania Department of Environmental Protection (PADEP). ECS recommends conducting a Jurisdictional Determination with the USACE. If any potential impacts are proposed, ECS recommends a Pre-Application meeting with the USACE and the PADEP at this time to coordinate follow-up efforts after the field visit in order to obtain the issuance of a JD letter from the USACE and begin the permitting process. In the interim, we recommend further review of state and federal agency records pertaining to Section 7 (Federal Endangered Species Act) and Section 106 (National Historic Preservation Act). These reviews will generally be required to verify compliance for General or Joint Permit conditions.
5.0 CONCLUSIONS

Eight potentially jurisdictional wetland areas totaling 1.22-acres and one potentially jurisdictional stream totaling 1,520-linear feet were identified and delineated within the study area. The locations and boundaries of potentially jurisdictional Waters are illustrated on the attached Waters of the U.S. Delineation Map (Appendix IV).

The flagged WOUS boundaries are subject to change during the jurisdictional determination meeting with the USACE. ECS cannot guarantee that field conditions and/or WOUS boundaries will not change over time.
Appendix I: Figures
FIGURE I: SITE LOCATION MAP
PROJECT #47:4518—NATIONAL CEMETERY OF THE ALLEGHENIES
1139 MORGAN RD, CECIL TWP., WASHINGTON COUNTY

WETLAND DELINEATION REPORT
FOR: GORDON
AUGUST 2017
SOURCE: BING MAPS

ECS MID-ATLANTIC, LLC
145 LAKE DRIVE
SUITE 102
WEXFORD, PA 15090
412-206-1470

www.ecslimited.com
FIGURE II: USGS TOPOGRAPHIC MAP

PROJECT #47:4518—NATIONAL CEMETERY OF THE ALLEGHENIES

1139 MORGAN RD, CECIL TWP., WASHINGTON COUNTY

WETLAND DELINEATION REPORT
FOR: GORDON
AUGUST 2017
SOURCE: THE USGS MAP STORE

ECS MID-ATLANTIC, LLC
145 LAKE DRIVE
SUITE 102
WEXFORD, PA 15090
412-206-1470
FIGURE III: NATIONAL WETLAND INVENTORY MAP
PROJECT #47:4518—NATIONAL CEMETERY OF THE ALLEGHENIES
1139 MORGAN RD, CECIL TWP., WASHINGTON COUNTY

WETLAND DELINEATION REPORT
FOR: GORDON
AUGUST 2017
SOURCE: USFWS WETLANDS MAPPER

ECS MID-ATLANTIC, LLC
145 LAKE DRIVE
SUITE 102
WEXFORD, PA 15090
412-206-1470

www.ecslimited.com
FIGURE IV: USDA SOILS MAP
PROJECT #47:4518—NATIONAL CEMETERY OF THE ALLEGHENIES
1139 MORGAN RD, CECIL TWP., WASHINGTON COUNTY

WETLAND DELINEATION REPORT
FOR: GORDON
AUGUST 2017
SOURCE: NRCS WEB SOIL SURVEY

ECS MID-ATLANTIC, LLC
145 LAKE DRIVE
SUITE 102
WEXFORD, PA 15090
412-206-1470

NOT TO SCALE
FIGURE V: FEMA FLOODPLAIN MAP
PROJECT #47:4518—NATIONAL CEMETERY OF THE ALLEGHENIES
1139 MORGAN RD, CECIL TWP., WASHINGTON COUNTY

WETLAND DELINEATION REPORT
FOR: GORDON
AUGUST 2017
SOURCE: FEMA

ECS MID-ATLANTIC, LLC
145 LAKE DRIVE
SUITE 102
WEXFORD, PA 15090
412-206-1470

NOT TO SCALE
Appendix II: USACE Wetland Data Forms and Stream Data Forms
Project/Site: National Cemetery of the Alleghenies  City/County: Cecil Township /Washington County  Sampling Date: 8/3/2017
Investigator(s): Vince Humenay/Marty Ackley  Section, Township, Range: Cecil Township

Landform (hillslope, terrace, etc.): Toe of Slope  Local relief (concave, convex, none): concave  Slope (%): 2
Subregion (LRR or MLRA): LRR N  Lat:  Long:  Datum:  

Soil Map Unit Name: Fluvaquents, loamy  NWI classification: PEM

Are climatic / hydrologic conditions on the site typical for this time of year?  Yes  No  (If no, explain in Remarks.)
Are Vegetation, Soil, or Hydrology significantly disturbed?  Are “Normal Circumstances” present?  Yes  No
Are Vegetation, Soil, or Hydrology naturally problematic?  (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

<table>
<thead>
<tr>
<th>Hydrophytic Vegetation Present?</th>
<th>Yes</th>
<th>No</th>
<th>Is the Sampled Area within a Wetland?</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydic Soil Present?</td>
<td>Yes</td>
<td>No</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wetland Hydrology Present?</td>
<td>Yes</td>
<td>No</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Remarks:
This data plot describes a PEM wetland (Wetland A) located at the center of the property near the onsite access road. The wetland appears to be fed by precipitation and/or seeps originating on the adjoining slope.

HYDROLOGY

<table>
<thead>
<tr>
<th>Primary Hydrology Indicators:</th>
<th>Secondary Hydrology Indicators (minimum of two required)</th>
</tr>
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<tbody>
<tr>
<td>Surface Water (A1)</td>
<td>Surface Soil Cracks (B6)</td>
</tr>
<tr>
<td>High Water Table (A2)</td>
<td>Sparsely Vegetated Concave Surface (B8)</td>
</tr>
<tr>
<td>Saturation (A3)</td>
<td>Drainage Vegetated Concave Surface (B8)</td>
</tr>
<tr>
<td>Water Marks (B1)</td>
<td>Oxidized Rhizospheres on Living Roots (C3)</td>
</tr>
<tr>
<td>Sediment Deposits (B2)</td>
<td>Presence of Reduced Iron (C4)</td>
</tr>
<tr>
<td>Drift Deposits (B3)</td>
<td>Recent Iron Reduction in Tilled Soils (C6)</td>
</tr>
<tr>
<td>Algal Mat or Crust (B4)</td>
<td>Thin Muck Surface (C7)</td>
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<tr>
<td>Iron Deposits (B5)</td>
<td>Other (Explain in Remarks)</td>
</tr>
<tr>
<td>Inundation Visible on Aerial Imagery (B7)</td>
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<tr>
<td>Water-Stained Leaves (B9)</td>
<td>Dry-Season Water Table (C2)</td>
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<tr>
<td>Aquatic Fauna (B13)</td>
<td>Crayfish Burrows (C8)</td>
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<td>Saturation Visible on Aerial Imagery (C9)</td>
</tr>
<tr>
<td></td>
<td>Stunted or Stressed Plants (D1)</td>
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<tr>
<td></td>
<td>Geomorphic Position (D2)</td>
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<td></td>
<td>Shallow Aquitard (D3)</td>
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<td>Microtopographic Relief (D4)</td>
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<td></td>
<td>FAC-Neutral Test (D5)</td>
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</table>

Field Observations:

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<tr>
<th>Surface Water Present?</th>
<th>Yes</th>
<th>No</th>
<th>Depth (inches):</th>
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<tbody>
<tr>
<td>Water Table Present?</td>
<td>Yes</td>
<td>No</td>
<td>Depth (inches):</td>
</tr>
<tr>
<td>Saturation Present?</td>
<td>Yes</td>
<td>No</td>
<td>Depth (inches): surface</td>
</tr>
</tbody>
</table>

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
### VEGETATION (Five Strata) – Use scientific names of plants.

**Sampling Point: DP-1**

#### Tree Stratum (Plot size: 30')

<table>
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<tr>
<th>#</th>
<th>Species</th>
<th>% Cover</th>
<th>Indicator Status</th>
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</thead>
<tbody>
<tr>
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<tr>
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#### Sapling Stratum (Plot size: 15')

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#### Shrub Stratum (Plot size: 15')

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#### Herb Stratum (Plot size: 5')

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<tr>
<td>3</td>
<td>Eutrochium purpureum</td>
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#### Woody Vine Stratum (Plot size: ___)

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<tr>
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</table>

#### Dominance Test worksheet:

- Number of Dominant Species: That Are OBL, FACW, or FAC: 2 (A)
- Total Number of Dominant Species Across All Strata: 2 (B)
- Percent of Dominant Species That Are OBL, FACW, or FAC: 100 (A/B)

#### Prevalence Index worksheet:

- Total % Cover of: Multiply by:
  - OBL species: 10 x 1 = 10
  - FACW species: 45 x 3 = 135
  - FAC species: 15 x 4 = 60
  - FACU species: 45 x 3 = 135
  - UPL species: 30 x 5 = 150

- Column Totals: 70 (A) 205 (B)
- Prevalence Index = B/A = 2.93

#### Hydrophytic Vegetation Indicators:

- 1 - Rapid Test for Hydrophytic Vegetation
- 2 - Dominance Test is >50%
- 3 - Prevalence Index is \( \leq 3.0 \)
- 4 - Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)
- Problematic Hydrophytic Vegetation (Explain)

### Definitions of Five Vegetation Strata:

- **Tree** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and 3 in. (7.6 cm) or larger in diameter at breast height (DBH).
- **Sapling** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and less than 3 in. (7.6 cm) DBH.
- **Shrub** – Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.
- **Herb** – All herbaceous (non-woody) plants, including herbaceous vines, regardless of size, and woody plants, except woody vines, less than approximately 3 ft (1 m) in height.
- **Woody vine** – All woody vines, regardless of height.

### Hydrophytic Vegetation Present?  Yes  No
<table>
<thead>
<tr>
<th>Depth (inches)</th>
<th>Matrix</th>
<th>Color (moist)</th>
<th>%</th>
<th>Redox Features</th>
<th>Texture</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-3</td>
<td>5YR 3/2</td>
<td>100</td>
<td></td>
<td></td>
<td>Silty</td>
<td></td>
</tr>
<tr>
<td>3-10</td>
<td>7.5YR 4/1</td>
<td>70</td>
<td>30</td>
<td>5YR 5/6</td>
<td>Clay</td>
<td></td>
</tr>
</tbody>
</table>

1Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains. 2Location: PL=Pore Lining, M=Matrix.

**Hydric Soil Indicators:**
- Histosol (A1)
- Histic Epipedon (A2)
- Black Histic (A3)
- Hydrogen Sulfide (A4)
- Stratified Layers (A5)
- 2 cm Muck (A10) (LRR N)
- Depleted Below Dark Surface (A11)
- Thick Dark Surface (A12)
- Sandy Mucky Mineral (S1) (LRR N, MLRA 147, 148)
- Sandy Gleyed Matrix (S4)
- Sandy Redox (S5)
- Stripped Matrix (S6)
- Dark Surface (S7)
- Polyvalue Below Surface (S8) (MLRA 147, 148)
- Thin Dark Surface (S9) (MLRA 147, 148)
- Loamy Gleyed Matrix (F2)
- Depleted Matrix (F3)
- Redox Dark Surface (F6)
- Depleted Dark Surface (F7)
- Redox Depressions (F8)
- Iron-Manganese Masses (F12) (LRR N, MLRA 136, 147)
- Umbric Surface (F13) (MLRA 136, 122)
- Piedmont Floodplain Soils (F19) (MLRA 147)

**Indicators for Problematic Hydric Soils:**
- 2 cm Muck (A10) (MLRA 147)
- Coast Prairie Redox (A16) (MLRA 147, 148)
- Piedmont Floodplain Soils (F19)
- Red Parent Material (TF2)
- Very Shallow Dark Surface (TF12)
- Other (Explain in Remarks)

3Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

**Restrictive Layer (if observed):**
- Type: Rock
- Depth (inches): 10

**Hydric Soil Present?**
- Yes
- No

**Remarks:**
WETLAND DETERMINATION DATA FORM – Eastern Mountains and Piedmont

Project/Site: National Cemetery of the Alleghenies  City/County: Cecil Township /Washington County  Sampling Date: 8/3/2017
Investigator(s): Vince Humenay/Marty Ackley  Section, Township, Range: Cecil Township

Landform (hillslope, terrace, etc.): Hillslope  Local relief (concave, convex, none): convex  Slope (%): 10
Subregion (LRR or MLRA): LRR N  Lat:  Long:  Datum: 

Soil Map Unit Name: Fluvaquents, loamy  NWI classification: PEM

Are climatic / hydrologic conditions on the site typical for this time of year? ☑ Yes  ☐ No (If no, explain in Remarks.)
Are Vegetation ☐, Soil ☐, or Hydrology ☐ significantly disturbed?  Are “Normal Circumstances” present? ☑ Yes  ☐ No
Are Vegetation ☐, Soil ☐, or Hydrology ☐ naturally problematic?  (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

<table>
<thead>
<tr>
<th>Hydrophytic Vegetation Present?</th>
<th>☑ Yes  ☐ No</th>
<th>Is the Sampled Area within a Wetland?</th>
<th>☑ Yes  ☐ No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydric Soil Present?</td>
<td>☑ Yes  ☐ No</td>
<td>Wetland Hydrology Present?</td>
<td>☑ Yes  ☐ No</td>
</tr>
</tbody>
</table>

Remarks:
This data plot describes a PEM wetland (Wetland B) located on the northern portion of the property adjacent to Stream A. The wetland appears to be fed by seeps.

HYDROLOGY

Primary Hydrology Indicators:
- ☑ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☑ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Water-Stained Leaves (B9)
- ☐ Aquatic Fauna (B13)

Secondary Indicators (minimum of two required):
- ☐ Surface Soil Cracks (B6)
- ☑ Sparsely Vegetated Concave Surface (B8)
- ☐ Drainage Patterns (B10)
- ☐ Moss Trim Lines (B16)
- ☐ Dry-Season Water Table (C2)
- ☐ Crayfish Burrows (C8)
- ☑ Saturation Visible on Aerial Imagery (C9)
- ☐ Stunted or Stressed Plants (D1)
- ☑ Geomorphic Position (D2)
- ☐ Shallow Aquitard (D3)
- ☑ Microtopographic Relief (D4)
- ☑ FAC-Neutral Test (D5)

Field Observations:
- Surface Water Present? ☐ Yes  ☑ No  Depth (inches): 
- Water Table Present? ☑ Yes  ☐ No  Depth (inches): 1*
- Saturation Present? ☑ Yes  ☐ No  Depth (inches): surface

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
### VEGETATION (Five Strata) – Use scientific names of plants.

<table>
<thead>
<tr>
<th>Tree Stratum (Plot size: 30')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td></td>
<td></td>
<td>Total Cover</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sapling Stratum (Plot size: 15')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td></td>
<td></td>
<td>Total Cover</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Shrub Stratum (Plot size: 15')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td></td>
<td></td>
<td>Total Cover</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Herb Stratum (Plot size: 5')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Typha Latifolia</td>
<td>75</td>
<td>Y</td>
<td>OBL</td>
</tr>
<tr>
<td>2. Scirpus atrovirens</td>
<td>5</td>
<td>N</td>
<td>OBL</td>
</tr>
<tr>
<td>3. Dipsacus fullonum</td>
<td>5</td>
<td>N</td>
<td>FACU</td>
</tr>
<tr>
<td>4. Solidago canadensis</td>
<td>5</td>
<td>N</td>
<td>FACU</td>
</tr>
<tr>
<td>5.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td></td>
<td></td>
<td>Total Cover</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Woody Vine Stratum (Plot size: )</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12.</td>
<td>90</td>
<td></td>
<td>Total Cover</td>
</tr>
</tbody>
</table>

**Dominance Test worksheet:**
- Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)
- Total Number of Dominant Species Across All Strata: 1 (B)
- Percent of Dominant Species That Are OBL, FACW, or FAC: 100 (A/B)

**Prevalence Index worksheet:**
- Total % Cover of: Multiply by:
  - OBL species 80 x 1 = 80
  - FACW species _____ x 2 = _____
  - FAC species _____ x 3 = _____
  - FACU species 10 x 4 = 40
  - UPL species _____ x 5 = _____
- Column Totals: 90 (A) 120 (B)
- Prevalence Index = B/A = 1.33

**Hydrophytic Vegetation Indicators:**
- 1 - Rapid Test for Hydrophytic Vegetation
- 2 - Dominance Test is >50%
- 3 - Prevalence Index is ≤3.0
- 4 - Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)
- Problematic Hydrophytic Vegetation (Explain)

1 Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

**Definitions of Five Vegetation Strata:**
- **Tree** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and 3 in. (7.6 cm) or larger in diameter at breast height (DBH).
- **Sapling** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and less than 3 in. (7.6 cm) DBH.
- **Shrub** – Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.
- **Herb** – All herbaceous (non-woody) plants, including herbaceous vines, regardless of size, and woody plants, except woody vines, less than approximately 3 ft (1 m) in height.
- **Woody vine** – All woody vines, regardless of height.

**Hydrophytic Vegetation Present?** Yes No

Remarks: (Include photo numbers here or on a separate sheet.)
### Soil Profile Description

(Describe to the depth needed to document the indicator or confirm the absence of indicators.)

<table>
<thead>
<tr>
<th>Depth (inches)</th>
<th>Color (moist)</th>
<th>%</th>
<th>Color (moist)</th>
<th>%</th>
<th>Type</th>
<th>Loc</th>
<th>Texture</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-3</td>
<td>10YR 4/1</td>
<td>100</td>
<td></td>
<td></td>
<td>Silty Clay</td>
<td>Silty Clay</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3-9</td>
<td>2.5Y 5/1</td>
<td>90</td>
<td>2.5Y 6/6</td>
<td>10</td>
<td>Silty Clay</td>
<td>Silty Clay</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.
2. Location: PL=Pore Lining, M=Matrix.

### Hydric Soil Indicators:

- Histosol (A1)
- Histic Epipedon (A2)
- Black Histic (A3)
- Hydrogen Sulfide (A4)
- Stratified Layers (A5)
- 2 cm Muck (A10) (LRR N)
- Depleted Below Dark Surface (A11)
- Thick Dark Surface (A12)
- Sandy Mucky Mineral (S1) (LRR N, MLRA 147, 148)
- Sandy Gleyed Matrix (S4)
- Sandy Redox (S5)
- Stripped Matrix (S6)
- Dark Surface (S7)
- Polyvalue Below Surface (S9) (MLRA 147, 148)
- Thin Dark Surface (S9) (MLRA 147, 148)
- Loamy Gleyed Matrix (F2)
- Depleted Matrix (F3)
- Redox Dark Surface (F6)
- Depleted Dark Surface (F7)
- Redox Depressions (F8)
- Iron-Manganese Masses (F12) (LRR N, MLRA 136)
- Umbric Surface (F13) (MLRA 136, 122)
- Piedmont Floodplain Soils (F19) (MLRA 148)
- 2 cm Muck (A10) (MLRA 147)
- Coast Prairie Redox (A16) (MLRA 147, 148)
- Piedmont Floodplain Soils (F19) (MLRA 136, 147)
- Red Parent Material (TF2)
- Very Shallow Dark Surface (TF12)
- Other (Explain in Remarks)

3. Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

### Restrictive Layer (if observed):

Type: Rock

Depth (inches): 9'

Hydric Soil Present? ☒ Yes ☐ No

Remarks:
WETLAND DETERMINATION DATA FORM – Eastern Mountains and Piedmont

Project/Site: National Cemetery of the Alleghenies  
City/County: Cecil Township /Washington County  
Sampling Date: 8/3/2017

State: PA  
Sampling Point: DP-3

Investigator(s): Vince Humenay/Marty Ackley  
Section, Township, Range: Cecil Township

Landform (hillslope, terrace, etc.): Toe of Slope  
Local relief (concave, convex, none): concave  
Slope (%): 5

Subregion (LRR or MLRA): LRR N  
Lat: _____  
Long: _____  
Datum: _____

Soil Map Unit Name: Fluvaquents, loamy  
NWI classification: PEM

Are climatic / hydrologic conditions on the site typical for this time of year?  
☐ Yes  ☐ No (If no, explain in Remarks.)

Are Vegetation, Soil, or Hydrology significantly disturbed?  
Are “Normal Circumstances” present?  
☐ Yes  ☐ No

Are Vegetation, Soil, or Hydrology naturally problematic?  
(If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

| Hydrophytic Vegetation Present? | ☒ Yes  ☐ No | Is the Sampled Area within a Wetland?  
|---------------------------------|-------------|--------------------------------------|
| Hydric Soil Present? | ☒ Yes  ☐ No | Is the Sampled Area within a Wetland?  
| Wetland Hydrology Present? | ☒ Yes  ☐ No | Is the Sampled Area within a Wetland?  

Remarks:

This data plot describes a PEM wetland (Wetland C) located near the center of the property. The wetland appears to be fed by seeps.

HYDROLOGY

<table>
<thead>
<tr>
<th>Wetland Hydrology Indicators:</th>
<th>Secondary Indicators (minimum of two required)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Surface Water (A1)</td>
<td>☐ True Aquatic Plants (B14)</td>
</tr>
<tr>
<td>☐ High Water Table (A2)</td>
<td>☐ Hydrogen Sulfide Odor (C1)</td>
</tr>
<tr>
<td>☒ Saturation (A3)</td>
<td>☐ Oxidized Rhizospheres on Living Roots (C3)</td>
</tr>
<tr>
<td>☐ Water Marks (B1)</td>
<td>☐ Presence of Reduced Iron (C4)</td>
</tr>
<tr>
<td>☐ Sediment Deposits (B2)</td>
<td>☐ Recent Iron Reduction in Tilled Soils (C6)</td>
</tr>
<tr>
<td>☐ Drift Deposits (B3)</td>
<td>☐ Thin Muck Surface (C7)</td>
</tr>
<tr>
<td>☐ Algal Mat or Crust (B4)</td>
<td>☐ Other (Explain in Remarks)</td>
</tr>
<tr>
<td>☐ Iron Deposits (B5)</td>
<td>☐ Inundation Visible on Aerial Imagery (B7)</td>
</tr>
<tr>
<td>☐ Water-Stained Leaves (B9)</td>
<td>☐ Aquatic Fauna (B13)</td>
</tr>
<tr>
<td>☐ Sediment Deposits (B2)</td>
<td>☐ Recent Iron Reduction in Tilled Soils (C6)</td>
</tr>
<tr>
<td>☐ Drift Deposits (B3)</td>
<td>☐ Thin Muck Surface (C7)</td>
</tr>
<tr>
<td>☐ Algal Mat or Crust (B4)</td>
<td>☐ Other (Explain in Remarks)</td>
</tr>
</tbody>
</table>

Field Observations:

<table>
<thead>
<tr>
<th>Surface Water Present?</th>
<th>☐ Yes  ☒ No</th>
<th>Depth (inches):</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water Table Present?</td>
<td>☒ Yes  ☐ No</td>
<td>Depth (inches): 10”</td>
</tr>
<tr>
<td>Saturation Present?</td>
<td>☒ Yes  ☐ No</td>
<td>Depth (inches): surface (includes capillary fringe)</td>
</tr>
</tbody>
</table>

Wetland Hydrology Present?  
☐ Yes  ☐ No

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
### VEGETATION (Five Strata) – Use scientific names of plants.

**Sampling Point: DP-3**

<table>
<thead>
<tr>
<th>Tree Stratum (Plot size: 30')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
<th>Dominance Test worksheet:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
<td>Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)</td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td>Total Number of Dominant Species Across All Strata: 1 (B)</td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
<td></td>
<td>Percent of Dominant Species That Are OBL, FACW, or FAC: 100 (A/B)</td>
</tr>
</tbody>
</table>

**Prevalence Index worksheet:**

<table>
<thead>
<tr>
<th>Total % Cover of: Multiply by:</th>
</tr>
</thead>
<tbody>
<tr>
<td>OBL species 1 x 1 = _____</td>
</tr>
<tr>
<td>FACW species 60 x 2 = 120</td>
</tr>
<tr>
<td>FAC species 10 x 3 = 30</td>
</tr>
<tr>
<td>FACU species 10 x 4 = 40</td>
</tr>
<tr>
<td>UPL species 5 x 5 = _____</td>
</tr>
</tbody>
</table>

Column Totals: 80 (A) 190 (B)

Prevalence Index = B/A = 2.38

**Hydrophytic Vegetation Indicators:**

- □ 1 - Rapid Test for Hydrophytic Vegetation
- □ 2 - Dominance Test is >50%
- □ 3 - Prevalence Index is ≤3.0
- □ 4 - Morphological Adaptations 1 (Provide supporting data in Remarks or on a separate sheet)

Diagramatic indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

**Definitions of Five Vegetation Strata:**

- **Tree** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and 3 in. (7.6 cm) or larger in diameter at breast height (DBH).
- **Sapling** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and less than 3 in. (7.6 cm) DBH.
- **Shrub** – Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.
- **Herb** – All herbaceous (non-woody) plants, including herbaceous vines, regardless of size, and woody plants, except woody vines, less than approximately 3 ft (1 m) in height.
- **Woody vine** – All woody vines, regardless of height.

**Hydrophytic Vegetation Present?** □ Yes □ No

**Remarks:** (Include photo numbers here or on a separate sheet.)
**SOIL**

**Profile Description:** (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

<table>
<thead>
<tr>
<th>Depth (inches)</th>
<th>Color (moist)</th>
<th>%</th>
<th>Color (moist)</th>
<th>%</th>
<th>Type¹</th>
<th>Loc²</th>
<th>Texture</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-5</td>
<td>7.5YR 3/2</td>
<td>100</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Silt</td>
<td>Loam</td>
</tr>
<tr>
<td>5-11</td>
<td>SYR 3/1</td>
<td>80</td>
<td>5YR 5/8</td>
<td>20</td>
<td></td>
<td></td>
<td>Silty</td>
<td>Clay</td>
</tr>
</tbody>
</table>

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains. ²Location: PL=Pore Lining, M=Matrix.

**Hydric Soil Indicators:**

- Histosol (A1)
- Histic Epipedon (A2)
- Black Histic (A3)
- Hydrogen Sulfide (A4)
- Stratified Layers (A5)
- 2 cm Muck (A10) (LRR N)
- Depleted Below Dark Surface (A11)
- Thick Dark Surface (A12)
- Sandy Mucky Mineral (S1) (LRR N, MLRA 147, 148)
- Sandy Gleyed Matrix (S4)
- Sandy Redox (S5)
- Stripped Matrix (S6)

**Indicators for Problematic Hydric Soils**: ³

- 2 cm Muck (A10) (MLRA 147)
- Coast Prairie Redox (A16) (MLRA 147, 148)
- Piedmont Floodplain Soils (F19) (MLRA 136, 147)
- Red Parent Material (TF2)
- Very Shallow Dark Surface (TF12)
- Other (Explain in Remarks)

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

**Restrictive Layer (if observed):**

Type: Rock

Depth (inches): 11”

Hydric Soil Present? ☑ Yes ☐ No

Remarks:
**WETLAND DETERMINATION DATA FORM – Eastern Mountains and Piedmont**

**Project/Site:** National Cemetery of the Alleghenies  
**City/County:** Cecil Township /Washington County  
**Sampling Date:** 8/3/2017  
**Applicant/Owner:** William H. Gordon Associates, Inc.  
**State:** PA  
**Sampling Point:** DP-4

**Investigator(s):** Vince Humenay/Marty Ackley  
**Section, Township, Range:** Cecil Township  
**Landform (hillslope, terrace, etc.):** Swale  
**Local relief (concave, convex, none):** concave  
**Slope (%):** 5

**Subregion (LRR or MLRA):** LRR N  
**Lat:** _____  
**Long:** _____  
**Datum:** _____

**Soil Map Unit Name:** Fluvaquents, loamy  
**NWI classification:** PEM

**Are climatic / hydrologic conditions on the site typical for this time of year?** ☑ Yes ☐ No (If no, explain in Remarks.)

**Are Vegetation, Soil, or Hydrology significantly disturbed?** Are “Normal Circumstances” present? ☑ Yes ☐ No

**Are Vegetation, Soil, or Hydrology naturally problematic?** (If needed, explain any answers in Remarks.)

**SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.**

<table>
<thead>
<tr>
<th>Hydrophytic Vegetation Present?</th>
<th>☑ Yes ☐ No</th>
<th>Is the Sampled Area within a Wetland?</th>
<th>☑ Yes ☐ No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydric Soil Present?</td>
<td>☑ Yes ☐ No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wetland Hydrology Present?</td>
<td>☑ Yes ☐ No</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Remarks:**  
This data plot describes a PEM wetland (Wetland D) located on the northcentral portion of the property. The wetland appears to be fed by seeps originating within the wetland.

**HYDROLOGY**

**Primary Hydrology Indicators:**

<table>
<thead>
<tr>
<th>Surface Water (A1)</th>
<th>True Aquatic Plants (B14)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>High Water Table (A2)</th>
<th>Hydrogen Sulfide Odor (C1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Saturation (A3)</th>
<th>Oxidized Rhizospheres on Living Roots (C3)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Water Marks (B1)</th>
<th>Presence of Reduced Iron (C4)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sediment Deposits (B2)</th>
<th>Recent Iron Reduction in Tilled Soils (C6)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Drift Deposits (B3)</th>
<th>Thin Muck Surface (C7)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Algal Mat or Crust (B4)</th>
<th>Other (Explain in Remarks)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
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</table>

<table>
<thead>
<tr>
<th>Iron Deposits (B5)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Inundation Visible on Aerial Imagery (B7)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Water-Stained Leaves (B9)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Aquatic Fauna (B13)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Field Observations:</th>
<th>Depth (inches): $1^*$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Water Present?</td>
<td>☑ Yes ☐ No</td>
</tr>
<tr>
<td>☑</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Water Table Present?</th>
<th>☑ Yes ☐ No</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Saturation Present?</th>
<th>☑ Yes ☐ No</th>
</tr>
</thead>
</table>

**Secondary Indicators (minimum of two required):**

<table>
<thead>
<tr>
<th>Surface Soil Cracks (B6)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sparsely Vegetated Concave Surface (B8)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Drainage Patterns (B10)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Moss Trim Lines (B16)</th>
</tr>
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<tbody>
<tr>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Dry-Season Water Table (C2)</th>
</tr>
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<tbody>
<tr>
<td>☑</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Crayfish Burrows (C8)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Saturation Visible on Aerial Imagery (C9)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Stunted or Stressed Plants (D1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Geomorphic Position (D2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Shallow Aquitard (D3)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Microtopographic Relief (D4)</th>
</tr>
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<tbody>
<tr>
<td>☑</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>FAC-Neutral Test (D5)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
</tr>
</tbody>
</table>

**Wetland Hydrology Present?** ☑ Yes ☐ No

**Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:**

**Remarks:**

---

US Army Corps of Engineers  
Eastern Mountains and Piedmont – Final
### VEGETATION (Five Strata) – Use scientific names of plants.

**Sampling Point:** DP-4

#### Tree Stratum (Plot size: 30’)

<table>
<thead>
<tr>
<th>Number</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
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<td></td>
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<tr>
<td>3</td>
<td></td>
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<td></td>
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<tr>
<td>4</td>
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<tr>
<td>5</td>
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<td></td>
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<tr>
<td>6</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>7</td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

**Dominance Test worksheet:**

- Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)
- Total Number of Dominant Species Across All Strata: 1 (B)
- Percent of Dominant Species That Are OBL, FACW, or FAC: 100 (A/B)

#### Sapling Stratum (Plot size: 15’)

<table>
<thead>
<tr>
<th>Number</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
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<tr>
<td>3</td>
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<td></td>
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<td>6</td>
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<tr>
<td>7</td>
<td></td>
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</tr>
</tbody>
</table>

**Prevalence Index worksheet:**

- Total % Cover of: Multiply by:
  - OBL species: $35 \times 1 = 35$
  - FACW species: $50 \times 2 = 100$
  - FAC species: $\_ \times 3 = \_$
  - FACU species: $\_ \times 4 = \_$
  - UPL species: $\_ \times 5 = \_$
- Column Totals: 85 (A) 135 (B)
- Prevalence Index = $B/A = 1.59$

#### Shrub Stratum (Plot size: 15’)

<table>
<thead>
<tr>
<th>Number</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
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<tr>
<td>7</td>
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</table>

#### Herb Stratum (Plot size: 5’)

<table>
<thead>
<tr>
<th>Scientific Name</th>
<th>% Cover</th>
<th>OBL/FAC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phalaris arundinacea</td>
<td>50</td>
<td>Y/FACW</td>
</tr>
<tr>
<td>Leersia oryzoides</td>
<td>15</td>
<td>N/OBL</td>
</tr>
<tr>
<td>Carex bullata</td>
<td>10</td>
<td>N/OBL</td>
</tr>
<tr>
<td>Scirpus atrovirens</td>
<td>10</td>
<td>N/OBL</td>
</tr>
<tr>
<td>5.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Herb Stratum (Plot size: 15’)

<table>
<thead>
<tr>
<th>Number</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
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<tr>
<td>7</td>
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</tr>
</tbody>
</table>

**Hydrophytic Vegetation Indicators:**

- ☑ 1 - Rapid Test for Hydrophytic Vegetation
- ☑ 2 - Dominance Test is >50%
- ☑ 3 - Prevalence Index is ≤3.0
- ☑ 4 - Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)
- ☑ Problematic Hydrophytic Vegetation (Explain)

1. Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

#### Definitions of Five Vegetation Strata:

- **Tree** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and 3 in. (7.6 cm) or larger in diameter at breast height (DBH).
- **Sapling** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and less than 3 in. (7.6 cm) DBH.
- **Shrub** – Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.
- **Herb** – All herbaceous (non-woody) plants, including herbaceous vines, regardless of size, and woody plants, except woody vines, less than approximately 3 ft (1 m) in height.
- **Woody vine** – All woody vines, regardless of height.

#### Hydrophytic Vegetation Present?

☐ Yes ☐ No

**Remarks:** (Include photo numbers here or on a separate sheet.)
### Profile Description: (Describe the depth needed to document the indicator or confirm the absence of indicators.)

<table>
<thead>
<tr>
<th>Depth (inches)</th>
<th>Color (moist)</th>
<th>%</th>
<th>Color (moist)</th>
<th>%</th>
<th>Type¹</th>
<th>Loc²</th>
<th>Texture</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-4</td>
<td>2.5YR 2.5/1</td>
<td>100</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4-10</td>
<td>5YR 2.5/1</td>
<td>90</td>
<td>5YR 5/6</td>
<td>10</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.  
²Location: PL=Pore Lining, M=Matrix.

### Hydric Soil Indicators:

- Histosol (A1)  
- Histic Epipedon (A2)  
- Black Histic (A3)  
- Hydrogen Sulfide (A4)  
- Stratified Layers (A5)  
- 2 cm Muck (A10) (LRR N)  
- Depleted Below Dark Surface (A11)  
- Thick Dark Surface (A12)  
- Sandy Mucky Mineral (S1) (LRR N, MLRA 147, 148)  
- Sandy Gleyed Matrix (S4)  
- Sandy Redox (S5)  
- Stripped Matrix (S6)  
- Dark Surface (S7)  
- Polyvalue Below Surface (S8) (MLRA 147, 148)  
- Thin Dark Gleyed Matrix (S9) (MLRA 147, 148)  
- Loamy Gleyed Matrix (F2)  
- Depleted Matrix (F3)  
- Redox Dark Surface (F6)  
- Depleted Dark Surface (F7)  
- Redox Depressions (F8)  
- Iron-Manganese Masses (F12) (LRR N, MLRA 136, 122)  
- Umbric Surface (F13) (MLRA 136, 122)  
- Piedmont Floodplain Soils (F19) (MLRA 148)  

### Indicators for Problematic Hydric Soils³:

- 2 cm Muck (A10) (MLRA 147)  
- Coast Prairie Redox (A16) (MLRA 147, 148)  
- Piedmont Floodplain Soils (F19) (MLRA 136, 147)  
- Red Parent Material (TF2)  
- Very Shallow Dark Surface (TF12)  
- Other (Explain in Remarks)

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

### Restrictive Layer (if observed):  
Type: Rock

- Depth (inches): 10”  
- Hydric Soil Present? ☑ Yes ☐ No

Remarks:
WETLAND DETERMINATION DATA FORM – Eastern Mountains and Piedmont

Project/Site: National Cemetery of the Alleghenies  City/County: Cecil Township/ Washington County  Sampling Date: 8/3/2017
Investigator(s): Vince Humenay/Marty Ackley  Section, Township, Range: Cecil Township

Landform (hillslope, terrace, etc.): Depression  Local relief (concave, convex, none): concave  Slope (%): 2
Subregion (LRR or MLRA): LRR N  Lat: _____  Long: _____  Datum: _____

Soil Map Unit Name: Fluvaquents, loamy  NWI classification: PEM

Are climatic / hydrologic conditions on the site typical for this time of year?  Yes  No  (If no, explain in Remarks.)
Are Vegetation, Soil, or Hydrology significantly disturbed? Are “Normal Circumstances” present?  Yes  No
Are Vegetation, Soil, or Hydrology naturally problematic?  (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

<table>
<thead>
<tr>
<th>Hydrophytic Vegetation Present?</th>
<th>☒ Yes  ☐ No</th>
<th>Is the Sampled Area within a Wetland?  ☒ Yes  ☐ No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydric Soil Present?</td>
<td>☒ Yes  ☐ No</td>
<td></td>
</tr>
<tr>
<td>Wetland Hydrology Present?</td>
<td>☒ Yes  ☐ No</td>
<td></td>
</tr>
</tbody>
</table>

Remarks:
This data plot describes a PEM wetland (Wetland E) located on the southeastern portion of the property. The wetland appears to be fed by seeps originating within the wetland.

HYDROLOGY

<table>
<thead>
<tr>
<th>Wetland Hydrology Indicators:</th>
<th>Secondary Indicators (minimum of two required)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Indicators (minimum of one is required; check all that apply)</td>
<td>Surface Soil Cracks (B6)</td>
</tr>
<tr>
<td>☐ Surface Water (A1)</td>
<td>☐ True Aquatic Plants (B14)</td>
</tr>
<tr>
<td>☐ High Water Table (A2)</td>
<td>☐ Hydrogen Sulfide Odor (C1)</td>
</tr>
<tr>
<td>❑ Saturation (A3)</td>
<td>☐ Oxidized Rhizospheres on Living Roots (C3)</td>
</tr>
<tr>
<td>☐ Water Marks (B1)</td>
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<td>☐ Other (Explain in Remarks)</td>
</tr>
<tr>
<td>☐ Iron Deposits (B5)</td>
<td></td>
</tr>
<tr>
<td>☐ Inundation Visible on Aerial Imagery (B7)</td>
<td></td>
</tr>
<tr>
<td>☐ Water-Stained Leaves (B9)</td>
<td></td>
</tr>
<tr>
<td>☐ Aquatic Fauna (B13)</td>
<td></td>
</tr>
</tbody>
</table>

Field Observations:

| Surface Water Present? | ☐ Yes  ☒ No  Depth (inches): _____ |
| Water Table Present? | ☐ Yes  ☒ No  Depth (inches): _____ |
| Saturation Present? (includes capillary fringe) | ☐ Yes  ☒ No  Depth (inches): surface |

Wetland Hydrology Present?  ☒ Yes  ☐ No

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
### VEGETATION (Five Strata) – Use scientific names of plants.

**Sampling Point: DP-5**

<table>
<thead>
<tr>
<th>Tree Stratum (Plot size: 30')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
<th>Dominance Test worksheet:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
<td>Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)</td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td>Total Number of Dominant Species Across All Strata: 2 (B)</td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
<td></td>
<td>Percent of Dominant Species That Are OBL, FACW, or FAC: 50 (A/B)</td>
</tr>
<tr>
<td>4.</td>
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<td>7.</td>
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</tr>
</tbody>
</table>

= Total Cover

<table>
<thead>
<tr>
<th>Sapling Stratum (Plot size: 15')</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
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<td>2.</td>
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<td>3.</td>
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<td>5.</td>
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<tr>
<td>7.</td>
</tr>
</tbody>
</table>

= Total Cover

<table>
<thead>
<tr>
<th>Shrub Stratum (Plot size: 15')</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
</tr>
<tr>
<td>2.</td>
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<tr>
<td>3.</td>
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<tr>
<td>4.</td>
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<td>6.</td>
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<tr>
<td>7.</td>
</tr>
</tbody>
</table>

= Total Cover

<table>
<thead>
<tr>
<th>Herb Stratum (Plot size: 5')</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
</tr>
<tr>
<td>2.</td>
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<td>3.</td>
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<td>4.</td>
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<td>7.</td>
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<td>8.</td>
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<tr>
<td>9.</td>
</tr>
<tr>
<td>10.</td>
</tr>
<tr>
<td>11.</td>
</tr>
<tr>
<td>12.</td>
</tr>
</tbody>
</table>

= Total Cover

| Woody Vine Stratum (Plot size: ____)| |
|------------------------------------|
| 1. |                  |     |   |     |
| 2. |                  |     |   |     |
| 3. |                  |     |   |     |
| 4. |                  |     |   |     |
| 5. |                  |     |   |     |

= Total Cover

### Prevalence Index worksheet:

<table>
<thead>
<tr>
<th>Total % Cover of:</th>
<th>Multiply by:</th>
</tr>
</thead>
<tbody>
<tr>
<td>OBL species</td>
<td>50 x 1 = 50</td>
</tr>
<tr>
<td>FACW species</td>
<td>10 x 2 = 20</td>
</tr>
<tr>
<td>FAC species</td>
<td>____ x 3 = ____</td>
</tr>
<tr>
<td>FACU species</td>
<td>20 x 4 = 80</td>
</tr>
<tr>
<td>UPL species</td>
<td>____ x 5 = ____</td>
</tr>
</tbody>
</table>

Column Totals: 80 (A) 150 (B)

Prevalence Index = B/A = 1.88

### Hydrophytic Vegetation Indicators:

- 1 - Rapid Test for Hydrophytic Vegetation
- 2 - Dominance Test is >50%
- 3 - Prevalence Index is ≤ 3.0
- 4 - Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)
- Problematic Hydrophytic Vegetation (Explain)

1Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

### Definitions of Five Vegetation Strata:

- **Tree** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and 3 in. (7.6 cm) or larger in diameter at breast height (DBH).
- **Sapling** – Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.
- **Shrub** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and less than 3 in. (7.6 cm) DBH.
- **Herb** – All herbaceous (non-woody) plants, including herbaceous vines, regardless of size, and woody plants, except woody vines, less than approximately 3 ft (1 m) in height.
- **Woody vine** – All woody vines, regardless of height.

### Hydrophytic Vegetation Present? Yes No

Remarks: (Include photo numbers here or on a separate sheet.)
**Profile Description:** (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

<table>
<thead>
<tr>
<th>Depth (inches)</th>
<th>Color (moist)</th>
<th>%</th>
<th>Color (moist)</th>
<th>%</th>
<th>Type</th>
<th>Loc</th>
<th>Texture</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-3</td>
<td>5YR 3/1</td>
<td>100</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Silty</td>
<td></td>
</tr>
<tr>
<td>3-9</td>
<td>5YR 3/1</td>
<td>90</td>
<td>5YR 4/6</td>
<td>10</td>
<td></td>
<td></td>
<td>Silty</td>
<td>Clay</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Clay</td>
<td></td>
</tr>
</tbody>
</table>

1Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.  
2Location: PL=Pore Lining, M=Matrix.

**Hydric Soil Indicators:**
- Histosol (A1)
- Histic Epipedon (A2)
- Black Histic (A3)
- Hydrogen Sulfide (A4)
- Stratified Layers (A5)
- 2 cm Muck (A10) (LRR N)
- Depleted Below Dark Surface (A11)
- Thick Dark Surface (A12)
- Sandy Mucky Mineral (S1) (LRR N, MLRA 147, 148)
- Sandy Gleyed Matrix (S4)
- Sandy Redox (S5)
- Stripped Matrix (S6)

**Indicators for Problematic Hydric Soils:**
- Dark Surface (S7)
- Polyvalue Below Surface (S8) (MLRA 147, 148)
- Thin Dark Gleyed (S9) (MLRA 147, 148)
- Loamy Gleyed Matrix (F2)
- Depleted Matrix (F3)
- Redox Dark Surface (F6)
- Redox Depressions (F8)
- Iron-Manganese Masses (F12) (LRR N, MLRA 136)
- Umbric Surface (F13) (MLRA 136, 122)
- Piedmont Floodplain Soils (F19) (MLRA 148)
- 2 cm Muck (A10) (MLRA 147)
- Coast Prairie Redox (A16) (MLRA 147, 148)
- Piedmont Floodplain Soils (F19) (MLRA 136, 147)
- Red Parent Material (TF2)
- Very Shallow Dark Surface (TF12)
- Other (Explain in Remarks)

3Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

**Restrictive Layer (if observed):**
- Type: Rock
- Depth (inches): 9"  
  - Hydric Soil Present? ☒ Yes ☐ No

Remarks:
WETLAND DETERMINATION DATA FORM – Eastern Mountains and Piedmont

Project/Site: National Cemetery of the Alleghenies  City/County: Cecil Township /Washington County  Sampling Date: 8/3/2017
Investigator(s): Vince Humenay/Marty Ackley  Section, Township, Range: Cecil Township
Landform (hillslope, terrace, etc.): Depression  Local relief (concave, convex, none): concave  Slope (%): 2
Subregion (LRR or MLRA): LRR N  Lat:  Long:  Datum: 
Soil Map Unit Name: Fluvaquents, loamy  NWI classification: PEM

Are climatic / hydrologic conditions on the site typical for this time of year?  Yes  No (If no, explain in Remarks.)
Are Vegetation, Soil, or Hydrology significantly disturbed?  Are “Normal Circumstances” present?  Yes  No
Are Vegetation, Soil, or Hydrology naturally problematic?  (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

<table>
<thead>
<tr>
<th>Hydrophytic Vegetation Present?</th>
<th>Yes  No</th>
<th>Is the Sampled Area within a Wetland?</th>
<th>Yes  No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydric Soil Present?</td>
<td>Yes  No</td>
<td>Wetland Hydrology Present?</td>
<td>Yes  No</td>
</tr>
</tbody>
</table>

Remarks:
This data plot describes a PEM wetland (Wetland F) located on the southeastern portion of the property. The wetland appears to be fed by seeps originating within the wetland.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)
- Surface Water (A1)
- High Water Table (A2)
- Saturation (A3)
- Water Marks (B1)
- Sediment Deposits (B2)
- Drift Deposits (B3)
- Algal Mat or Crust (B4)
- Iron Deposits (B5)
- Inundation Visible on Aerial Imagery (B7)
- Water-Stained Leaves (B9)
- Aquatic Fauna (B13)

Secondary Indicators (minimum of two required)
- True Aquatic Plants (B14)
- Oxidized Rhizospheres on Living Roots (C3)
- Presence of Reduced Iron (C4)
- Recent Iron Reduction in Tilled Soils (C6)
- Thin Muck Surface (C7)
- Other (Explain in Remarks)
- Surface Soil Cracks (B6)
- Sparsely Vegetated Concave Surface (B8)
- Drainage Patterns (B10)
- Moss Trim Lines (B16)
- Dry-Season Water Table (C2)
- Crayfish Burrows (C8)
- Saturation Visible on Aerial Imagery (C9)
- Stunted or Stressed Plants (D1)
- Geomorphic Position (D2)
- Shallow Aquitard (D3)
- Microtopographic Relief (D4)
- FAC-Neutral Test (D5)

Field Observations:

<table>
<thead>
<tr>
<th>Surface Water Present?</th>
<th>Yes  No</th>
<th>Depth (inches):</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water Table Present?</td>
<td>Yes  No</td>
<td>Depth (inches):</td>
</tr>
<tr>
<td>Saturation Present?</td>
<td>Yes  No</td>
<td>Depth (inches):</td>
</tr>
</tbody>
</table>

Wetland Hydrology Present?  Yes  No
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
VEGETATION (Five Strata) – Use scientific names of plants.

Sampling Point: DP-6

<table>
<thead>
<tr>
<th>Tree Stratum (Plot size: 30')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
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<td>7.</td>
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</tbody>
</table>

\[\text{Total Cover} = \]  

<table>
<thead>
<tr>
<th>Sapling Stratum (Plot size: 15')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
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<td>7.</td>
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</tbody>
</table>

\[\text{Total Cover} = \]  

<table>
<thead>
<tr>
<th>Shrub Stratum (Plot size: 15')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
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<td>7.</td>
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</tbody>
</table>

\[\text{Total Cover} = \]  

<table>
<thead>
<tr>
<th>Herb Stratum (Plot size: 5')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. <em>Typha Latifolia</em></td>
<td>50</td>
<td>Y</td>
<td>OBL</td>
</tr>
<tr>
<td>2. <em>Impatiens capensis</em></td>
<td>10</td>
<td>N</td>
<td>FACW</td>
</tr>
<tr>
<td>3. <em>Dipsacus fullonum</em></td>
<td>20</td>
<td>Y</td>
<td>FACU</td>
</tr>
<tr>
<td>4.</td>
<td></td>
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<td>5.</td>
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<td>7.</td>
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</tbody>
</table>

\[\text{Total Cover} = \]  

<table>
<thead>
<tr>
<th>Woody Vine Stratum (Plot size: )</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
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<tr>
<td>4.</td>
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<tr>
<td>5.</td>
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</tr>
</tbody>
</table>

\[\text{Total Cover} = \]  

Remarks: (Include photo numbers here or on a separate sheet.)

**Definitions of Five Vegetation Strata:**

**Tree** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and 3 in. (7.6 cm) or larger in diameter at breast height (DBH).

**Sapling** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and less than 3 in. (7.6 cm) DBH.

**Shrub** – Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.

**Herb** – All herbaceous (non-woody) plants, including herbaceous vines, regardless of size, and woody plants, except woody vines, less than approximately 3 ft (1 m) in height.

**Woody vine** – All woody vines, regardless of height.

**Hydrophytic Vegetation Present?**  Yes  No

**Dominance Test worksheet:**

- Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)
- Total Number of Dominant Species Across All Strata: 2 (B)
- Percent of Dominant Species That Are OBL, FACW, or FAC: 50 (A/B)

**Prevalence Index worksheet:**

- Total % Cover of: Multiply by:
  - OBL species 50 x 1 = 50
  - FACW species 10 x 2 = 20
  - FAC species _____ x 3 = _____
  - FACU species 20 x 4 = 80
  - UPL species _____ x 5 = _____

- Column Totals: 80 (A) 150 (B)
- Prevalence Index = B/A = 1.88

**Hydrophytic Vegetation Indicators:**

- 1 - Rapid Test for Hydrophytic Vegetation
- 2 - Dominance Test is >50%
- 3 - Prevalence Index is ≤3.0¹
- 4 - Morphological Adaptations¹ (Provide supporting data in Remarks or on a separate sheet)
- Problematic Hydrophytic Vegetation¹ (Explain)

¹Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

<table>
<thead>
<tr>
<th>Depth (inches)</th>
<th>Color (moist)</th>
<th>%</th>
<th>Color (moist)</th>
<th>%</th>
<th>Type</th>
<th>Loc</th>
<th>Texture</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-3</td>
<td>5YR 3/1</td>
<td>100</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Silty</td>
<td></td>
</tr>
<tr>
<td>3-9</td>
<td>5YR 3/1</td>
<td>90</td>
<td>5YR 4/6</td>
<td>10</td>
<td></td>
<td></td>
<td>Clay</td>
<td></td>
</tr>
</tbody>
</table>

1Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains. 2Location: PL=Pore Lining, M=Matrix.

Indicators for Problematic Hydric Soils:

- 2 cm Muck (A10) (MLRA 147)
- Coast Prairie Redox (A16) (MLRA 147, 148)
- Piedmont Floodplain Soils (F19) (MLRA 136, 147)
- Red Parent Material (TF2)
- Very Shallow Dark Surface (TF12)
- Other (Explain in Remarks)

Restrictive Layer (if observed):

Type: Rock

Depth (inches): 9"
**WETLAND DETERMINATION DATA FORM – Eastern Mountains and Piedmont**

**Project/Site:** National Cemetery of the Alleghenies  
**City/County:** Cecil Township / Washington County  
**Applicant/Owner:** William H. Gordon Associates, Inc.  
**State:** PA  
**Sampling Point:** DP-7

**Sampling Date:** 8/3/2017

**Investigator(s):** Vince Humenay/Marty Ackley

**Landform (hillslope, terrace, etc.):** Toe of Slope  
**Local relief (concave, convex, none):** concave  
**Slope (%):** 3

**Subregion (LRR or MLRA):** LRR N

**Soil Map Unit Name:** Fluvaquents, loamy  
**NWI classification:** PEM

**Are climatic / hydrologic conditions on the site typical for this time of year?**  
☐ Yes  ☐ No  
*(If no, explain in Remarks.)*

**Are Vegetation, Soil, or Hydrology significantly disturbed?**  
☐ Yes  ☐ No  
*(If needed, explain any answers in Remarks.)*

**Are Vegetation, Soil, or Hydrology naturally problematic?**  
☐ Yes  ☐ No  
*(If needed, explain any answers in Remarks.)*

### SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

<table>
<thead>
<tr>
<th>Hydrophytic Vegetation Present?</th>
<th>☐ Yes</th>
<th>☐ No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydric Soil Present?</td>
<td>☐ Yes</td>
<td>☐ No</td>
</tr>
<tr>
<td>Wetland Hydrology Present?</td>
<td>☐ Yes</td>
<td>☐ No</td>
</tr>
</tbody>
</table>

**Remarks:**  
This data plot describes a PEM wetland (Wetland G) located on the southeastern portion of the property. The wetland appears to be fed by precipitation and/or seeps originating within the wetland or on the adjoining slope.

### HYDROLOGY

**Primary Hydrology Indicators:**  
- ☑ Surface Water (A1)
- ☑ High Water Table (A2)
- ☑ Saturation (A3)
- ☑ Water Marks (B1)
- ☑ Sediment Deposits (B2)
- ☑ Drift Deposits (B3)
- ☑ Algal Mat or Crust (B4)
- ☑ Iron Deposits (B5)
- ☑ Inundation Visible on Aerial Imagery (B7)
- ☑ Water-Stained Leaves (B9)
- ☑ Aquatic Fauna (B13)

<table>
<thead>
<tr>
<th>Secondary Indicators (minimum of two required):</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑ True Aquatic Plants (B14)</td>
</tr>
<tr>
<td>☑ Hydrogen Sulfide Odor (C1)</td>
</tr>
<tr>
<td>☑ Oxidized Rhizospheres on Living Roots (C3)</td>
</tr>
<tr>
<td>☑ Presence of Reduced Iron (C4)</td>
</tr>
<tr>
<td>☑ Recent Iron Reduction in Tilled Soils (C6)</td>
</tr>
<tr>
<td>☑ Thin Muck Surface (C7)</td>
</tr>
<tr>
<td>☑ Other (Explain in Remarks)</td>
</tr>
<tr>
<td>☑ Surface Soil Cracks (B6)</td>
</tr>
<tr>
<td>☑ Sparsely Vegetated Concave Surface (B8)</td>
</tr>
<tr>
<td>☑ Drainage Patterns (B10)</td>
</tr>
<tr>
<td>☑ Moss Trim Lines (B16)</td>
</tr>
<tr>
<td>☑ Dry-Season Water Table (C2)</td>
</tr>
<tr>
<td>☑ Crayfish Burrows (C8)</td>
</tr>
<tr>
<td>☑ Saturation Visible on Aerial Imagery (C9)</td>
</tr>
<tr>
<td>☑ Stunted or Stressed Plants (D1)</td>
</tr>
<tr>
<td>☑ Geomorphic Position (D2)</td>
</tr>
<tr>
<td>☑ Shallow Aquitard (D3)</td>
</tr>
<tr>
<td>☑ Microtopographic Relief (D4)</td>
</tr>
<tr>
<td>☑ FAC-Neutral Test (D5)</td>
</tr>
</tbody>
</table>

**Field Observations:**

<table>
<thead>
<tr>
<th>Surface Water Present?</th>
<th>☑ Yes</th>
<th>☐ No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Depth (inches): 1&quot;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Water Table Present?</td>
<td>☑ Yes</td>
<td>☐ No</td>
</tr>
<tr>
<td>Depth (inches): surface</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Saturation Present?</td>
<td>☑ Yes</td>
<td>☐ No</td>
</tr>
<tr>
<td>(includes capillary fringe)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Wetland Hydrology Present?**

| ☑ Yes | ☐ No |

**Remarks:**

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available.

**Remarks:**
VEGETATION (Five Strata) – Use scientific names of plants.

Sampling Point: DP-7

<table>
<thead>
<tr>
<th>Tree Stratum (Plot size: 30')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
<th>Dominance Test worksheet:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
<td>Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)</td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td>Total Number of Dominant Species Across All Strata: 1 (B)</td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
<td></td>
<td>Percent of Dominant Species That Are OBL, FACW, or FAC: 100 (A/B)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sapling Stratum (Plot size: 15')</th>
<th>= Total Cover</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Shrub Stratum (Plot size: 15')</th>
<th>= Total Cover</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
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<tr>
<td>5.</td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Herb Stratum (Plot size: 5')</th>
<th>= Total Cover</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. <em>Typha Latifolia</em></td>
<td>70 Y OBL</td>
</tr>
<tr>
<td>2. <em>Scirpus atrovirens</em></td>
<td>10 N OBL</td>
</tr>
<tr>
<td>3. <em>Phytolacca americana</em></td>
<td>10 N FACU</td>
</tr>
<tr>
<td>4. <em>Impatiens capensis</em></td>
<td>5 N FACU</td>
</tr>
<tr>
<td>5. <em>Dipsacus fullonum</em></td>
<td>5 N FACU</td>
</tr>
<tr>
<td>6.</td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td></td>
</tr>
<tr>
<td>8.</td>
<td></td>
</tr>
<tr>
<td>9.</td>
<td></td>
</tr>
<tr>
<td>10.</td>
<td></td>
</tr>
<tr>
<td>11.</td>
<td></td>
</tr>
<tr>
<td>12.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Woody Vine Stratum (Plot size: ____)</th>
<th>= Total Cover</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td></td>
</tr>
</tbody>
</table>

Hydrophytic Vegetation Present? ☐ Yes ☐ No

Prevalence Index worksheet:

| Total % Cover of: Multiply by: |
|-------------------------------|----------------|
| OBL species 80 x 1 = 80       |
| FACW species 5 x 2 = 10       |
| FAC species ____ x 3 = ____    |
| FACU species 15 x 4 = 60      |
| UPL species ____ x 5 = ____    |

Column Totals: 100 (A) 150 (B)

Prevalence Index = B/A = 1.50

Hydrophytic Vegetation Indicators:

- 1 - Rapid Test for Hydrophytic Vegetation
- 2 - Dominance Test is >50%
- 3 - Prevalence Index is ≤3.0
- 4 - Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)
- 5 - Problematic Hydrophytic Vegetation (Explain)

Hydrophytic Vegetation 1

Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Five Vegetation Strata:

- **Tree** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and 3 in. (7.6 cm) or larger in diameter at breast height (DBH).
- **Sapling** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and less than 3 in. (7.6 cm) DBH.
- **Shrub** – Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.
- **Herb** – All herbaceous (non-woody) plants, including herbaceous vines, regardless of size, and woody plants, except woody vines, less than approximately 3 ft (1 m) in height.
- **Woody vine** – All woody vines, regardless of height.

Remarks: (Include photo numbers here or on a separate sheet.)
### Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

<table>
<thead>
<tr>
<th>Depth (inches)</th>
<th>Color (moist)</th>
<th>%</th>
<th>Color (moist)</th>
<th>%</th>
<th>Type¹</th>
<th>Loc²</th>
<th>Texture</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-5</td>
<td>7.5YR 4/1</td>
<td>100</td>
<td></td>
<td></td>
<td></td>
<td>Silty</td>
<td>Clay</td>
<td></td>
</tr>
<tr>
<td>5-11</td>
<td>GLEY 2 4/10B</td>
<td>70</td>
<td>7.5YR 5/6</td>
<td>30</td>
<td></td>
<td>Silty</td>
<td>Clay</td>
<td></td>
</tr>
</tbody>
</table>

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains. ²Location: PL=Pore Lining, M=Matrix.

### Hydric Soil Indicators:

- Histosol (A1)
- Histic Epipedon (A2)
- Black Histic (A3)
- Hydrogen Sulfide (A4)
- Stratified Layers (A5)
- 2 cm Muck (A10) (LRR N)
- Depleted Below Dark Surface (A11)
- Thick Dark Surface (A12)
- Sandy Mucky Mineral (S1) (LRR N, MLRA 147, 148)
- Sandy Gleyed Matrix (S4)
- Sandy Redox (S5)
- Stripped Matrix (S6)

### Indicators for Problematic Hydric Soils³:

- Dark Surface (S7)
- Polyvalue Below Surface (S9) (MLRA 147, 148)
- Thin Dark Surface (S9) (MLRA 147, 148)
- Loamy Gleyed Matrix (F2)
- Depleted Matrix (F3)
- Redox Matrix (F6)
- Depleted Matrix (F7)
- Redox Depressions (F8)
- Iron-Manganese Masses (F12) (LRR N, MLRA 136)
- Umbric Surface (F13) (MLRA 136, 122)
- Redox Depressions (F19) (MLRA 136, 147)
- Red Parent Material (TF2)
- Very Shallow Dark Surface (TF12)
- Other (Explain in Remarks)

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

### Restrictive Layer (if observed):

Type: Rock

- Depth (inches): 11*

- Hydric Soil Present? ☑ Yes  ❌ No

Remarks:
WETLAND DETERMINATION DATA FORM – Eastern Mountains and Piedmont

Project/Site: National Cemetery of the Alleghenies  City/County: Cecil Township/Washington County  Sampling Date: 8/3/2017
Investigator(s): Vince Humenay/Marty Ackley  Section, Township, Range: Cecil Township
Landform (hillslope, terrace, etc.): Swale  Local relief (concave, convex, none): concave  Slope (%): 5
Subregion (LRR or MLRA): LRR N  Lat: _____  Long: _____  Datum: _____
Soil Map Unit Name: Culleoka channery silt loam  NWI classification: PEM/PFO
Are climatic / hydrologic conditions on the site typical for this time of year? ☑ Yes ☐ No (If no, explain in Remarks.)
Are Vegetation ☐, Soil ☐, or Hydrology ☐ significantly disturbed? Are “Normal Circumstances” present? ☑ Yes ☐ No
Are Vegetation ☐, Soil ☐, or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

<table>
<thead>
<tr>
<th>Hydrophytic Vegetation Present?</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydric Soil Present?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Wetland Hydrology Present?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Is the Sampled Area within a Wetland?</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

Remarks:
This data plot describes a PEM/PFO wetland (Wetland H) located on the southeastern portion of the property. The wetland appears to be fed by seeps originating within the wetland and/or on the adjoining slope.

Hydrology

Primary Indicators (minimum of one is required; check all that apply)
- Surface Water (A1)
- High Water Table (A2)
- Saturation (A3)
- Water Marks (B1)
- Sediment Deposits (B2)
- Drift Deposits (B3)
- Algal Mat or Crust (B4)
- Iron Deposits (B5)
- Inundation Visible on Aerial Imagery (B7)
- Water-Stained Leaves (B9)
- Aquatic Fauna (B13)

Secondary Indicators (minimum of two required)
- Surface Soil Cracks (B6)
- Sparsely Vegetated Concave Surface (B8)
- Drainage Patterns (B10)
- Moss Trim Lines (B16)
- Dry-Season Water Table (C2)
- Crayfish Burrows (C8)
- Saturation Visible on Aerial Imagery (C9)
- Stunted or Stressed Plants (D1)
- Geomorphic Position (D2)
- Shallow Aquitard (D3)
- Microtopographic Relief (D4)
- FAC-Neutral Test (D5)

Field Observations:
- Surface Water Present? ☑ Yes ☐ No Depth (inches): ______
- Water Table Present? ☑ Yes ☐ No Depth (inches): ______
- Saturation Present? ☑ Yes ☐ No Depth (inches): surface

Wetland Hydrology Present? ☑ Yes ☐ No

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
**VEGETATION (Five Strata) – Use scientific names of plants.**

<table>
<thead>
<tr>
<th>Tree Stratum (Plot size: 30')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
<th>Dominance Test worksheet:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jugglans nigra (1)</td>
<td>10</td>
<td>Y</td>
<td>FACU</td>
<td>Number of Dominant Species</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>That Are OBL, FACW, or FAC: 1 (A)</td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td>Total Number of Dominant Species Across All Strata: 2 (B)</td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
<td></td>
<td>Percent of Dominant Species</td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td></td>
<td></td>
<td>That Are OBL, FACW, or FAC: 50 (A/B)</td>
</tr>
<tr>
<td>5.</td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td>6.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td>10</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sapling Stratum (Plot size: 15')</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
</tr>
<tr>
<td>2.</td>
</tr>
<tr>
<td>3.</td>
</tr>
<tr>
<td>4.</td>
</tr>
<tr>
<td>5.</td>
</tr>
<tr>
<td>6.</td>
</tr>
<tr>
<td>7.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Shrub Stratum (Plot size: 15')</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
</tr>
<tr>
<td>2.</td>
</tr>
<tr>
<td>3.</td>
</tr>
<tr>
<td>4.</td>
</tr>
<tr>
<td>5.</td>
</tr>
<tr>
<td>6.</td>
</tr>
<tr>
<td>7.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Herb Stratum (Plot size: 5')</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Impatiens capensis (70)</td>
</tr>
<tr>
<td>2. Leersia oryzoides (10)</td>
</tr>
<tr>
<td>3. Dipsacus fullonum (5)</td>
</tr>
<tr>
<td>4.</td>
</tr>
<tr>
<td>5.</td>
</tr>
<tr>
<td>6.</td>
</tr>
<tr>
<td>7.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Woody Vine Stratum (Plot size: ____ )</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
</tr>
<tr>
<td>2.</td>
</tr>
<tr>
<td>3.</td>
</tr>
<tr>
<td>4.</td>
</tr>
<tr>
<td>5.</td>
</tr>
</tbody>
</table>

**Prevalence Index worksheet:**

- Total % Cover of: Multiply by:
  - OBL species: 10 x 1 = 10
  - FACW species: 70 x 2 = 140
  - FAC species: ____ x 3 = ____
  - FACU species: 15 x 4 = 60
  - UPL species: ____ x 5 = ____

- Column Totals: 95 (A) 210 (B)
- Prevalence Index = B/A = 2.21

**Hydrophytic Vegetation Indicators:**

- 1 - Rapid Test for Hydrophytic Vegetation
- 2 - Dominance Test is >50%
- 3 - Prevalence Index ≤ 3.0
- 4 - Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)

**Definitions of Five Vegetation Strata:**

- **Tree** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and 3 in. (7.6 cm) or larger in diameter at breast height (DBH).
- **Sapling** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and less than 3 in. (7.6 cm) DBH.
- **Shrub** – Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.
- **Herb** – All herbaceous (non-woody) plants, including herbaceous vines, regardless of size, and woody plants, except woody vines, less than approximately 3 ft (1 m) in height.
- **Woody vine** – All woody vines, regardless of height.

**Hydrophytic Vegetation Present?** Yes No

Remarks: (Include photo numbers here or on a separate sheet.)
### Soil Profile Description

**Sampling Point:** DP-8

#### Depth Matrix: Redox Features

<table>
<thead>
<tr>
<th>Depth (inches)</th>
<th>Color (moist)</th>
<th>%</th>
<th>Color (moist)</th>
<th>%</th>
<th>Type¹</th>
<th>Loc²</th>
<th>Texture</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-4</td>
<td>10YR 3/2</td>
<td>100</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Silty</td>
<td></td>
</tr>
<tr>
<td>4-11</td>
<td>2.5Y 4/1</td>
<td>65</td>
<td>7.5YR 5/6</td>
<td>35</td>
<td></td>
<td>Clay</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.  
²Location: PL=Pore Lining, M=Matrix.

---

### Hydric Soil Indicators:

- Histosol (A1)
- Histic Epipedon (A2)
- Black Histic (A3)
- Hydrogen Sulfide (A4)
- Stratified Layers (A5)
- 2 cm Muck (A10) (LRR N)
- Depleted Below Dark Surface (A11)
- Thick Dark Surface (A12)
- Sandy Mucky Mineral (S1) (LRR N, MLRA 147, 148)
- Sandy Gleyed Matrix (S4)
- Sandy Redox (S5)
- Stripped Matrix (S6)

### Indicators for Problematic Hydric Soils²:

- 2 cm Muck (A10) (MLRA 147)
- Coast Prairie Redox (A16) (MLRA 147, 148)
- Piedmont Floodplain Soils (F19) (MLRA 136, 147)
- Red Parent Material (TF2)
- Very Shallow Dark Surface (TF12)
- Other (Explain in Remarks)

---

### Restrictive Layer (if observed):

**Type:** Rock  
**Depth (inches):** 11″

**Hydric Soil Present?**  
- Yes □  
- No □

**Remarks:**
WETLAND DETERMINATION DATA FORM – Eastern Mountains and Piedmont

Project/Site: National Cemetery of the Alleghenies  City/County: Cecil Township /Washington County  Sampling Date: 8/3/2017
Investigator(s): Vince Humenay/Marty Ackley  Section, Township, Range: Cecil Township
Landform (hillslope, terrace, etc.): Hillslope  Local relief (concave, convex, none): Convex  Slope (%): 5
Subregion (LRR or MLRA): LRR N  Lat: _____  Long: _____  Datum: _____
Soil Map Unit Name: Culleoka channery silt loam  NWI classification: _____

Are climatic / hydrologic conditions on the site typical for this time of year? ☒ Yes  ☐ No  (If no, explain in Remarks.)
Are Vegetation ☐, Soil ☐, or Hydrology ☐ significantly disturbed?  Are “Normal Circumstances” present? ☒ Yes  ☐ No
Are Vegetation ☐, Soil ☐, or Hydrology ☐ naturally problematic?  (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

<table>
<thead>
<tr>
<th>Hydrophytic Vegetation Present?</th>
<th>☐ Yes  ☒ No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydric Soil Present?</td>
<td>☐ Yes  ☒ No</td>
</tr>
<tr>
<td>Wetland Hydrology Present?</td>
<td>☐ Yes  ☒ No</td>
</tr>
</tbody>
</table>

Remarks:
This data plot describes an upland area to the north of Wetland A.

HYDROLOGY

Primary Hydrology Indicators:
- Surface Water (A1)
- High Water Table (A2)
- Saturation (A3)
- Water Marks (B1)
- Sediment Deposits (B2)
- Drift Deposits (B3)
- Algal Mat or Crust (B4)
- Iron Deposits (B5)
- Inundation Visible on Aerial Imagery (B7)
- Water-Stained Leaves (B9)
- Aquatic Fauna (B13)
- True Aquatic Plants (B14)
- Oxidized Rhizospheres on Living Roots (C3)
- Presence of Reduced Iron (C4)
- Recent Iron Reduction in Tilled Soils (C6)
- Thin Muck Surface (C7)
- Other (Explain in Remarks)
- Geomorphic Position (D2)
- Shallow Aquitard (D3)
- Microtopographic Relief (D4)
- FAC-Neutral Test (D5)

Secondary Indicators (minimum of two required):
- Surface Soil Cracks (B6)
- Sparsely Vegetated Concave Surface (B8)
- Drainage Patterns (B10)
- Moss Trim Lines (B16)
- Dry-Season Water Table (C2)
- Crayfish Burrows (C8)
- Saturation Visible on Aerial Imagery (C9)
- Stunted or Stressed Plants (D1)
- Geomorphic Position (D2)
- Shallow Aquitard (D3)
- Microtopographic Relief (D4)
- FAC-Neutral Test (D5)

Field Observations:
- Surface Water Present? ☐ Yes  ☒ No  Depth (inches): _____
- Water Table Present? ☐ Yes  ☒ No  Depth (inches): _____
- Saturation Present? ☐ Yes  ☒ No  Depth (inches): _____

Wetland Hydrology Present? ☐ Yes  ☒ No

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
# VEGETATION (Five Strata) – Use scientific names of plants.

**Sampling Point: DP-9**

<table>
<thead>
<tr>
<th>Tree Stratum (Plot size: 30')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
<th>Dominance Test worksheet:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
<td>Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)</td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td>Total Number of Dominant Species Across All Strata: 2 (B)</td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
<td></td>
<td>Percent of Dominant Species That Are OBL, FACW, or FAC: 0 (A/B)</td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td></td>
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<tr>
<td>5.</td>
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<tr>
<td>6.</td>
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<table>
<thead>
<tr>
<th>Sapling Stratum (Plot size: 15')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
<th>Dominance Test worksheet:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
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<thead>
<tr>
<th>Shrub Stratum (Plot size: 15')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
<th>Dominance Test worksheet:</th>
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<table>
<thead>
<tr>
<th>Herb Stratum (Plot size: 5')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
<th>Dominance Test worksheet:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Solidago canadensis</td>
<td>25 Y</td>
<td>FACU</td>
<td></td>
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<tr>
<td>2. Securigera varia</td>
<td>10 N</td>
<td>UPL</td>
<td></td>
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<tr>
<td>3. Phytolacca americana</td>
<td>10 N</td>
<td>FACU</td>
<td></td>
<td></td>
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<tr>
<td>4. Dipsacus fullonum</td>
<td>20 Y</td>
<td>FACU</td>
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<table>
<thead>
<tr>
<th>Woody Vine Stratum (Plot size: _____)</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
<th>Dominance Test worksheet:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
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<td>5.</td>
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</table>

**Prevalence Index worksheet:**

- Total % Cover of: Multiply by:
  - OBL species ____ x 1 = 
  - FACW species ____ x 2 = 
  - FAC species ____ x 3 = 
  - FACU species 55 x 4 = 220
  - UPL species 10 x 5 = 50
- Column Totals: 65 (A) 270 (B)
- Prevalence Index = B/A = 4.15

**Hydrophytic Vegetation Indicators:**

- 1 - Rapid Test for Hydrophytic Vegetation
- 2 - Dominance Test is >50%
- 3 - Prevalence Index ≤ 3.0
- 4 - Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)

**Problematic Hydrophytic Vegetation**

- Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

**Definitions of Five Vegetation Strata:**

- **Tree** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and 3 in. (7.6 cm) or larger in diameter at breast height (DBH).
- **Sapling** – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and less than 3 in. (7.6 cm) DBH.
- **Shrub** – Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.
- **Herb** – All herbaceous (non-woody) plants, including herbaceous vines, regardless of size, and woody plants, except woody vines, less than approximately 3 ft (1 m) in height.
- ** Woody vine** – All woody vines, regardless of height.

**Hydrophytic Vegetation Present?** Yes No

Remarks: (Include photo numbers here or on a separate sheet.)
## Profile Description:
(Describe to the depth needed to document the indicator or confirm the absence of indicators.)

<table>
<thead>
<tr>
<th>Depth (inches)</th>
<th>Color (moist)</th>
<th>%</th>
<th>Color (moist)</th>
<th>%</th>
<th>Type</th>
<th>Loc</th>
<th>Texture</th>
<th>Remarks</th>
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<tr>
<td>0-8</td>
<td>7.5YR</td>
<td>100</td>
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</table>

1 Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.

2 Location: PL=Pore Lining, M=Matrix.

### Hydric Soil Indicators:
- Histosol (A1)
- Histic Epipedon (A2)
- Black Histic (A3)
- Hydrogen Sulfide (A4)
- Stratified Layers (A5)
- 2 cm Muck (A10) (LRR N)
- Depleted Below Dark Surface (A11)
- Thick Dark Surface (A12)
- Sandy Mucky Mineral (S1) (LRR N, MLRA 147, 148)
- Sandy Gleyed Matrix (S4)
- Sandy Redox (S5)
- Stripped Matrix (S6)
- Dark Surface (S7)
- Polyvalue Below Surface (S8) (MLRA 147, 148)
- Thin Dark Surface (S9) (MLRA 147, 148)
- Loamy Gleyed Matrix (F2)
- Depleted Matrix (F3)
- Redox Dark Surface (F6)
- Depleted Dark Surface (F7)
- Redox Depressions (F8)
- Iron-Manganese Masses (F12) (LRR N, MLRA 136)
- Umbric Surface (F13) (MLRA 136, 122)
- Piedmont Floodplain Soils (F19)
- Piedmont Floodplain Soils (F19) (MLRA 148)

### Indicators for Problematic Hydric Soils:
- 2 cm Muck (A10) (MLRA 147)
- Coast Prairie Redox (A16)
- Piedmont Floodplain Soils (F19)
- Piedmont Floodplain Soils (F19) (MLRA 136, 147)
- Red Parent Material (TF2)
- Very Shallow Dark Surface (TF12)
- Other (Explain in Remarks)

3 Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

### Restrictive Layer (if observed):
- Type: Rock
- Depth (inches): 8"
WETLAND DETERMINATION DATA FORM – Eastern Mountains and Piedmont

Project/Site: National Cemetery of the Alleghenies  City/County: Cecil Township /Washington County  Sampling Date: 8/3/2017
Investigator(s): Vince Humenay/Marty Ackley  Section, Township, Range: Cecil Township

Landform (hillslope, terrace, etc.): Hillslope  Local relief (concave, convex, none): Convex  Slope (%): 5
Subregion (LRR or MLRA): LRR N  Lat:  Long:  Datum:

Soil Map Unit Name: Culleoka channery silt loam  NWI classification:

Are climatic / hydrologic conditions on the site typical for this time of year?  ☒ Yes  ☐ No  (If no, explain in Remarks.)
Are Vegetation ☐, Soil ☐, or Hydrology ☐ significantly disturbed?  Are “Normal Circumstances” present?  ☐ Yes  ☒ No
Are Vegetation ☐, Soil ☐, or Hydrology ☐ naturally problematic?  (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

<table>
<thead>
<tr>
<th>Hydrophytic Vegetation Present?</th>
<th>☐ Yes  ☒ No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydric Soil Present?</td>
<td>☐ Yes  ☒ No</td>
</tr>
<tr>
<td>Wetland Hydrology Present?</td>
<td>☐ Yes  ☒ No</td>
</tr>
</tbody>
</table>

Remarks:
This data plot describes an upland area to the west of Wetland C.

HYDROLOGY

<table>
<thead>
<tr>
<th>Wetland Hydrology Indicators:</th>
<th>Secondary Indicators (minimum of two required)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Indicators (minimum of one is required; check all that apply)</td>
<td>Surface Soil Cracks (B6)</td>
</tr>
<tr>
<td>☐ Surface Water (A1)</td>
<td>☐ True Aquatic Plants (B14)</td>
</tr>
<tr>
<td>☐ High Water Table (A2)</td>
<td>☐ Hydrogen Sulfide Odor (C1)</td>
</tr>
<tr>
<td>☐ Saturation (A3)</td>
<td>☐ Oxidized Rhizospheres on Living Roots (C3)</td>
</tr>
<tr>
<td>☐ Water Marks (B1)</td>
<td>☐ Presence of Reduced Iron (C4)</td>
</tr>
<tr>
<td>☐ Sediment Deposits (B2)</td>
<td>☐ Recent Iron Reduction in Tilled Soils (C6)</td>
</tr>
<tr>
<td>☐ Drift Deposits (B3)</td>
<td>☐ Thin Muck Surface (C7)</td>
</tr>
<tr>
<td>☐ Algal Mat or Crust (B4)</td>
<td>☐ Other (Explain in Remarks)</td>
</tr>
<tr>
<td>☐ Iron Deposits (B5)</td>
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<tr>
<td>☐ Inundation Visible on Aerial Imagery (B7)</td>
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<tr>
<td>☐ Water-Stained Leaves (B9)</td>
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<tr>
<td>☐ Aquatic Fauna (B13)</td>
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</table>

Field Observations:

| Surface Water Present? |  ☐ Yes  ☒ No  Depth (inches):  |
| Water Table Present?   |  ☐ Yes  ☒ No  Depth (inches):  |
| Saturation Present?    |  ☐ Yes  ☒ No  Depth (inches):  |

Wetland Hydrology Present?  ☐ Yes  ☒ No

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
VEGETATION (Five Strata) – Use scientific names of plants.

<table>
<thead>
<tr>
<th>Tree Stratum (Plot size: 30')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
<th>Dominance Test worksheet:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
<td>Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)</td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td>Total Number of Dominant Species Across All Strata: 1 (B)</td>
</tr>
<tr>
<td>3.</td>
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<td></td>
<td></td>
<td>Percent of Dominant Species That Are OBL, FACW, or FAC: 0 (A/B)</td>
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<td>7.</td>
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<td>= Total Cover</td>
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<tr>
<th>Sapling Stratum (Plot size: 15')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
<th>Prevalence Index worksheet:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
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<td>Total % Cover of: Multiply by:</td>
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<td>2.</td>
<td></td>
<td></td>
<td></td>
<td>OBL species ___ x 1 = ___</td>
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<td>3.</td>
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<td>FACW species 5 x 2 = 10</td>
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<td>FAC species ___ x 3 = ___</td>
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<td>FACU species 50 x 4 = 200</td>
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<td>6.</td>
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<td></td>
<td>UPL species 5 x 5 = 25</td>
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<td>7.</td>
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<td>= Total Cover</td>
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<td>Column Totals: 65 (A) 235 (B)</td>
</tr>
<tr>
<td>Shrub Stratum (Plot size: 15')</td>
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<td></td>
<td>Prevalence Index = B/A = 3.61</td>
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<table>
<thead>
<tr>
<th>Herb Stratum (Plot size: 5')</th>
<th>Absolute % Cover</th>
<th>Dominant Species?</th>
<th>Indicator Status</th>
<th>Hydrophytic Vegetation Indicators:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Solidago canadensis</td>
<td>30</td>
<td>Y</td>
<td>FACU</td>
<td>☐ 1 - Rapid Test for Hydrophytic Vegetation</td>
</tr>
<tr>
<td>2. Daucus carota</td>
<td>5</td>
<td>N</td>
<td>UPL</td>
<td>☐ 2 - Dominance Test is &gt;50%</td>
</tr>
<tr>
<td>3. Phytolacca americana</td>
<td>10</td>
<td>N</td>
<td>FACU</td>
<td>☐ 3 - Prevalence Index ≤ 3.01</td>
</tr>
<tr>
<td>4. Dipsacus fullonum</td>
<td>10</td>
<td>N</td>
<td>FACU</td>
<td>☐ 4 - Morphological Adaptations¹ (Provide supporting data in Remarks or on a separate sheet)</td>
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<tr>
<td>5. Impatiens capensis</td>
<td>5</td>
<td>N</td>
<td>FACW</td>
<td>☐ Problematic Hydrophytic Vegetation¹ (Explain)</td>
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<tr>
<td>Herb Stratum (Plot size: 5')</td>
<td></td>
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<td></td>
<td>Definitions of Five Vegetation Strata:</td>
</tr>
<tr>
<td>Woody Vine Stratum (Plot size: ___)</td>
<td></td>
<td></td>
<td></td>
<td>Tree – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and 3 in. (7.6 cm) or larger in diameter at breast height (DBH).</td>
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<td></td>
<td>Sapling – Woody plants, excluding woody vines, approximately 20 ft (6 m) or more in height and less than 3 in. (7.6 cm) DBH.</td>
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<td>Shrub – Woody plants, excluding woody vines, approximately 3 to 20 ft (1 to 6 m) in height.</td>
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<td>Herb – All herbaceous (non-woody) plants, including herbaceous vines, regardless of size, and woody plants, except woody vines, less than approximately 3 ft (1 m) in height.</td>
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<td>Woody vine – All woody vines, regardless of height.</td>
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<td>Hydrophytic Vegetation Present? ☐Yes ☐No</td>
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</tbody>
</table>

Remarks: (Include photo numbers here or on a separate sheet.)
SOIL

Profile Description: (Describe the depth needed to document the indicator or confirm the absence of indicators.)

<table>
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<tr>
<th>Depth (inches)</th>
<th>Color (moist)</th>
<th>%</th>
<th>Color (moist)</th>
<th>%</th>
<th>Type</th>
<th>Loc</th>
<th>Texture</th>
<th>Remarks</th>
</tr>
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<tbody>
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<td>0-8</td>
<td>7.5YR 3/2</td>
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</table>

1Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.
2Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:
- Histosol (A1)
- Histic Epipedon (A2)
- Black Histic (A3)
- Hydrogen Sulfide (A4)
- Stratified Layers (A5)
- 2 cm Muck (A10) (LRR N)
- Depleted Below Dark Surface (A11)
- Thick Dark Surface (A12)
- Sandy Mucky Mineral (S1) (LRR N, MLRA 147, 148)
- Sandy Gleyed Matrix (S4)
- Sandy Redox (S5)
- Stripped Matrix (S6)

Indicators for Problematic Hydric Soils:
- Dark Surface (S7)
- Polyvalue Below Surface (S8) (MLRA 147, 148)
- Thin Dark Surface (S9) (MLRA 147, 148)
- Loamy Gleyed Matrix (F2)
- Depleted Matrix (F3)
- Redox Dark Surface (F6)
- Depleted Dark Surface (F7)
- Redox Depressions (F8)
- Iron-Manganese Masses (F12) (LRR N, MLRA 136)
- Umbric Surface (F13) (MLRA 136, 122)
- Piedmont Floodplain Soils (F19) (MLRA 148)
- 2 cm Muck (A10) (MLRA 147)
- Coast Prairie Redox (A16)
- Piedmont Floodplain Soils (F19) (MLRA 136, 147)
- Red Parent Material (T2)
- Very Shallow Dark Surface (TF12)
- Other (Explain in Remarks)

Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):
- Type: Rock
- Depth (inches): 8”

Hydric Soil Present?  □ Yes  □ No

Remarks:
Appendix III: Photographic Log
1 - View of Stream A Looking Southeast

2 - View of Stream A and Culvert Beneath Morgan Road
3 - View of Wetland A Looking Northwest

4 - View of Wetland B Looking East
7 - View of Wetland E and F Looking Northwest (Wetland E and F Flank Stream A)

8 - View of Wetland G Looking East
9 - View of Wetland H Looking Northwest

10 - General View Across The Subject Property Looking Northeast
11 - View Across the Subject Property Looking West Into Wetland Areas on the Northern Portion of the Site
Appendix IV: Waters of the U.S. Delineation Map
APPENDIX C

USACE JURISDICTIONAL DETERMINATION
October 16, 2017

Mr. Ronald M. Hestdalen
National Cemetery of the Alleghenies
1158 Morgan Road
Bridgeville, PA 15017

Dear Mr. Hestdalen:

This letter is in response to your request for a preliminary jurisdictional determination (PJD), received on September 18, 2017, prepared by ECS Mid-Atlantic, LLC in a report dated September 1, 2017. A delineation of the National Cemetery of the Alleghenies located at 1193 Morgan Road, Cecil Township, Washington County, PA was verified by Josh Shaffer of this office on October 11, 2017.

You have requested a preliminary jurisdictional determination (PJD) for the proposed 116.2-acre project area. The waters listed below are potentially waters of the United States.

<table>
<thead>
<tr>
<th>Aquatic Resource ID</th>
<th>Lat</th>
<th>Long</th>
<th>Size or length</th>
<th>acres or LF</th>
<th>Resource Type</th>
<th>Geographic Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>WL A</td>
<td>40.311877°</td>
<td>-80.156740°</td>
<td>0.04</td>
<td>ac</td>
<td>PEM</td>
<td>Section 404</td>
</tr>
<tr>
<td>WL B</td>
<td>40.312998°</td>
<td>-80.156666°</td>
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<td>ac</td>
<td>PEM</td>
<td>Section 404</td>
</tr>
<tr>
<td>WL C</td>
<td>40.311906°</td>
<td>-80.156912°</td>
<td>0.09</td>
<td>ac</td>
<td>PEM</td>
<td>Section 404</td>
</tr>
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<td>WL D</td>
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<td>-80.156529°</td>
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<td>ac</td>
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<td>Section 404</td>
</tr>
<tr>
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<td>-80.156490°</td>
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<td>ac</td>
<td>PEM</td>
<td>Section 404</td>
</tr>
<tr>
<td>WL F</td>
<td>40.311403°</td>
<td>-80.156597°</td>
<td>0.004</td>
<td>ac</td>
<td>PEM</td>
<td>Section 404</td>
</tr>
<tr>
<td>WL G</td>
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<td>-80.156011°</td>
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<td>PEM</td>
<td>Section 404</td>
</tr>
<tr>
<td>WL H</td>
<td>40.310542°</td>
<td>-80.157003°</td>
<td>0.19</td>
<td>ac</td>
<td>PEM/PFO</td>
<td>Section 404</td>
</tr>
<tr>
<td>Stream A</td>
<td>40.312226°</td>
<td>-80.157024°</td>
<td>1.520</td>
<td>LF</td>
<td>Perennial</td>
<td>Section 404</td>
</tr>
<tr>
<td>Total Stream</td>
<td></td>
<td></td>
<td>1,520</td>
<td>LF</td>
<td></td>
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<tr>
<td>Total Wetland</td>
<td></td>
<td></td>
<td>1.21</td>
<td>acres</td>
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</tbody>
</table>

The U.S. Army Corps of Engineers authority to regulate waters of the U.S. is based, in part, on the definitions and limits of jurisdiction contained in 33 CFR 328 and 33 CFR 329. Section 404...
of the Clean Water Act (CWA) requires that a Department of the Army (DA) permit be obtained prior to the discharge of dredged or fill material into waters of the U.S., including wetlands.

Based on a review of the information provided, eight (8) wetlands totaling 1.21 acres and 1 stream totaling 1,520 linear feet are located within the proposed review area. The hydrology of these aquatic resources flow into McPherson Run and eventually to the Ohio River (TNW) a section 10 Traditional Navigable Waterway. This office has determined that these waters may be jurisdictional waters of the United States in accordance with the Regulatory Guidance Letter for Jurisdictional Determinations issued by the U.S. Army Corps of Engineers in October 2016 (RGL No. 16-01). As indicated in the guidance, this PJD is non-binding and cannot be appealed (33 C.F.R. 331.2) and only provides a written indication that waters of the U.S., including wetlands, may be present on-site.

At this time you have requested a Preliminary Jurisdictional Determination with an option to request an approved JD later. However, for the purposes of the determination of impacts, compensatory mitigation, and other resource protection measures for activities that require authorization from this office, the streams and wetlands identified above will be evaluated as if they are jurisdictional waters of the United States.

If you have any questions, please contact Josh Shaffer at (412) 395-7121 or email Joshua.d.shaffer@usace.army.mil and reference project No. LRP-2017-1438 in all future correspondence with this office regarding this delineation.

Sincerely,

[Signature]

Jon T. Coleman
Acting Chief
Regulatory Branch

Enclosure

Copies Furnished:
- Joe Snyder (PA DEP)
✓ Vince Humenay (ECS Mid-Atlantic)
- Jason Gerhard (William H. Gordon Associates, Inc.)
Appendix 2 - PRELIMINARY JURISDICTIONAL DETERMINATION (PJD) FORM

BACKGROUND INFORMATION

A. REPORT COMPLETION DATE FOR PJD: September 1, 2017

B. NAME AND ADDRESS OF PERSON REQUESTING PJD:

C. DISTRICT OFFICE, FILE NAME, AND NUMBER: LRP-2017-1438

D. PROJECT LOCATION(S) AND BACKGROUND INFORMATION:
   (USE THE TABLE BELOW TO DOCUMENT MULTIPLE AQUATIC RESOURCES AND/OR AQUATIC RESOURCES AT DIFFERENT SITES)

   State: PA  County/parish/borough: Washington  City: Cecil Township
   Center coordinates of site (lat/long in degree decimal format):
   Lat.: 40.31262  Long.: -80.15968
   Universal Transverse Mercator:
   Name of nearest waterbody: McPherson Run

E. REVIEW PERFORMED FOR SITE EVALUATION (CHECK ALL THAT APPLY):
   - Office (Desk) Determination. Date: 9-18-2017
   - Field Determination. Date(s): 10-11-2017

   TABLE OF AQUATIC RESOURCES IN REVIEW AREA WHICH "MAY BE" SUBJECT TO REGULATORY JURISDICTION.

<table>
<thead>
<tr>
<th>Site number</th>
<th>Latitude (decimal degrees)</th>
<th>Longitude (decimal degrees)</th>
<th>Estimated amount of aquatic resource in review area (acreage and linear feet, if applicable)</th>
<th>Type of aquatic resource (i.e., wetland vs. non-wetland waters)</th>
<th>Geographic authority to which the aquatic resource &quot;may be&quot; subject (i.e., Section 404 or Section 10/404)</th>
</tr>
</thead>
<tbody>
<tr>
<td>see</td>
<td>table</td>
<td>within</td>
<td>PJD</td>
<td>Letter</td>
<td></td>
</tr>
</tbody>
</table>
1) The Corps of Engineers believes that there may be jurisdictional aquatic resources in the review area, and the requestor of this PJD is hereby advised of his or her option to request and obtain an approved JD (AJD) for that review area based on an informed decision after having discussed the various types of JDs and their characteristics and circumstances when they may be appropriate.

2) In any circumstance where a permit applicant obtains an individual permit, or a Nationwide General Permit (NWP) or other general permit verification requiring “pre-construction notification” (PCN), or requests verification for a non-reporting NWP or other general permit, and the permit applicant has not requested an AJD for the activity, the permit applicant is hereby made aware that: (1) the permit applicant has elected to seek a permit authorization based on a PJD, which does not make an official determination of jurisdictional aquatic resources; (2) the applicant has the option to request an AJD before accepting the terms and conditions of the permit authorization, and that basing a permit authorization on an AJD could possibly result in less compensatory mitigation being required or different special conditions; (3) the applicant has the right to request an individual permit rather than accepting the terms and conditions of the NWP or other general permit authorization; (4) the applicant can accept a permit authorization and thereby agree to comply with all the terms and conditions of that permit, including whatever mitigation requirements the Corps has determined to be necessary; (5) undertaking any activity in reliance upon the subject permit authorization without requesting an AJD constitutes the applicant’s acceptance of the use of the PJD; (6) accepting a permit authorization (e.g., signing a proffered individual permit) or undertaking any activity in reliance on any form of Corps permit authorization based on a PJD constitutes agreement that all aquatic resources in the review area affected in any way by that activity will be treated as jurisdictional, and waives any challenge to such jurisdiction in any administrative or judicial compliance or enforcement action, or in any administrative appeal or in any Federal court; and (7) whether the applicant elects to use either an AJD or a PJD, the JD will be processed as soon as practicable. Further, an AJD, a proffered individual permit (and all terms and conditions contained therein), or individual permit denial can be administratively appealed pursuant to 33 C.F.R. Part 331. If, during an administrative appeal, it becomes appropriate to make an official determination whether geographic jurisdiction exists over aquatic resources in the review area, or to provide an official delineation of jurisdictional aquatic resources in the review area, the Corps will provide an AJD to accomplish that result, as soon as is practicable. This PJD finds that there "may be" waters of the U.S. and/or that there "may be" navigable waters of the U.S. on the subject review area, and identifies all aquatic features in the review area that could be affected by the proposed activity, based on the following information:
SUPPORTING DATA. Data reviewed for PJD (check all that apply)

Checked items should be included in subject file. Appropriately reference sources below where indicated for all checked items:

- Maps, plans, plots or plat submitted by or on behalf of the PJD requestor:
  - Map: Aquatic Resource map in Sept. 1, 2017 report

- Data sheets prepared/submitted by or on behalf of the PJD requestor.
  - Office concur with data sheets/delineation report.
  - Office does not concur with data sheets/delineation report. Rationale: _______________

- Data sheets prepared by the Corps: ________________________________

- Corps navigable waters' study: ________________________________

- U.S. Geological Survey Hydrologic Atlas:
  - USGS NHD data.
  - USGS 8 and 12 digit HUC maps.

- U.S. Geological Survey map(s). Cite scale & quad name: Canonsburg

- Natural Resources Conservation Service Soil Survey. Citation: ________________________________

- National wetlands inventory map(s). Cite name: ________________________________

- State/local wetland inventory map(s): ________________________________

- FEMA/FIRM maps: ________________________________

- 100-year Floodplain Elevation is: ________________________________ (National Geodetic Vertical Datum of 1929)

- Photographs: Aerial (Name & Date): google earth
  or Other (Name & Date): Sept. 1, 2017 report

- Previous determination(s). File no. and date of response letter: ________________________________

- Other information (please specify): ________________________________

IMPORTANT NOTE: The information recorded on this form has not necessarily been verified by the Corps and should not be relied upon for later jurisdictional determinations.

SHAFFER, JOSHUA DAVI
D. 12/4/2016

Signature and date of Regulatory staff member completing PJD

Signature and date of person requesting PJD
(REQUIRED, unless obtaining the signature is impracticable)

1 Districts may establish timeframes for requestor to return signed PJD forms. If the requestor does not respond within the established timeframe, the district may presume concurrence and no additional follow up is necessary prior to finalizing an action.
<table>
<thead>
<tr>
<th>Aquatic Resource ID</th>
<th>Lat (°)</th>
<th>Long (°)</th>
<th>Size or length</th>
<th>acres or LF</th>
<th>Resource Type</th>
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<td>Section 404</td>
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<td><strong>Total Stream</strong></td>
<td></td>
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<td>1.520</td>
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<td>1.21</td>
<td>acres</td>
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APPENDIX D
PNHP PENNSYLVANIA NATURAL DIVERSITY INVENTORY RECEIPT
1. PROJECT INFORMATION

Project Name: National Cemetary of the Alleghenies Expansion
Date of Review: 4/5/2018 04:12:15 PM
Project Category: Development, New public/community development (school, library, church, museum)
Project Area: 155.93 acres
County(s): Washington
Township/Municipality(s): CECIL
ZIP Code: 15017; 15317
Quadrangle Name(s): CANONSBURG
Watersheds HUC 8: Upper Ohio
Watersheds HUC 12: Middle Chartiers Creek
Decimal Degrees: 40.314211, -80.156992
Degrees Minutes Seconds: 40° 18' 51.1602" N, 80° 9' 25.1702" W

2. SEARCH RESULTS

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<th>Agency</th>
<th>Results</th>
<th>Response</th>
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</thead>
<tbody>
<tr>
<td>PA Game Commission</td>
<td>Conservation Measure</td>
<td>No Further Review Required, See Agency Comments</td>
</tr>
<tr>
<td>PA Department of Conservation and Natural Resources</td>
<td>No Known Impact</td>
<td>No Further Review Required</td>
</tr>
<tr>
<td>PA Fish and Boat Commission</td>
<td>No Known Impact</td>
<td>No Further Review Required</td>
</tr>
<tr>
<td>U.S. Fish and Wildlife Service</td>
<td>Avoidance Measure</td>
<td>See Agency Response</td>
</tr>
</tbody>
</table>

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate there may be potential impacts to threatened and endangered and/or special concern species and resources within the project area. If the response above indicates "No Further Review Required" no additional communication with the respective agency is required. If the response is "Further Review Required" or "See Agency Response," refer to the appropriate agency comments below. Please see the DEP Information Section of this receipt if a PA Department of Environmental Protection Permit is required.
RESPONSE TO QUESTION(S) ASKED

Q1: The proposed project is in the range of the Indiana bat. Describe how the project will affect bat habitat (forests, woodlots and trees) and indicate what measures will be taken in consideration of this. Round acreages up to the nearest acre (e.g., 0.2 acres = 1 acre).

Your answer is: The project will affect 1 to 39 acres of forests, woodlots and trees.

Q2: Is tree removal, tree cutting or forest clearing necessary to implement all aspects of this project?

Your answer is: Yes

Q3: Is tree removal, tree cutting or forest clearing of 40 acres or more necessary to implement all aspects of this project?

Your answer is: No

Q4: Will any tree removal be necessary to carry out any part of this project or activity? “Tree removal” is defined as cutting down, harvesting, destroying, trimming, or manipulating trees, saplings, or snags. [Round acres of tree removal up to the nearest acre (e.g., 1.2 acre becomes 2 acres).]

Your answer is: 2 to 10 acres of tree removal will occur.

3. AGENCY COMMENTS
Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are valid for two years (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt. The jurisdictional agencies strongly advise against conducting surveys for the species listed on the receipt prior to consultation with the agencies.

PA Game Commission
RESPONSE:
Conservation Measure: Potential impacts to state and federally listed species which are under the jurisdiction of both the Pennsylvania Game Commission (PGC) and the U.S. Fish and Wildlife Service may occur as a result of this project. As a result, the PGC defers comments on potential impacts to federally listed species to the U.S. Fish and Wildlife Service. No further coordination with the Pennsylvania Game Commission is required at this time.

PGC Species: (Note: The Pennsylvania Conservation Explorer tool is a primary screening tool, and a desktop review may reveal more or fewer species than what is listed below.)

<table>
<thead>
<tr>
<th>Scientific Name</th>
<th>Common Name</th>
<th>Current Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sensitive Species**</td>
<td></td>
<td>Special Concern Species*</td>
</tr>
</tbody>
</table>

PA Department of Conservation and Natural Resources
RESPONSE:
No Impact is anticipated to threatened and endangered species and/or special concern species and resources.
PA Fish and Boat Commission
RESPONSE:
No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

U.S. Fish and Wildlife Service
RESPONSE:
Avoidance Measure: The proposed project is in the vicinity of a northern long-eared bat maternity roost(s). To avoid prohibited incidental take of northern long-eared bats during the pup season, do not conduct any tree removal from June 1 to July 31. Tree removal is defined as cutting down, harvesting, destroying, trimming, or manipulating trees, saplings, or snags. This seasonal restriction on tree removal is not required when removing hazardous trees for the protection of human life and property, as incidental take resulting from hazardous tree removal is exempted by the U.S. Fish and Wildlife Service's 4(d) rule (https://www.fws.gov/midwest/endangered/mammals/nlba).

As the project proponent or applicant, I certify that I will implement the above Avoidance Measure:
___________________________(Signature)

SPECIAL NOTE: If you agree to implement the above Avoidance Measure, no further coordination with this agency regarding threatened and endangered species and/or special concern species and resources is required. If you are not able to comply with the Avoidance Measures, you are required to coordinate with this agency - please send project information to this agency for review (see "What to Send" section).

* Special Concern Species or Resource - Plant or animal species classified as rare, tentatively undetermined or candidate as well as other taxa of conservation concern, significant natural communities, special concern populations (plants or animals) and unique geologic features.

** Sensitive Species - Species identified by the jurisdictional agency as collectible, having economic value, or being susceptible to decline as a result of visitation.

WHAT TO SEND TO JURISDICTIONAL AGENCIES

If project information was requested by one or more of the agencies above, upload* or email* the following information to the agency(s). Instructions for uploading project materials can be found here. This option provides the applicant with the convenience of sending project materials to a single location accessible to all three state agencies. Alternatively, applicants may email or mail their project materials (see AGENCY CONTACT INFORMATION).

*Note: U.S. Fish and Wildlife Service requires applicants to mail project materials to the USFWS PA field office (see AGENCY CONTACT INFORMATION). USFWS will not accept project materials submitted electronically (by upload or email).

Check-list of Minimum Materials to be submitted:
_____Project narrative with a description of the overall project, the work to be performed, current physical characteristics of the site and acreage to be impacted.
_____A map with the project boundary and/or a basic site plan(particularly showing the relationship of the project to the physical features such as wetlands, streams, ponds, rock outcrops, etc.)
In addition to the materials listed above, USFWS REQUIRES the following
_____SIGNED copy of a Final Project Environmental Review Receipt

The inclusion of the following information may expedite the review process.
_____Color photos keyed to the basic site plan (i.e. showing on the site plan where and in what direction each photo was taken and the date of the photos)
_____Information about the presence and location of wetlands in the project area, and how this was determined (e.g., by a qualified wetlands biologist), if wetlands are present in the project area, provide project plans showing the location of all project features, as well as wetlands and streams.
4. DEP INFORMATION

The Pa Department of Environmental Protection (DEP) requires that a signed copy of this receipt, along with any required documentation from jurisdictional agencies concerning resolution of potential impacts, be submitted with applications for permits requiring PNDI review. Two review options are available to permit applicants for handling PNDI coordination in conjunction with DEP’s permit review process involving either T&E Species or species of special concern. Under sequential review, the permit applicant performs a PNDI screening and completes all coordination with the appropriate jurisdictional agencies prior to submitting the permit application. The applicant will include with its application, both a PNDI receipt and/or a clearance letter from the jurisdictional agency if the PNDI Receipt shows a Potential Impact to a species or the applicant chooses to obtain letters directly from the jurisdictional agencies. Under concurrent review, DEP, where feasible, will allow technical review of the permit to occur concurrently with the T&E species consultation with the jurisdictional agency. The applicant must still supply a copy of the PNDI Receipt with its permit application. The PNDI Receipt should also be submitted to the appropriate agency according to directions on the PNDI Receipt. The applicant and the jurisdictional agency will work together to resolve the potential impact(s). See the DEP PNDI policy at https://conservationexplorer.dcnr.pa.gov/content/resources.
5. ADDITIONAL INFORMATION

The PNDI environmental review website is a preliminary screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page (www.naturalheritage.state.pa.us). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.

6. AGENCY CONTACT INFORMATION

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<td>Bureau of Forestry, Ecological Services Section</td>
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<td>400 Market Street, PO Box 8552</td>
<td>Endangered Species Section</td>
</tr>
<tr>
<td>Harrisburg, PA 17105-8552</td>
<td>110 Radnor Rd; Suite 101</td>
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<tr>
<td>Email: <a href="mailto:RA-HeritageReview@pa.gov">RA-HeritageReview@pa.gov</a></td>
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<tr>
<td>595 E. Rolling Ridge Dr., Bellefonte, PA 16823</td>
<td>Division of Environmental Planning and Habitat</td>
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<tr>
<td>Email: <a href="mailto:RA-FBPACENOTIFY@pa.gov">RA-FBPACENOTIFY@pa.gov</a></td>
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7. PROJECT CONTACT INFORMATION

Name: ________________________________________________________
Company/Business Name: ____________________________________________
Address: _______________________________________________________ 
City, State, Zip: ________________________________________________
Phone: (_____)_________________________ Fax: (______)___________________
Email: _______________________________________________________

8. CERTIFICATION

I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions that were asked during this online review change, I agree to re-do the online environmental review.

__________________________________________________________ date
Appendix B – Regulatory Communications
November 21, 2018

Glenn Elliott
Environmental Officer
U.S. Department of Veterans Affairs
Construction & Facilities Management Office
Washington DC


Dear Mr. Elliott:

Thank you for providing information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project’s potential effects on both historic and archaeological resources. Our comments are as follows:

Archaeological Resources
The archaeological resources listed below are located in or near the project area. In our opinion, the activity described in your proposal will have no adverse effect on such resources. Should the scope of the project be amended to include additional ground disturbing activity, the PA SHPO should be contacted.

36WH0153

Above Ground Resources
The properties listed below, listed in or eligible for the National Register of Historic Places, are located near the project area. In our opinion, the activity described in your proposal will have no adverse effect on such resources. Should the scope and/or nature of the project activities change, the PA SHPO should be contacted.

National Cemetery of the Alleghenies (Key No. 201771)

If you need further information regarding archaeological resources, please contact Douglas McLearen at dmclearen@pa.gov or (717) 772-0925. If you need further information concerning above ground resources, please contact Barbara Frederick at bafrederic@pa.gov or (717) 772-0921.

Sincerely,

Douglas C. McLearen, Chief
Division of Archaeology and Protection
October 11, 2018

Ms. Serena Bellew, Bureau Director/Deputy SHPO
Commonwealth Keystone Building
Second Floor
400 North Street
Harrisburg, PA 17120-0093

Subject: Section 106 Coordination for the National Cemetery of the Alleghenies Proposed Expansion
Cecil Township, Washington County, Pennsylvania
ER#2001-2888-125-E, ER#89-1378-042-S and ER #89-1378-042-W

Dear Ms. Bellew:

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) has prepared a Draft Site-Specific Environmental Assessment (SEA) to assess the potential for environmental impacts associated with a Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania, 15017.

Under the Proposed Action, the VA would construct and operate the Phase 3 cemetery expansion within the northern portion of the existing cemetery. The Phase 3 expansion would include approximately 13,500 new burial areas, providing burial capacity for the next 10 years. Additionally, the 2018 Master Plan provides the design basis for potential future cemetery expansion phases within an approximately 80-acre area in what is the currently undeveloped southern portion of the property. These potential future expansion phases would provide approximately 51,000 new burial sites, extending the longevity of the NCOTA for several decades. The layouts for the proposed expansion phases described in the 2018 Master Plan are depicted in Figure 1. Following completion of the Phase 3 expansion, the VA would evaluate the need to implement potential future expansion phases in the southern portion of the property approximately every 8-10 years, and separate NEPA assessments would be performed prior to implementing each phase.

In addition to providing new casket, columbarium, and in-ground cremation burial sites, the Proposed Action would provide physical infrastructure improvements including new roadways to connect existing and new burial areas; new stormwater management features; extension of the irrigation utility; and landscaping at the new burial areas. Under the Proposed Action, no new property would be purchased and the current boundary of the NCOTA would remain unchanged.

Although the NCOTA is not 50 years of age, the Advisory Council on Historic Preservation (ACHP) in 2011 determined that all developed sections of all national cemeteries are eligible for listing in the National Register of Historic Places (NRHP) regardless of age. This means that all undertakings or projects at national cemeteries must be reviewed by the State Historic Preservation Officer (SHPO) per Section 106, National Historic Preservation Act of 1966, prior to NCA awarding contracts or initiating work. In addition, unimproved portions of a national cemetery that have only been set aside for future use, and not ready to receive burials, are not eligible for the NRHP.

Accordingly, the VA has researched available information and performed investigations to assess whether the Proposed Action would have an adverse impact on historic or archaeological resources within the Area of Potential Effect (APE), which has previously been defined as the entire NCOTA property boundary and
Section 106 Coordination for the National Cemetery of the Alleghenies Proposed Expansion

is therefore inclusive of the proposed Phase 3 expansion area in the northern portion of the property and the potential future expansions areas in the southern portion of the property. A figure of the APE is provided in Attachment A. A summary of the research findings is presented in the following paragraphs, with relevant excerpts provided as attachments to this letter.

A 2003 Phase I Cultural Resources Survey and a 2004 Phase I Archaeological Survey have been previously conducted for the entire NCOTA property, inclusive of the Proposed Action expansion areas. All work was performed pursuant to the NHPA and the ACHP’s “Protection of Historic Properties” (36 CFR Part 800). This work was also conducted pursuant to the PHMC, Bureau of Historic Preservation (BHP) Guidelines for Archaeological Investigations (1991), and the Pennsylvania History Code (37 Pa. C.S.A. Section 101 et seq.).

The 2003 Phase I investigation consisted of an examination of all documents for the project tract and adjacent areas on file at the Pennsylvania Historical and Museum Commission’s (PHMC) SHPO and the Carnegie Museum of Natural History. The Phase I investigation methodology included surface surveillance, ground penetrating radar (GPR), surface collection, and the excavation of shovel test pits. Background research conducted in association with the Phase I investigation revealed two historic properties that are over 50 years old: the William D. Morgan Farmstead and the Robert L. Morgan Farmstead (both determined not eligible for the NRHP); and two previously recorded archaeological sites: the Morgan Site [36WH417], a prehistoric archaeological site of unknown cultural affiliation, and the Tombstone Site [36WH153], a small, 1782 historic family cemetery with a prehistoric component.

The field survey for the 2003 Phase I investigation identified six cultural resources: the two previously recorded historic farmsteads, the two previously recorded archaeological sites (36WH153; 36WH417), and two newly identified prehistoric archaeological sites (36WH1371; 36WH1372). It was recommended that the Tombstone Site (36WH153) be excluded from all future ground disturbing activities; subsequently, this was acknowledged and agreed upon by the PHMC/BHP in a letter dated December 16, 2003. An excerpt from the Phase I report and a copy of the PHMC/BHP letter are included in Attachment A.

The 2004 Phase I Archaeological Survey was conducted to evaluate the NRHP eligibility for these sites. Based on the Phase I Archaeological Survey results, the Morgan Site (36WH417), Morgan #2 Site (36WH1371) and Morgan #3 Site (36WH1372), the PHMC/BHP concurred in a letter dated October 13, 2004, that the three sites were not eligible for listing on the NRHP, and that no further archaeological work was necessary. An excerpt from the 2004 Phase 1 Archaeological Survey report and a copy of the PHMC/BHP letter are provided in Attachment B.

Based on these prior investigation findings and the concurrence from the PHMC/BHP, as well as the VA’s commitment to establish a 75-foot setback around the Tombstone Site (highlighted on Figure 1), the VA’s determination is that the proposed undertaking (implementing the Proposed Action) should have No Adverse Effect on historic or archaeological resources within the APE. Additionally, the Proposed Action incorporates an inadvertent discovery plan, whereby the VA would cease all activities involving subsurface disturbance should any prehistoric or historic artifacts that could be associated with Native American, early European, or American settlement be encountered at any time within the expansion areas. Additionally, should human remains or other cultural items (as defined by the Native American Graves Protection and Repatriation Act) be discovered during project construction, the construction contractor would immediately cease work until the contact is made with the VA, a qualified archaeologist, the SHPO, and the Delaware Tribe of Indians (who asked to be notified during consultation of a proposed expansion phase in 2015), to properly identify and appropriately treat discovered items in accordance with applicable state and federal law(s).

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1 Both farm complexes were part of a Historic Resources Survey and Determination of Eligibility Report in 1999 as part of the Southern Beltway Transportation Project. The BHP PHMC determined that they were not eligible for listing in the NRHP because they lacked integrity (ER #89-1278-042-S and ER #89-1378-042-W).
In summary, the VA had determined that this undertaking should have No Adverse Effect on historic properties, and we ask your office to concur or not concur with this finding. Please review this request and provide comments or a request for additional information within 30 days of receipt of this letter.

If you need additional information, please contact me via email at glenn.elliott@va.gov, by telephone at (202) 632-5879, or by mail at Glen Elliott, Construction and Facilities Management Office, 425 “i” Street NW, Washington, D.C. 20001.

Respectfully,

Glenn Elliott, Senior PP/M
Environmental Officer
U.S. Department of Veterans Affairs
Construction & Facilities Management Office

Enclosures:

Figure 1 – NCOTA Proposed Action Expansion Areas
Attachment A – Excerpt from the 2003 Phase I Cultural Resources Survey and Consultation Letter
Attachment B – Excerpt from the 2004 Phase I Archaeological Survey and Consultation Letter
Section 106 Coordination for the National Cemetery of the Alleghenies Proposed Expansion

Figure 1. National Cemetery of the Alleghenies - Proposed Action Expansion Areas
Attachment A

Excerpt from the 2003 Phase I Cultural Resources Survey and Consultation Letter
Figure 2
Area of Potential Effect
Canonsburg, PA USGS 7.5" Quad Map
1 inch = 2000 feet
A Phase IA cultural resources survey of the proposed Pittsburgh National Cemetery site, Washington County, Pennsylvania was conducted in support of an Environmental Assessment. This work is necessitated by the proposed construction of a cemetery located approximately 15 miles south of Pittsburgh. The site straddles I-79 on a 275-acre tract owned by the Morgan family. The goals of the survey was to: 1) determine the presence or absence of previously identified archaeological or historic architectural resources in the project’s area of potential effect (APE); 2) identify in preliminary fashion the presence of any historic architectural resources within the APE potentially eligible for inclusion in the National Register of Historic Places (NRHP); and 3) establish the potential of the project APE to contain archaeological sites not previously identified. The investigation consisted of a pedestrian survey of the property, an examination of all site files, maps and previous cultural resource investigation reports for the project tract and adjacent areas at the Pennsylvania Historical and Museum Commission (PHMC) and the Carnegie Museum of Natural History (CMNH). In addition, a review was conducted of all relevant historical sources (i.e., maps, atlases, county and local histories, etc.) at various local repositories. All work was performed pursuant to the National Historic Preservation Act of 1966, as amended; and the Advisory Council on Historic Preservation’s “Protection of Historic Properties” (36 CFR 800). This work was also conducted pursuant to the PHMC, Bureau of Historic Preservation (BHP) Guidelines for Archaeological Investigations (1991), and the Pennsylvania History Code (37 Pa. C.S.A. Section 101 et seq.).

Archaeological Resources

The preliminary APE is located in the unglaciated Allegheny Plateau Section of the Appalachian Plateaus Province (Fenneman). Low to moderate relief and narrow and shallow valleys characterize the topography of this province. These features were formed primarily by fluvial erosion and are prevalent within the project tract.

A number of known archaeological sites, mostly prehistoric, on file with the PHMC and CMNH have been identified in the vicinity of and within the project’s APE. The National Park Service (NPS) identified several sites in Cecil Township during a survey conducted in the late 1960’s. Two of the identified sites are within close proximity to the APE. The first, the Cabana Beach Site (18WH154), was identified as a sparse scatter of material of unknown age (Pennsylvania Archaeological Site Survey [PASS] Form 154). The second, the Stynkas Site (18WH997), is situated southeast of the southern boundary of the APE and consisted of a campsite with Archaic and Woodland components (PASS Form 997).

There are two known sites within the APE, both of which are situated on William Morgan’s farm located on the south side of Morgan Road. The National Park Service identified the Tombstone Site (18WH153), in 1967. This site, a 1782 family cemetery, is situated roughly 250 feet south of Morgan Road in the northwest corner of William Morgan’s farm on a gently sloping hillside. The family burial plot contains the remains of the Fawcett (Faucett), Boyce, and Hickman families. There are four granite corner posts installed circa 1906, three of which list the names of a small portion of the deceased. The fourth post mentions that there are a total of 32 persons...
buried in the plot. According to William D. Morgan, the Boyces, Fawcetts, and Hickmans were interrelated through marriage. Research indicates that the Fawcetts were Quakers who emigrated to Springfield Township, Chester County, Pennsylvania from Ireland circa 1736. Historic records and maps showed that prior to the mid-nineteenth century, the name was periodically spelled Faucett, Fausett, Facitt and Fosett. Prehistoric lithic debitage and one projectile point were found by the NPS in the vicinity of this site during their survey (PASS Form 153).

The second site, known as the Morgan Site (18WH417), is actually two dark soil-stains about 350 yards apart. It appears that these stains fall just on the edge of the APE, but may extend partially beyond its boundary. Identified in 1975, the site is situated on a hill overlooking William Morgan’s house. Prehistoric artifacts, including fire cracked rock, a hammerstone and flint debitage have been found in association with the site (PASS Form 417).

Existing Conditions

Following the examination of site files at the Pennsylvania Historical and Museum Commission and the Carnegie Museum of Natural History a pedestrian survey was conducted of the APE on March 27, 2001 and involved an examination of exposed ground surfaces. Particular attention was paid to topography, areas of disturbance and location of water sources, as these criteria generally determine the potential for an area to contain archaeological sites. The Robert L. Morgan Farm located north of Morgan Road is generally hilly, with two prominent high spots along the eastern edge of the APE. These high spots are generally level on top and may have offered a favorable location for prehistoric peoples to temporarily settle. From here the land slopes eastward toward I-79. A drainage ditch exists at the northern edge of the APE and a small creek, which crosses under I-79, can be found in the northeastern corner. A pond, situated in the lowest point on the property, connects with a spring head and spring-house in the middle of the property. Alfalfa crops and remnants of corn crops are the typical ground coverage on the property. At the time of this field visit surface visibility was good to moderate. No historic or prehistoric artifacts were observed and no above surface features were identified.

The topography on the William D. Morgan farm, located south of Morgan Road, can be described as gentle rolling hills, not quite as pronounced as the landscape to the north. In general, the area is open with good to moderate visibility with the exception of some wooded areas in the southern portion of the APE. An attempt was made to locate site 18WH417, described as two dark surface stains, during the field visit. The location was roughly established although nothing could be identified on the surface, indicating that a more precise understanding of this site’s boundaries is necessary. The integrity and significance of the site is unknown and needs to be established. Site 18WH153, the late eighteenth century cemetery in the northeastern portion of the property, contains 32 burials. Prehistoric artifacts found in the vicinity of the cemetery by the NPS in 1967 indicate the potential for this area to contain more archaeological resources. No prehistoric or historic artifacts were found during this field visit and no features aside from the cemetery monuments were identified. Mr. William Morgan recalled having found projectile points on his farm over the years, but did not record their locations. He added that his neighbor to the west has collected a jar full of them.
Portions of the APE immediately to the east and west of I-79 and running parallel to it consist of disturbed land associated with the construction of this road. These areas have a low potential for yielding intact archaeological deposits.

**Historic Structures**

The APE encompasses two farms belonging to the Morgan Family. Robert L. Morgan owns the farm north of Morgan Road while his brother William D. Morgan owns the farm to the south. The land was originally held by the Fawcett and later the McPherson families during the eighteenth and nineteenth centuries. Historically, the farms have been part of one large tract. In addition, during the late eighteenth and early nineteenth centuries, small portions of other neighboring tracts were purchased by the original owner and incorporated into the main farm.

*William D. Morgan Farm (South Farm)*

The William D. Morgan Farm is comprised of portions of the original eighteenth century “Crossroads” Plantation and the “Farmington” Plantation. In 1787, John Fausett (son of Thomas, Jr.) received a patent for 421 acres of land, which he called “Crossroads”, a large portion of which is located within the project area (Horn Papers 1945). That same year he married his first cousin Anne Fausett (daughter of Joseph) and they established their homestead on the present day farm.

After Fausett’s death his heirs sold the property to Samuel Logan who in turn sold the farm to Samuel McPherson in 1842. McPherson transferred the Fawcett Farm to his son William B. McPherson in 1854 (McFarland 1910:1244). William subsequently erected the house, barn and stable, now located on the William D. Morgan Farm, and like his father started a sheep farm. Census records and historic maps indicate that he had a substantial size farm with 345 sheep by 1880 (Caldwell 1876). Upon William’s death the property passed through a succession of heirs until it was sold in 1948 to Robert M. Morgan, father of the present owner. Outbuildings that stand on the present day site include a nineteenth century, two story frame stable located east of the main house and a nineteenth century two-and-a-half story frame and fieldstone bank barn located southwest of the main house, and a vehicle shed and garage south of the main house.

*Robert L. Morgan Farm (North Farm)*

The Robert L. Morgan Farm is comprised of extensive fields, several outbuildings and two farmhouses. The two story, vinyl sided rectangular dwelling with cut-stone foundation located to the north is owned by Robert L. Morgan, Jr. It is believed that John Fawcett, Jr. circa 1860 (Black 1999) built this dwelling. Other mid-nineteenth century buildings include a small frame summerhouse located to the north, a two-story frame barn to the east and a one-and-a-half story frame wagon shed to the southeast. An 1876 engraving shows the house, wagon shed and barn. Aside from alterations due to modernization, the buildings are identical to those that are present on the property today.
The second house is located to the south and was constructed circa 1915-1920. The two-and-a-half story, frame "Foursquare" clad in asbestos siding has a slate shingle hipped roof with interior brick chimneys on the north and south slopes.

The ownership history of the Robert L. Morgan Farm is identical to that of his brother's except for an addition to the northern portion of the original Fawcett "Cross Roads" Plantation during the third decade of the nineteenth century. The addition was formerly part of Thomas Fawcett's "Sheepfield" tract, patented circa 1786. In 1832, John Fawcett's heirs purchased "Sheepfield" and shortly thereafter his son John Fawcett, Jr. purchased the tract that contains the Robert L. Morgan, Jr. nineteenth century farmhouse to the north (Washington County Deed Book 2P, page 313).

**Recommendations**

No impacts to cultural resources would occur under a No-Action alternative.

Observations made during the pedestrian survey and information gathered from the review of state site files indicate that there are suitable locations for prehistoric occupation within the preliminary APE. In addition to Mr. Morgan collecting a number of artifacts from the property, two known sites are located on his farm. Although no known archaeological sites were recorded within the Robert L. Morgan farm, two prominent high spots along the eastern edge of the APE with level tops suggest a favorable location for settlement. If the property is developed for a proposed national cemetery, previously unidentified archaeological resources and sites 18WH153 and 18WH417 may be impacted by construction related activities. A Phase IB survey, may be necessary to identify cultural resources within areas that have a moderate to high potential for their presence.

Additional work is not recommended for either of the standing farms or their associated outbuildings. Both farm complexes were part of a Historic Resources Survey and Determination of Eligibility Report in 1999 as part of the Southern Beltway Transportation Project. The Bureau of Historic Preservation, Pennsylvania Historical and Museum Commission determined that they were not eligible for listing in the National Register of Historic Places because they lacked integrity (ER #89-1378-042-S and ER #89-1378-042-W).
References Cited

Black, Laura S.

Caldwell, J.A.

Horn, W.F.
1945  The Horn Papers - Early Westward Movement on the Monongahela and Upper Ohio - 1765-1795. Waynesburg, PA: Greene County Historical Society.

McFarland, Joseph F.

References Consulted

De Paul, Carol Boice Jones (Compiler) and Andrew Knez, Jr.
1997  The Boyces.

Crumrine, Boyd

Forrest, Earle R.

McElwain, Wilbur J.

Miller, Paula R., Samuel Trachtenburg, Philip Ruth, and Kenneth J. Basalik, Ph.D
United States Bureau of Census
1850  *Seventh Census of the Population of the United States.*

1860  *Eighth Census of the Population of the United States.*

1880  *Agricultural Schedules.*


Washington County Register of Wills Office, Washington County Courthouse, Washington, PA.

Washington County Tax Assessor’s Office, Washington County Courthouse, Washington County, PA.

Zinser, Katherine K. and Raymond M. Bell
Bowie, MD: Heritage Books Inc.
TO EXPEDITE REVIEW USE
BHP REFERENCE NUMBER

December 16, 2003

Curtis Biondich
CDC, Inc.
560 Penn Street
Verona, PA 15147

Re: ER# 2001-2888-125-E
VA: Phase I Archaeological Investigation, Proposed Pittsburgh National Cemetery, Cecil Twp., Washington County, PA

Dear Mr. Biondich:

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above named project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation. These requirements include consideration of the project’s potential effect upon both historic and archaeological resources.

This report meets our standards and specifications as outlined in Cultural Resource Management in Pennsylvania: Guideline for Archaeological Investigations (BHP 1991) and the Secretary of the Interior’s guidelines for the treatment of archaeological properties. We agree with the recommendations of this report in that the Tombstone site (36WH153) will be avoided during all future ground disturbing activities (we recommend permanently delineating the site boundaries in the field), and the Morgan site (36WH417), the Morgan 2 site (36WH1371), and the Morgan 3 site (36WH1372) will require further National Register determination testing if these areas cannot be avoided.

Please send four copies of the final report (one unbound and all with original photographs) for our files and distribution to the various repositories. Append a signed gift agreement for archaeological collections to the final report and state where and when the collection will be permanently curated.

If you need further information in this matter please consult Chan Funk at (717) 772-0924.

Sincerely,

Kurt W. Carr, Chief
Division of Archaeology & Protection

cc: VA, National Cemetery Association, Washington, DC 20420
Attachment B

Excerpt from the 2004 Phase I Archaeological Survey and Consultation Letter
6.0 CONCLUSIONS AND RECOMMENDATIONS

The proposed undertaking involves the development of the Pittsburgh National Cemetery in Cecil Township, Washington County, Pennsylvania. The APE involves approximately 290 acres located approximately 15 miles south of Pittsburgh in the northern portion of Washington County. A Phase I Archaeological Survey was required by BHP for this project.

Background research conducted for this project indicated the presence of two previously documented historic farmsteads and two previously documented archaeological sites within the APE. The historic properties, William D. Morgan Farm and Robert L. Morgan Farm, were previously determined not eligible for the National Register of Historic Places. The National Register eligibility of the two archaeological sites, the Tombstone Site (36Wh153) and the Morgan Site (36Wh417), have yet to be determined.

The research design for this project considered several important factors for predicting sites in the APE including the fact that two historic farmsteads and two archaeological sites were previously recorded within the project boundaries. Based on past cultural resource studies in the general region, environmental variables such as distance to water, degree of slope, soil drainage, and topography are strong correlates to site locations. Portions of the APE, therefore, represent high probability areas for the discovery of archaeological sites. Factors reducing the archaeological potential of other portions of the APE include highway construction impacts, agricultural impacts, poorly drained soils, and moderately to steeply sloping topography.

Phase I field methods involved surface surveillance, surface collection, and the excavation of shovel tests probes. A total of four archaeological sites were identified in the APE. The Tombstone Site (36Wh153) is a previously recorded small historic family cemetery with a prehistoric site component. GPR was used to define the cemetery boundaries within tested Area A (Appendix III). No prehistoric artifacts, fire-cracked rock and other evidence of prehistoric archaeological sites were found during Phase I testing in the cemetery area. The
existing cemetery will be avoided during construction; therefore, no additional work is recommended for the Tombstone Site.

The Morgan Site (36Wh417) is a previously recorded prehistoric site of unknown cultural affiliation. The Morgan Site was re-identified in Area B during the current Phase I Survey based on the recovery of eight lithic artifacts in four shovel tests. If the site cannot be avoided during construction, a Phase II Archaeological Survey is recommended for the Morgan Site to determine if the site would be eligible for the National Register under Criterion D for its potential to provide important new information to the field of archaeology.

The Morgan 2 Site was found in Area M and was recorded based on the presence of six lithic artifacts, including one side-notched projectile point, found on the ground surface and in one shovel test. Based on the locations of the six associated artifacts, the size of the Morgan 2 Site is estimated to be 0.05 acres (2,530 square feet; 235 square meters). The Morgan 3 Site was found in Area O and was recorded based on the presence of six lithic artifacts, including one hammerstone fragment, found in four shovel tests. Based on the locations of the six associated artifacts, the size of the Morgan 3 Site is estimated to be 0.1 acres (4,360 square feet; 405 square meters). If these two sites cannot be avoided during construction, a Phase II Archaeological Survey is recommended for the Morgan 2 and Morgan 3 Sites to determine if they would be eligible for the National Register under Criterion D for their potential to provide important new information to the field of archaeology.

Historic artifacts were recovered during shovel testing around the extant structures associated with the William D. Morgan Farm and the Robert L. Morgan Farm. Both landowners indicated areas where they thought privies might be located, and testing was completed in these areas; however, no structural evidence of privy features such as stained soils or building materials was found. The artifacts recovered represent post-Civil War through early twentieth century historic scatters associated with farmsteads already determined not eligible for the National Register. Thus, the artifacts do not meet the requirements of archaeological sites. No further archaeological work is recommended for the farmstead areas.
In summary, this Phase I Archaeological Survey identified the presence of six cultural resources: two previously recorded historic farmsteads (already determined not eligible for the National Register), two previously recorded archaeological sites, and two newly identified prehistoric archaeological sites. The Tombstone Site will be avoided during the proposed construction project. However, if the Morgan, Morgan 2, and Morgan 3 archaeological sites cannot be avoided, then a Phase II Archaeological Survey should be conducted to determine their potential National Register eligibility.
Figure 8

Tombstone Site (36Wh153)
Canonsburg, PA USGS 7.5’ Quad
1 inch = 2000 feet
Table 1

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Figure 1

Inferred Limits of Burial Area from GPR Survey

Geophysical Investigation
Unmarked Cemetery
Hendersonville, Pennsylvania

Figure 9

Inferred Limits of Burial Area
(Map Provided by The Hutchinson Group)
CHRISTINE DAVIS CONSULTANTS, INC.
Phase I Archaeological Survey
Pittsburgh National Cemetery, Washington County

Figure 7
Project Mapping Indicating Area A
(Base Map Provided by MTR)
Curtis Biondich  
CDC, Inc.  
560 Penn Street  
Verona, PA 15147

Re: ER# 2001-2888-125-H  
VA: Phase II Archaeological National Register Evaluations, Proposed  
Pittsburgh National Cemetery, Cecil Twp., Washington County, PA

Dear Mr. Biondich:

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above named project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation. These requirements include consideration of the project's potential effect upon both historic and archaeological resources.

This report meets our standards and specifications as outlined in Cultural Resource Management in Pennsylvania: Guidelines for Archaeological Investigations (BHP 1991) and the Secretary of the Interior's guidelines for the treatment of archaeological properties. As the Morgan site (36WH417), the Morgan #2 site (36WH1371), and the Morgan #3 site (36WH1372) are not eligible for listing on the National Register, we agree with the recommendations of this report and in our opinion no further archaeological work is necessary for this project.

Please send four copies of the final report (one unbound and all with original photographs) for our files and distribution to the various repositories.

If you need further information in this matter please consult Chan Funk at (717) 772-0924 or pfunk@state.pa.us.

Sincerely,

Joan Cutler, Director

cc: Frederick J. Neun, VA, National Cemetery Administration, Washington DC

JC/PSF
Transaction Record for FedEx Location

PLEASE KEEP THIS FOR YOUR RECORDS

The following shipment(s) were scanned:
774715474164

FedEx OnSite at Walgreens 15622
1 Eddie Dowling Hwy
North Smithfield, RI 02896
US

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**LETTER OF TRANSMITTAL**

5 Alfred Circle  
Bedford, Massachusetts 01730  
(781) 275-6050 • Fax (781) 275-5651

To:  
U.S. Fish and Wildlife Service  
Pennsylvania Field Office  
Endangered Species Section  
110 Radnor Rd., Suite 101  
State College, PA 16801

Date: March 15, 2019  
Project No. PNDI-654312

RE:  
National Cemetery of the Alleghenies Proposed Expansion  
USFWS PNDI signed receipt

We are sending you the following items:  
☐ Shop Drawings  ☑ Prints  ☐ Plans  ☑ Under Separate Cover  
☐ Copy of Letter  ☐ Change Order  ☑ Specifications  
☐ Samples

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<td>March 15 2019</td>
<td>Hard copy</td>
<td>PNDI signed receipt with supporting information</td>
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These are transmitted as checked below:

☐ For approval  
☑ For your use  
☑ As requested  
☐ For review and comment

☐ Approved as submitted  
☐ Approved as noted  
☐ Returned for corrections  
☐ For Bid Due

☐ Resubmit ___ copies for approval  
☐ Submit ___ copies for approval  
☐ Return ___ corrected prints  
☐ Prints Returned After Loan To Us

Remarks:
On behalf of VA, please find enclosed the signed PNDI certification form and supporting information.
If additional information is needed, please contact: Mr. Glenn Elliott, U.S. Department of Veterans Affairs,  
Construction & Facilities Management Office, 425 L (eye) Street, NW, Room 6W417a, Washington, D.C., 20001, via  
e-mail to glenn.elliott@va.gov, or by telephone at (202) 632-5879.

Sent Via:  
☐ First Class Mail  ☐ Your Messenger  ☑ Federal Express  ☐ Air Mail  
☐ Parcel Post  ☐ Our Messenger

MABBETT & ASSOCIATES, INC.  
BY:  

Signed:  

Copy To: Mr. Glenn Elliott (VA OCFM)  

©2019, Mabbett & Associates, Inc.  
INC Letter Of Transmittal for USFWS PNDI - March 15 2019

Andrew Glucksman
1. PROJECT INFORMATION

Project Name: National Cemetary of the Alleghenies Expansion
Date of Review: 4/5/2018 04:12:15 PM
Project Category: Development, New public/community development (school, library, church, museum)
Project Area: 155.93 acres
County(s): Washington
Township/Municipality(s): CECIL
ZIP Code: 15017; 15317
Quadrangle Name(s): CANONSBURG
Watersheds HUC 8: Upper Ohio
Watersheds HUC 12: Middle Chartiers Creek
Decimal Degrees: 40.314211, -80.156992
Degrees Minutes Seconds: 40° 18' 51.1602" N, 80° 9' 25.1702" W

2. SEARCH RESULTS

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<th>Results</th>
<th>Response</th>
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<td>No Further Review Required, See Agency Comments</td>
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<tr>
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<td>No Known Impact</td>
<td>No Further Review Required</td>
</tr>
<tr>
<td>PA Fish and Boat Commission</td>
<td>No Known Impact</td>
<td>No Further Review Required</td>
</tr>
<tr>
<td>U.S. Fish and Wildlife Service</td>
<td>Avoidance Measure</td>
<td>See Agency Response</td>
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As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate there may be potential impacts to threatened and endangered and/or special concern species and resources within the project area. If the response above indicates "No Further Review Required" no additional communication with the respective agency is required. If the response is "Further Review Required" or "See Agency Response," refer to the appropriate agency comments below. Please see the DEP Information Section of this receipt if a PA Department of Environmental Protection Permit is required.
National Cemetery of the Alleghenies Expansion

Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community.
3. AGENCY COMMENTS
Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are valid for two years (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt. The jurisdictional agencies strongly advise against conducting surveys for the species listed on the receipt prior to consultation with the agencies.

PA Game Commission
RESPONSE:
Conservation Measure: Potential impacts to state and federally listed species which are under the jurisdiction of both the Pennsylvania Game Commission (PGC) and the U.S. Fish and Wildlife Service may occur as a result of this project. As a result, the PGC defers comments on potential impacts to federally listed species to the U.S. Fish and Wildlife Service. No further coordination with the Pennsylvania Game Commission is required at this time.

PGC Species: (Note: The Pennsylvania Conservation Explorer tool is a primary screening tool, and a desktop review may reveal more or fewer species than what is listed below.)

<table>
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<tr>
<th>Scientific Name</th>
<th>Common Name</th>
<th>Current Status</th>
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<tbody>
<tr>
<td>Sensitive Species**</td>
<td>Special Concern Species*</td>
<td></td>
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</table>

PA Department of Conservation and Natural Resources
RESPONSE:
No Impact is anticipated to threatened and endangered species and/or special concern species and resources.
PA Fish and Boat Commission
RESPONSE:
No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

U.S. Fish and Wildlife Service
RESPONSE:
Avoidance Measure: The proposed project is in the vicinity of a northern long-eared bat maternity roost(s). To avoid prohibited incidental take of northern long-eared bats during the pup season, do not conduct any tree removal from June 1 to July 31. Tree removal is defined as cutting down, harvesting, destroying, trimming, or manipulating trees, saplings, or snags. This seasonal restriction on tree removal is not required when removing hazardous trees for the protection of human life and property, as incidental take resulting from hazardous tree removal is exempted by the U.S. Fish and Wildlife Service's 4(d) rule (https://www.fws.gov/midwest/endangered/mammals/nlba).

As the project proponent or applicant, I certify that I will implement the above Avoidance Measure:
_________________________________________ (Signature)

SPECIAL NOTE: If you agree to implement the above Avoidance Measure, no further coordination with this agency regarding threatened and endangered species and/or special concern species and resources is required. If you are not able to comply with the Avoidance Measures, you are required to coordinate with this agency - please send project information to this agency for review (see "What to Send" section).

* Special Concern Species or Resource - Plant or animal species classified as rare, tentatively undetermined or candidate as well as other taxa of conservation concern, significant natural communities, special concern populations (plants or animals) and unique geologic features.
** Sensitive Species - Species identified by the jurisdictional agency as collectible, having economic value, or being susceptible to decline as a result of visitation.

WHAT TO SEND TO JURISDICTIONAL AGENCIES

If project information was requested by one or more of the agencies above, upload* or email* the following information to the agency(s). Instructions for uploading project materials can be found here. This option provides the applicant with the convenience of sending project materials to a single location accessible to all three state agencies. Alternatively, applicants may email or mail their project materials (see AGENCY CONTACT INFORMATION).
*Note: U.S. Fish and Wildlife Service requires applicants to mail project materials to the USFWS PA field office (see AGENCY CONTACT INFORMATION). USFWS will not accept project materials submitted electronically (by upload or email).

Check-list of Minimum Materials to be submitted:
_____ Project narrative with a description of the overall project, the work to be performed, current physical characteristics of the site and acreage to be impacted.
_____ A map with the project boundary and/or a basic site plan (particularly showing the relationship of the project to the physical features such as wetlands, streams, ponds, rock outcrops, etc.)
In addition to the materials listed above, USFWS REQUIRES the following
_____ SIGNED copy of a Final Project Environmental Review Receipt

The inclusion of the following information may expedite the review process.
_____ Color photos keyed to the basic site plan (i.e. showing on the site plan where and in what direction each photo was taken and the date of the photos)
_____ Information about the presence and location of wetlands in the project area, and how this was determined (e.g., by a qualified wetlands biologist), if wetlands are present in the project area, provide project plans showing the location of all project features, as well as wetlands and streams.
4. DEP INFORMATION

The Pa Department of Environmental Protection (DEP) requires that a signed copy of this receipt, along with any required documentation from jurisdictional agencies concerning resolution of potential impacts, be submitted with applications for permits requiring PNDI review. Two review options are available to permit applicants for handling PNDI coordination in conjunction with DEP’s permit review process involving either T&E Species or species of special concern. Under sequential review, the permit applicant performs a PNDI screening and completes all coordination with the appropriate jurisdictional agencies prior to submitting the permit application. The applicant will include with its application, both a PNDI receipt and/or a clearance letter from the jurisdictional agency if the PNDI Receipt shows a Potential Impact to a species or the applicant chooses to obtain letters directly from the jurisdictional agencies. Under concurrent review, DEP, where feasible, will allow technical review of the permit to occur concurrently with the T&E species consultation with the jurisdictional agency. The applicant must still supply a copy of the PNDI Receipt with its permit application. The PNDI Receipt should also be submitted to the appropriate agency according to directions on the PNDI Receipt. The applicant and the jurisdictional agency will work together to resolve the potential impact(s). See the DEP PNDI policy at https://conservationexplorer.dcnr.pa.gov/content/resources.
5. ADDITIONAL INFORMATION
The PNDI environmental review website is a preliminary screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page (www.naturalheritage.state.pa.us). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.

6. AGENCY CONTACT INFORMATION

PA Department of Conservation and Natural Resources
Bureau of Forestry, Ecological Services Section
400 Market Street, PO Box 8552
Harrisburg, PA 17105-8552
Email: RA-HeritageReview@pa.gov

U.S. Fish and Wildlife Service
Pennsylvania Field Office
Endangered Species Section
110 Radnor Rd; Suite 101
State College, PA 16801
NO Faxes Please

PA Fish and Boat Commission
Division of Environmental Services
595 E. Rolling Ridge Dr., Bellefonte, PA 16823
Email: RA-FBPACENOTIFY@pa.gov

PA Game Commission
Bureau of Wildlife Habitat Management
Division of Environmental Planning and Habitat Protection
2001 Elmerton Avenue, Harrisburg, PA 17110-9797
Email: RA-PGC_PNDI@pa.gov
NO Faxes Please

7. PROJECT CONTACT INFORMATION

Name: Mr. Glenn Elliott
Address: 425 I (eye) Street, NW, Room 6W417a
City, State, Zip: Washington, D.C. 20001
Phone: (202) 632-5879 Fax: (____) _______
Email: glenn.elliott@va.gov

8. CERTIFICATION
I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions that were asked during this online review change, I agree to re-do the online environmental review.

Glenn Elliott
applicant/project proponent signature

1/18/2019
date
Pennsylvania Natural Diversity Inventory Certification (PNDI-654312)

Supporting Information

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration completed a Draft Site-Specific Environmental Assessment (SEA) under the National Environmental Policy Act (NEPA) to assess the potential environmental impacts of the Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania (Figure 1). The Proposed Action would extend the longevity of NCOTA for future generations of Veterans and their families in southwestern Pennsylvania.

Under the Proposed Action, the Phase 3 expansion would be constructed over the next two years in the northern portion of NCOTA property and would provide approximately 13,500 new burial areas and minor infrastructure improvements, using the design specified in the 2018 Master Plan (Figure 2A). VA would apply the 2018 Master Plan design for up to 10 potential future expansion phases in the southern portion of NCOTA property, which is currently open pasture land (Figure 2B). VA would evaluate the need to implement each potential future expansion phase approximately every 8-10 years. Separate NEPA assessments would be completed prior to implementing each potential future expansion phase. Over the course of full buildout of the 2018 Master Plan, the southern expansion phases would provide a total of approximately 50,900 new burial areas, roadways, and infrastructure improvements including stormwater and irrigation management systems.

As described in the Draft SEA, the Proposed Action incorporates measures to avoid and minimize impacts to the environment, including the time-of-year restriction on tree clearing from June 1 to July 31 as recommended by USFWS to avoid potential impacts to the northern long-eared bat.

VA published a notice of availability in the Pittsburg Post-Gazette announcing the release of the Draft SEA and opportunity to comment during a 30-day review period from December 16, 2018, to January 16, 2019. Additionally, VA mailed letters dated December 10, 2018 to regulatory agencies, including the U.S. Fish and Wildlife Service (USFWS), announcing the release of the Draft SEA and the opportunity to comment during the 30-day review period.

Based on the Pennsylvania Natural Heritage Program - Pennsylvania Natural Diversity Inventory (PNDI) review process, and as requested by USFWS (via the PNDI), the enclosed signed PNDI documentation certifies VA’s commitment to the aforementioned avoidance measure.
Figure 1. Site Location
Figure 2A. Proposed Action: 2018 Master Plan for Phase 3 and Potential Future Expansion Phases
Figure 2B. Proposed Action: 2018 Master Plan Phasing Detail
Glenn Elliott  
U.S. Department of Veterans Affairs  
425 I Street, NW, Room 6W417a  
Washington, D.C. 20001  
Email: glenn.elliott@va.gov (hard copy will not follow)

Re: National Cemetery of the Alleghenies – SEA, 2018 Site Expansion Master Plan  
Cecil Township, Washington County, PA

Dear Mr. Elliott,

Thank you for notifying our agency that a Draft Site-Specific Environmental Assessment (SEA) was prepared for the proposed expansion of the National Cemetery of the Alleghenies (NCOTA). PA Department of Conservation and Natural Resources performed a Pennsylvania Natural Diversity Inventory (PNDI) environmental review of this project, screening it for potential impacts to species and resources under DCNR’s responsibility, which includes plants, terrestrial invertebrates, natural communities, and geologic features only.

No Impact Anticipated

PNDI records indicate species or resources under DCNR’s jurisdiction are near the project. However, based on the information you submitted concerning the nature of the project, the immediate location, and our detailed resource information, DCNR has determined that no impact is likely to occur as a result of the Phase 3 expansion in the northern portion of the NCOTA property. At this time, our agency does not anticipate any impacts regarding the 10 potential future expansion phases in the southern portion of the property.

As a reminder, this finding applies to potential impacts under DCNR’s jurisdiction only. Visit the PNHP website for directions on contacting the Commonwealth’s other resource agencies for environmental review.

Should you have any questions or concerns, please contact Jason Ryndock, Ecological Information Specialist, by phone (717-705-2822) or via email (e-jryndock@pa.gov).

Sincerely

Greg Podniesinski, Section Chief  
Natural Heritage Section
December 10, 2018

Advisory Council on Historic Preservation
Attn: Mr. John Fowler, Executive Director
401 F Street NW, Suite 308
Washington, DC  20014

Dear Advisory Council on Historic Preservation,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) has prepared a Draft Site-Specific Environmental Assessment (SEA) under the National Environmental Policy Act (NEPA) to assess the potential environmental impacts of the Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania (Figure 1).

Under the Proposed Action, the Phase 3 expansion would be constructed according to the 2018 Master Plan (Figure 2). The Phase 3 expansion would be constructed over the next two years in the northern portion of the NCOTA property and would provide approximately 13,500 new burial areas and minor infrastructure improvements. Under the Proposed Action, the VA would use the 2018 Master Plan to determine the location for up to 10 potential future expansion phases in the southern portion of the NCOTA property, which is currently open pasture land (Figure 2). The VA would evaluate the need to implement each potential future expansion phase approximately every 8-10 years. Over the course of full buildout of the 2018 Master plan, the southern expansion phases would provide a total of approximately 50,900 new burial areas, roadways, and infrastructure improvements including stormwater and irrigation management systems. Therefore, the Proposed Action would extend the longevity of the NCOTA for future generations of veterans and their families in southwestern Pennsylvania. Separate NEPA assessments would be performed prior to implementing each potential future expansion phase.

The VA prepared the Draft SEA in accordance with the National Environmental Policy Act (NEPA), (Public Law 91-190, 42 USC 4321-4347 January 1, 1970), amendments, and VA’s Implementing Regulations (38 CFR Part 26).

The VA invites your organization to review the Draft SEA and provide comments within 30 days of receipt of this letter. The Draft SEA is available for review at the Frank Sarris Public Library at 35 North Jefferson Avenue, Canonsburg, Pennsylvania, 15317, and the Bridgeville Public Library at 505 McMillen Street, Bridgeville, Pennsylvania, 15017, and can be downloaded in electronic format from the VA website at http://www.cem.va.gov/cem/EA.asp. The VA has also published a Notice of Availability (NOA) of the Draft SEA in the Pittsburg Post-Gazette to inform and solicit comment from the general public during the 30-day review period. All agency and public comments on the Draft SEA will be addressed and documented in the Final SEA. The VA will publish a NOA upon completion of the Final SEA.

The VA wishes to take every opportunity to work together in a relationship where a Federal, State or local agency has special expertise that can enhance VA's decision-making efforts. Once again, if you would like to provide comments or request additional information, please contact: Mr. Glenn Elliott, U.S. Department of Veterans Affairs, Construction & Facilities Management Office, 425 I (eye) Street, NW, Room 6W417a, Washington, D.C., 20001, via email to glenn.elliott@va.gov, or by telephone at (202) 632-5879. Please reference “National Cemetery of the Alleghenies” in all correspondence.

Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Bureau of Farmland Preservation
Attn: Doug Wolfgang, Bureau Director
2301 N. Cameron Street, Room 402
Harrisburg, PA 17110-0409

Dear Bureau of Farmland Preservation,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) has prepared a Draft Site-Specific Environmental Assessment (SEA) under the National Environmental Policy Act (NEPA) to assess the potential environmental impacts of the Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania (Figure 1).

Under the Proposed Action, the Phase 3 expansion would be constructed according to the 2018 Master Plan (Figure 2). The Phase 3 expansion would be constructed over the next two years in the northern portion of the NCOTA property and would provide approximately 13,500 new burial areas and minor infrastructure improvements. Under the Proposed Action, the VA would use the 2018 Master Plan to determine the location for up to 10 potential future expansion phases in the southern portion of the NCOTA property, which is currently open pasture land (Figure 2). The VA would evaluate the need to implement each potential future expansion phase approximately every 8-10 years. Over the course of full buildout of the 2018 Master plan, the southern expansion phases would provide a total of approximately 50,900 new burial areas, roadways, and infrastructure improvements including stormwater and irrigation management systems. Therefore, the Proposed Action would extend the longevity of the NCOTA for future generations of veterans and their families in southwestern Pennsylvania. Separate NEPA assessments would be performed prior to implementing each potential future expansion phase.

The VA prepared the Draft SEA in accordance with the National Environmental Policy Act (NEPA), (Public Law 91-190, 42 USC 4321-4347 January 1, 1970), amendments, and VA’s Implementing Regulations (38 CFR Part 26).

The VA invites your organization to review the Draft SEA and provide comments within 30 days of receipt of this letter. The Draft SEA is available for review at the Frank Sarris Public Library at 35 North Jefferson Avenue, Canonsburg, Pennsylvania, 15317, and the Bridgeville Public Library at 505 McMillen Street, Bridgeville, Pennsylvania, 15017, and can be downloaded in electronic format from the VA website at http://www.cem.va.gov/cem/EA.asp. The VA has also published a Notice of Availability (NOA) of the Draft SEA in the Pittsburg Post-Gazette to inform and solicit comment from the general public during the 30-day review period. All agency and public comments on the Draft SEA will be addressed and documented in the Final SEA. The VA will publish a NOA upon completion of the Final SEA.

The VA wishes to take every opportunity to work together in a relationship where a Federal, State or local agency has special expertise that can enhance VA's decision-making efforts. Once again, if you would like to provide comments or request additional information, please contact: Mr. Glenn Elliott, U.S. Department of Veterans Affairs, Construction & Facilities Management Office, 425 I (eye) Street, NW, Room 6W417a, Washington, D.C., 20001, via email to glenn.elliott@va.gov, or by telephone at (202) 632-5879. Please reference “National Cemetery of the Alleghenies” in all correspondence.

Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Bureau of Forestry: Pennsylvania Natural Diversity Inventory
Attn: Jeanne Harris
400 Market Street, 6th Floor – Rachel Carson State Office Building
Harrisburg, PA 17101

Dear Bureau of Forestry,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) has prepared a Draft Site-Specific Environmental Assessment (SEA) under the National Environmental Policy Act (NEPA) to assess the potential environmental impacts of the Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania (Figure 1).

Under the Proposed Action, the Phase 3 expansion would be constructed according to the 2018 Master Plan (Figure 2). The Phase 3 expansion would be constructed over the next two years in the northern portion of the NCOTA property and would provide approximately 13,500 new burial areas and minor infrastructure improvements. Under the Proposed Action, the VA would use the 2018 Master Plan to determine the location for up to 10 potential future expansion phases in the southern portion of the NCOTA property, which is currently open pasture land (Figure 2). The VA would evaluate the need to implement each potential future expansion phase approximately every 8-10 years. Over the course of full buildout of the 2018 Master plan, the southern expansion phases would provide a total of approximately 50,900 new burial areas, roadways, and infrastructure improvements including stormwater and irrigation management systems. Therefore, the Proposed Action would extend the longevity of the NCOTA for future generations of veterans and their families in southwestern Pennsylvania. Separate NEPA assessments would be performed prior to implementing each potential future expansion phase.

The VA prepared the Draft SEA in accordance with the National Environmental Policy Act (NEPA), (Public Law 91-190, 42 USC 4321-4347 January 1, 1970), amendments, and VA’s Implementing Regulations (38 CFR Part 26).

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Pennsylvania Bureau of Forestry
Attn: Daniel A. Devlin, State Forester
400 Market Street, 6th Floor – Rachel Carson State Office Building
Harrisburg, PA 17101

Dear Pennsylvania Bureau of Forestry,

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Chiappetta Agency, Inc.
Attn: NEPA Compliance Director
1225 Eighth Avenue
Beaver Falls, PA  15010-0439

Dear Chiappetta Agency,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) has prepared a Draft Site-Specific Environmental Assessment (SEA) under the National Environmental Policy Act (NEPA) to assess the potential environmental impacts of the Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania (Figure 1).

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Cecil Township
Attn: Shawn F. Bukovinsky, Police Department Chief
3655 Millers Run Road
Cecil, PA 15321

Dear Police Chief Bukovinsky,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) has prepared a Draft Site-Specific Environmental Assessment (SEA) under the National Environmental Policy Act (NEPA) to assess the potential environmental impacts of the Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania (Figure 1).

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Cecil Township
Attn: Mr. Michael Corle, Sewage Enforcement Officer, Municipal Authority
3655 Millers Run Road
Cecil, PA 15321

Dear Mr. Corle,

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
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Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Cecil Township
Attn: Janet DeFelice, Tax Collector
3655 Millers Run Road
Cecil, PA 15321

Dear Ms. DeFelice,

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Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Cecil Township
Attn: Mr. Donald A. Gennuso, Township Manager
3655 Millers Run Road
Cecil, PA 15321

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U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Cecil Township
Attn: Mr. Bruce Bossle, Director of Zoning, Building, Planning & Zoning Department
3655 Millers Run Road
Cecil, PA 15321

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Fish and Wildlife Services Pennsylvania Field Office
Attn:  Lora Zimmerman, Project Leader/Supervisor
315 S. Allen Street, Suite 322
State College, PA  16801-4850

Dear Fish and Wildlife Services,

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U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures:  Figures 1 and 2
December 10, 2018

First Energy Corp.
Attn: NEPA Compliance Director
76 South Main Street
Akron, OH  44308

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

National Resources Conservation Service
Attn: Tom Sierzega, Jr.
214 Donohoe Road, Suite C
Greensburg, PA  15601

Dear National Resources Conservation Service,

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

American Water Company  
Attn: NEPA Compliance Director  
800 W. Hersheypark Drive  
Hershey, PA  17033

Dear American Water Company,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) has prepared a Draft Site-Specific Environmental Assessment (SEA) under the National Environmental Policy Act (NEPA) to assess the potential environmental impacts of the Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania (Figure 1).

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Pennsylvania Bureau for Historic Preservation
Attn: Serena Bellew, Bureau Director/Deputy SHPO
400 North Street, 2nd Floor – Commonwealth Keystone Building
Harrisburg, PA 17120-0093

Dear Pennsylvania Bureau for Historic Preservation,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) has prepared a Draft Site-Specific Environmental Assessment (SEA) under the National Environmental Policy Act (NEPA) to assess the potential environmental impacts of the Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania (Figure 1).

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Pennsylvania Department of Agriculture
Attn: George Greig, Secretary
2301 N. Cameron Street
Harrisburg, PA 17110

Dear Pennsylvania Department of Agriculture,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) has prepared a Draft Site-Specific Environmental Assessment (SEA) under the National Environmental Policy Act (NEPA) to assess the potential environmental impacts of the Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania (Figure 1).

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Pennsylvania Department of Agriculture – Region IV
Attn: Jim Kennedy, Regional Director
6 McIntyre Road
Gibsonia, PA 15044-9644

Dear Pennsylvania Department of Agriculture,

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Pennsylvania Department of Conservation and Natural Resources
Attn: Ellen Ferretti, Secretary
400 Market Street, 6th Floor – Rachel Carson State Office Building
Harrisburg, PA 17105-8767

Dear Pennsylvania Department of Conservation and Natural Resources,

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Sincerely,
U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Pennsylvania Department of Environmental Protection
Attn: E. Christopher Abruzzo, Secretary
400 Market Street - Rachel Carson State Office Building
Harrisburg, PA 17101

Dear Pennsylvania Department of Environmental Protection,

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Sincerely,
U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Pennsylvania Department of Environmental Protection – Southwest Regional Office
Attn: Sue Malone, Director
400 Waterfront Drive
Pittsburgh, PA 15222-4745

Dear Pennsylvania Department of Environmental Protection,

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U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Pennsylvania Department of Military and Veterans Affairs
Attn: Chuck Pollacci, Director
Bldg 7-36, Fort Indiantown Gap
Annville, PA 17003-5002

Dear Pennsylvania Department of Military and Veterans Affairs,

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Pennsylvania Historical and Museum Commission  
Attn.: James M. Vaughn, Executive Director  
300 North Street  
Harrisburg, PA 17120

Dear Pennsylvania Historical and Museum Commission,

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Under the Proposed Action, the Phase 3 expansion would be constructed according to the 2018 Master Plan (Figure 2). The Phase 3 expansion would be constructed over the next two years in the northern portion of the NCOTA property and would provide approximately 13,500 new burial areas and minor infrastructure improvements. Under the Proposed Action, the VA would use the 2018 Master Plan to determine the location for up to 10 potential future expansion phases in the southern portion of the NCOTA property, which is currently open pasture land (Figure 2). The VA would evaluate the need to implement each potential future expansion phase approximately every 8-10 years. Over the course of full buildout of the 2018 Master plan, the southern expansion phases would provide a total of approximately 50,900 new burial areas, roadways, and infrastructure improvements including stormwater and irrigation management systems. Therefore, the Proposed Action would extend the longevity of the NCOTA for future generations of veterans and their families in southwestern Pennsylvania. Separate NEPA assessments would be performed prior to implementing each potential future expansion phase.

The VA prepared the Draft SEA in accordance with the National Environmental Policy Act (NEPA), (Public Law 91-190, 42 USC 4321-4347 January 1, 1970), amendments, and VA’s Implementing Regulations (38 CFR Part 26).

The VA invites your organization to review the Draft SEA and provide comments within 30 days of receipt of this letter. The Draft SEA is available for review at the Frank Sarris Public Library at 35 North Jefferson Avenue, Canonsburg, Pennsylvania, 15317, and the Bridgeville Public Library at 505 McMillen Street, Bridgeville, Pennsylvania, 15017, and can be downloaded in electronic format from the VA website at [http://www.cem.va.gov/cem/EA.asp](http://www.cem.va.gov/cem/EA.asp). The VA has also published a Notice of Availability (NOA) of the Draft SEA in the Pittsburgh Post-Gazette to inform and solicit comment from the general public during the 30-day review period. All agency and public comments on the Draft SEA will be addressed and documented in the Final SEA. The VA will publish a NOA upon completion of the Final SEA.

The VA wishes to take every opportunity to work together in a relationship where a Federal, State or local agency has special expertise that can enhance VA's decision-making efforts. Once again, if you would like to provide comments or request additional information, please contact: Mr. Glenn Elliott, U.S. Department of Veterans Affairs, Construction & Facilities Management Office, 425 I (eye) Street, NW, Room 6W417a, Washington, D.C., 20001, via email to glenn.elliott@va.gov, or by telephone at (202) 632-5879. Please reference “National Cemetery of the Alleghenies” in all correspondence.

Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M  
Environmental Officer  
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
十二月十日，二零一八年

人民的天然气

注意：NEPA合规主任

375北岸大道

匹兹堡，PA 15212

尊敬的人民的天然气，

美国退伍军人事务部（VA）国家墓地管理局（NCA）已准备了一份拟建具体环境评估（SEA）草案，根据《国家环境政策法》（NEPA）进行评估，以评估实施美国退伍军人事务部的2018年墓地扩展Master计划提案的拟议行动对宾夕法尼亚州艾勒格尼国家墓地（NCOTA），位于1158摩根路，桥村，宾夕法尼亚州（图1）的潜在环境影响。

根据拟议行动，第三阶段的扩展将根据2018年Master计划（图2）进行。第三阶段的扩展将被建设在未来两年内，在NCOTA的北部地区，并将提供大约13,500新的墓地和基础设施改进。根据拟议行动，VA将使用2018年Master计划来确定未来最多10个潜在扩展阶段的地点，这些阶段将在NCOTA的南部地区，目前为草地（图2）。VA将每8-10年评估实施每个潜在未来的扩展阶段的需要。在完全实现2018年Master计划的过程中，南部扩展阶段将提供大约50,900新的墓地、道路和基础设施改进，包括暴雨和灌溉管理系统。因此，拟议行动将延长NCOTA的使用寿命，以满足未来几代退伍军人和他们的家庭的需要。

VA已经准备了SEA草案，符合《国家环境政策法》（NEPA），（公共法律91-190，42 USC 4321-4347 January 1, 1970），修正案，以及VA的实施规定（38 CFR Part 26）。

VA邀请您的组织审阅草案SEA并提供意见，自收到本信起30天内。草案SEA可在Frank Sarris公共图书馆，35 North Jefferson Avenue，Canonsburg, Pennsylvania, 15317, 或Bridgeville公共图书馆，505 McMillen Street, Bridgeville, Pennsylvania, 15017, 及VA网站http://www.cem.va.gov/cem/EA.asp下载。VA还发布了一份在Pittsburg Post-Gazette的发布通知，以通知和寻求公众意见。所有机构和公众意见将被记录在最终SEA中。VA将在完成最终SEA后发布发布通知。

VA希望与您合作，在联邦、州或当地机构有特定专业知识的联邦、州或当地机构有特定专业知识时，可以增强VA的决策努力。一旦再次，如果您想提供评论或请求额外信息，请联系：Mr. Glenn Elliott, U.S. Department of Veterans Affairs, Construction & Facilities Management Office, 425 I (eye) Street, NW, Room 6W417a, Washington, D.C., 20001, via电子邮件到glenn.elliott@va.gov，或通过电话（202）632-5879。请参考“艾勒格尼国家墓地”在所有通信中的内容。

此致

美国退伍军人事务部

Glenn Elliott，高级纵向/管理

环境保护官员

enclosures: Figures 1 and 2
December 10, 2018

Pennsylvania Natural Heritage Program
Attn: NEPA Compliance Director
400 Market Street, 6th Floor – Rachel Carson State Office Building
Harrisburg, PA 17101

Dear Pennsylvania Natural Heritage Program,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) has prepared a Draft Site-Specific Environmental Assessment (SEA) under the National Environmental Policy Act (NEPA) to assess the potential environmental impacts of the Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania (Figure 1).

Under the Proposed Action, the Phase 3 expansion would be constructed according to the 2018 Master Plan (Figure 2). The Phase 3 expansion would be constructed over the next two years in the northern portion of the NCOTA property and would provide approximately 13,500 new burial areas and minor infrastructure improvements. Under the Proposed Action, the VA would use the 2018 Master Plan to determine the location for up to 10 potential future expansion phases in the southern portion of the NCOTA property, which is currently open pasture land (Figure 2). The VA would evaluate the need to implement each potential future expansion phase approximately every 8-10 years. Over the course of full buildout of the 2018 Master plan, the southern expansion phases would provide a total of approximately 50,900 new burial areas, roadways, and infrastructure improvements including stormwater and irrigation management systems. Therefore, the Proposed Action would extend the longevity of the NCOTA for future generations of veterans and their families in southwestern Pennsylvania. Separate NEPA assessments would be performed prior to implementing each potential future expansion phase.

The VA prepared the Draft SEA in accordance with the National Environmental Policy Act (NEPA), (Public Law 91-190, 42 USC 4321-4347 January 1, 1970), amendments, and VA’s Implementing Regulations (38 CFR Part 26).

The VA invites your organization to review the Draft SEA and provide comments within 30 days of receipt of this letter. The Draft SEA is available for review at the Frank Sarris Public Library at 35 North Jefferson Avenue, Canonsburg, Pennsylvania, 15317, and the Bridgeville Public Library at 505 McMillen Street, Bridgeville, Pennsylvania, 15017, and can be downloaded in electronic format from the VA website at http://www.cem.va.gov/cem/EA.asp. The VA has also published a Notice of Availability (NOA) of the Draft SEA in the Pittsburg Post-Gazette to inform and solicit comment from the general public during the 30-day review period. All agency and public comments on the Draft SEA will be addressed and documented in the Final SEA. The VA will publish a NOA upon completion of the Final SEA.

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

United States Army Corps of Engineers, Pittsburgh
NEPA Compliance Director
1000 Liberty Avenue
Pittsburgh, PA 15222-4186

Dear United States Army Corps of Engineers,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) has prepared a Draft Site-Specific Environmental Assessment (SEA) under the National Environmental Policy Act (NEPA) to assess the potential environmental impacts of the Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania (Figure 1).

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

United States Department of Agriculture  
NEPA Compliance Director  
1400 Independence Avenue, SW  
Washington, DC  20250

Dear United States Department of Agriculture,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) has prepared a Draft Site-Specific Environmental Assessment (SEA) under the National Environmental Policy Act (NEPA) to assess the potential environmental impacts of the Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania (Figure 1).

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M  
Environmental Officer  
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

United States Environmental Protection Agency
Attn: NEPA Compliance Director
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear United States Environmental Protection Agency,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) has prepared a Draft Site-Specific Environmental Assessment (SEA) under the National Environmental Policy Act (NEPA) to assess the potential environmental impacts of the Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania (Figure 1).

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

United States Environmental Protection Agency – Region III
Attn: Ms. Karen DelGrosso
1650 Arch Street
Philadelphia, PA 19210-3029

Dear United States Environmental Protection Agency,

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
United States Department of the Interior Fish and Wildlife Services  
Attn: NEPA Compliance Director  
1849 C Street, NW  
Washington, DC 20240

Dear United States Department of Veterans Affairs,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) has prepared a Draft Site-Specific Environmental Assessment (SEA) under the National Environmental Policy Act (NEPA) to assess the potential environmental impacts of the Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania (Figure 1).

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M  
Environmental Officer  
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Washington County Board of Commissioners
Attn: Members of the Board
100 W. Beau Street, Suite 702 – Courthouse Square
Washington, PA 15301

Dear Washington County Board of Commissioners,

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Washington County Chamber of Commerce
Attn: NEPA Compliance Director
375 Southpointe Boulevard, Suite 240
Canonsburg, PA 15317

Dear Washington County Chamber of Commerce,

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Washington County Division of Parks and Recreation
Attn: Jeffrey J. Donahue, Superintendent of Recreation
100 W. Beau Street, Suite 705 – Courthouse Square
Washington, PA 15301

Dear Washington County Division of Parks and Recreation,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) has prepared a Draft Site-Specific Environmental Assessment (SEA) under the National Environmental Policy Act (NEPA) to assess the potential environmental impacts of the Proposed Action to implement the VA’s 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Pennsylvania (Figure 1).

Under the Proposed Action, the Phase 3 expansion would be constructed according to the 2018 Master Plan (Figure 2). The Phase 3 expansion would be constructed over the next two years in the northern portion of the NCOTA property and would provide approximately 13,500 new burial areas and minor infrastructure improvements. Under the Proposed Action, the VA would use the 2018 Master Plan to determine the location for up to 10 potential future expansion phases in the southern portion of the NCOTA property, which is currently open pasture land (Figure 2). The VA would evaluate the need to implement each potential future expansion phase approximately every 8-10 years. Over the course of full buildout of the 2018 Master plan, the southern expansion phases would provide a total of approximately 50,900 new burial areas, roadways, and infrastructure improvements including stormwater and irrigation management systems. Therefore, the Proposed Action would extend the longevity of the NCOTA for future generations of veterans and their families in southwestern Pennsylvania. Separate NEPA assessments would be performed prior to implementing each potential future expansion phase.

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U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Washington County Division of Parks and Recreation
Attn: Kevin Garrison, Superintendent of Parks
100 W. Beau Street, Suite 705 – Courthouse Square
Washington, PA 15301

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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

Washington County Department of Veterans Affairs – Recorder of Deeds Office
Attn: Chad Roule, Executive Director Agricultural Land Preservation Program
100 W. Beau Street, Room 204
Washington, PA 15301

Dear Washington County Department of Veterans Affairs,

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U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
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Sincerely,

U.S. Department of Veterans Affairs

Glenn Elliott, Senior PP/M
Environmental Officer
Construction & Facilities Management Office

Enclosures: Figures 1 and 2
December 10, 2018

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Attn: Jim Ross
49 East Maiden Street
Washington, PA 15301

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Environmental Officer
Construction & Facilities Management Office

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100 W. Beau Street, Suite 701 – Courthouse Square
Washington, PA 15301

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Construction & Facilities Management Office

Enclosures: Figures 1 and 2
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Washington County Historical Society
Attn: Jim Ross
49 East Maiden Street
Washington, PA 15301

Cecil Township
Attn: Mr. Michael Corle, Sewage Enforcement Officer, Municipal Authority
1655 Millers Run Road
Cecil, PA 15321

Pennsylvania Department of Military and Veterans Affairs
Attn: Chuck Poliacci, Director
Bldg 7-36, Fort Indiantown Gap
Annapolis, PA 17003-5002

Attn: Mr. Bruce Bossie, Dir of Zoning, Building, Planning & Zoning Dept
3655 Millers Run Road
Cecil, PA 15321
Washington County Chamber of Commerce
Attn: NEPA Compliance Director
375 Southpointe Boulevard, Suite 240
Canonsburg, PA 15317

Pennsylvania Department of Environmental Protection–SW Reg Office
Attn: Sue Malone, Director
400 Waterfront Drive
Pittsburgh, PA 15222-4745
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**Bureau of Farmland Preservation**  
Attn: Doug Wolfgang, Bureau Director  
2301 N. Cameron Street, Room 402  
Harrisburg, PA 17110-0409  

**Pennsylvania Department of Conservation and Natural Resources**  
Attn: Ellen Ferretti, Secretary  
400 Market Street, 6th Floor – Rachel Carson State Office Building  
Harrisburg, PA 17101-6876  

**Pennsylvania Natural Heritage Program**  
Attn: NEPA Compliance Director  
Pennsylvania Bureau of Forestry  
tn: Daniel A. Devlin, State Forester  
30 Market Street, 6th Floor – Rachel Carson State Office Building  
Harrisburg, PA 17101

**Address:**  
Robert M. Black  
2301 N. Cameron Street, Room 402  
Harrisburg, PA 17110-0409  

**Article Number (Transfer from Service Label):**  
7017 3380 0000 2145 7299  
Domestic Return Receipt

**Article Number (Transfer from Service Label):**  
7017 3380 0000 2145 7459  
Domestic Return Receipt

**Article Number (Transfer from Service Label):**  
7017 3380 0000 2145 7305  
International Mail Restricted Delivery

**Article Number (Transfer from Service Label):**  
7018 0680 0000 0936 9892  
Restricted Delivery
Pennsylvania Historical and Museum Commission
Attn.: James M. Vaughn, Executive Director
300 North Street
Harrisburg, PA 17120

PS Form 3811, July 2015 PSN 7530-09-000-9053

Complete items 1, 2, and 3.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.

SEND: COMPLETE THIS SECTION

Complete this section on delivery

A. Signature
   X

B. Received by (Printed Name)

C. Date of Delivery

Dec 18, 2018

Domestic Return Receipt

SEND: COMPLETE THIS SECTION

Article Number (Transfer from service label)

7017 3380 0000 2145 7428

PS Form 3811, July 2015 PSN 7530-09-000-9053

Domestic Return Receipt

SEND: COMPLETE THIS SECTION

Complete this section on delivery

A. Signature

B. Received by (Printed Name)

C. Date of Delivery

Dec 18, 2018

Domestic Return Receipt

SEND: COMPLETE THIS SECTION

Complete this section on delivery

A. Signature
   X

B. Received by (Printed Name)

C. Date of Delivery

Dec 18, 2018

Domestic Return Receipt
Appendix C – Public Involvement
Proof of Publication of Notice in Pittsburgh Post-Gazette

Under Act No 587, Approved May 16, 1929, PL 1784, as last amended by Act No 409 of September 29, 1951

Commonwealth of Pennsylvania, County of Allegheny, ss  K. Flaherty, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Press and the Pittsburgh Post-Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette was established in 1927 by the merging of the Pittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Post-Gazette has been regularly issued in said County and that a copy of said printed notice or publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

07, 09 of December, 2018

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the afore said notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

COPY OF NOTICE OR PUBLICATION

[Image of printed notice]

[Signature]

PG Publishing Company

Sworn to and subscribed before me this day of: December 11, 2018

Commonwealth of Pennsylvania - Notary Seal
Elizabeth R. Chmura, Notary Public
Allegheny County
My commission expires February 8, 2022
Commission number 1326781

STATMENT OF ADVERTISING COSTS
Mabett & Associates, Inc.
10 Dorrance St.
Providence, RI 02903

To PG Publishing Company

Total -------------- $2,053.20

Publisher’s Receipt for Advertising Costs

Y, publisher of the Pittsburgh Post-Gazette, a newspaper of general circulation, of the aforesaid advertising and publication costs and certifies that the same have been fully paid and received by:

PG Publishing Company, a Corporation, Publisher of Pittsburgh Post-Gazette, a Newspaper of General Circulation

By

[Signature]

I hereby certify that the aforesaid advertising and publication costs have been fully paid and received by:

[Signature]

I hereby certify that the aforesaid advertising and publication costs have been fully paid and received by:

[Signature]
Proof of Publication of Notice in Pittsburgh Post-Gazette

Under Act No 587, Approved May 16, 1929, PL 1784, as last amended by Act No 409 of September 29, 1951

Commonwealth of Pennsylvania, County of Allegheny, ss K. Flaherty, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Press and the Pittsburgh Post-Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette was established in 1927 by the merging of the Pittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Post-Gazette has been regularly issued in said County and that a copy of said printed notice or publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

14, 16 of December, 2018

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the afore said notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

COPY OF NOTICE OR PUBLICATION

[Notice Text]

PG PUBLISHING COMPANY hereby acknowledges receipt of said notice and receipt for the Advertising costs in the subject matter of said notice.

Office
2201 Sweeney Drive
CLINTON, PA 15026
Phone 412-263-1338

I hereby certify that the foregoing is the original of said notice.

[Signature]

[Stamp]

STATEMENT OF ADVERTISING COSTS

Mabbett & Associates, Inc.
10 Dorrance St
Providence, RI 02903

To PG Publishing Company

Total ------------------- $2,106.30

Receipt for Advertising Costs

PG Publishing Company, a Corporation, Publisher of Pittsburgh Post-Gazette, a Newspaper of General Circulation

By

[Signature]

[Stamp]

[Date] December 17, 2018

[Notary Public]

[Stamp]
NOTICE OF AVAILABILITY

FINAL SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT and FINDING OF NO SIGNIFICANT IMPACT
FOR THE 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

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) announces the availability of the Final Site-Specific Environmental Assessment (SEA) and Finding of No Significant Impact (FONSI) for the VA’s Proposed Action to implement the 2018 Site Expansion Master Plan for the National Cemetery of the Alleghenies (NCOTA), located at 1158 Morgan Road, Bridgeville, Washington County, Pennsylvania. Under the Proposed Action, the next expansion phase (“Phase 3”) would be constructed over the next two years in the northern portion of NCOTA property based on the 2018 Master Plan design. No new property would be acquired. The Phase 3 expansion would provide approximately 13,500 new burial areas and minor infrastructure improvements. None of the other potential future expansion phases identified in the 2018 Master Plan would be constructed now. Instead, VA would evaluate the need to implement each potential future expansion phase approximately every 8-10 years. Separate Environmental Assessments would be performed prior to implementing each potential future expansion phase. Over the course of full buildout of the remaining expansion phases in the 2018 Master Plan, approximately 50,900 new burial sites, roadways, and infrastructure including stormwater and irrigation management systems would be created in the southern portion of NCOTA. The additional burial capacity would extend the longevity of NCOTA for future generations of Veterans and their families in southwestern Pennsylvania.

Prior to completing the Final SEA, VA completed a Draft SEA to document the potential environmental impacts associated with implementing the Proposed Action. The Draft SEA identified avoidance and management measures incorporated into the Proposed Action that would ensure potential minor adverse impacts would not increase to a significant adverse level during construction and operation. The Draft SEA was made available for regulatory agency and public review and comment from December 7, 2018, to January 16, 2019. 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. No comments from the public were received. Comments from regulatory agencies were not opposed to the Proposed Action and have been incorporated into the Final SEA.

The Draft SEA and Final SEA were prepared in accordance with the National Environmental Policy Act (NEPA), (Public Law 91-190, 42 USC 4321-4347 January 1, 1970), amendments, and VA’s Implementing Regulations (38 CFR Part 26).

Upon review of the Final SEA, VA concludes that implementing the Proposed Action would not constitute a major federal action that would have a significant adverse impact on the quality of the human environment within the meaning of Section 102(2)(C) of NEPA of 1969. Accordingly, VA has finalized a FONSI, which incorporates the Final SEA in its entirety by reference, and concludes that the preparation of an Environmental Impact Statement is not required. The FONSI completes the NEPA review process for this Proposed Action. The Final SEA and FONSI are available for review at the NCOTA Public Information Complex; the Frank Sarris Public Library at 35 North Jefferson Avenue, Canonsburg, Pennsylvania, 15317; the Bridgeville Public Library at 505 McMillen Street, Bridgeville, Pennsylvania, 15017; and can be electronically downloaded from VA’s website at http://www.cem.va.gov/cem/EA.asp.

For additional information, contact: Mr. Fernando Fernandez, U.S. Department of Veterans Affairs, Construction & Facilities Management Office, 425 I (eye) Street, NW, Room 6W417b, Washington, D.C., 20001; by email at fernando.fernandez@va.gov; or by telephone at (202) 632-5529.