DRAFT

ENVIRONMENTAL ASSESSMENT

OF THE PROPOSED LAND ACQUISITION FOR THE EXPANSION OF

CAMP BUTLER NATIONAL CEMETERY

SPRINGFIELD (CLEAR LAKE TOWNSHIP), SANGAMON COUNTY, ILLINOIS

DEPARTMENT OF VETERANS AFFAIRS

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PREPARED BY:

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EXECUTIVE SUMMARY

This Environmental Assessment (EA) has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Department of Veterans Affairs' (VA's) proposed acquisition of approximately 9.6 acres of land (Site) located approximately 170 feet west of the Camp Butler National Cemetery (CBNC) in Springfield (Clear Lake Township), Sangamon County, Illinois for the future expansion of the cemetery. As a Federal action, preparation of this EA is required by the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 *et seq*.), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26). This EA has also been prepared in accordance with the VA NEPA Interim Guidance for Projects dated 30 September 2010.

VA intends to acquire the approximately 9.6-acre Site in 2019 and hold it until such date when the expansion of the CBNC becomes necessary (approximately 5 to 10 years). At that time, and as part of the cemetery design process, VA will perform a supplemental NEPA analysis to reanalyze and reevaluate the potential effects of the construction and operation of the expanded cemetery at the Site. VA will incorporate the avoidance, management, and minimization measures identified in this EA into that future design process and supplemental NEPA analysis to minimize potential adverse environmental effects.

As such, this EA assesses the potential effects of VA's acquiring the Site for the ultimate expansion of the CBNC, and preliminarily assesses the effects of the future proposed construction and operation of the expanded cemetery on the Site. Potential effects of the construction and operation of the proposed expanded CBNC on the Site will be reanalyzed and reevaluated in a subsequent NEPA analysis concurrent with Site design, when the expansion of the CBNC becomes necessary.

PROPOSED ACTION

VA's Proposed Action is to acquire land near the existing CBNC for the future expansion of the cemetery. The future CBNC expansion would provide VA additional capacity to continue providing National Cemetery burial benefits to the regional Veteran community.

VA estimates adequate space remains for burials on current CBNC land through approximately 2029. VA would acquire the Site in 2019 and would hold it until such date when the expansion of the CBNC becomes necessary. It is anticipated that cemetery expansion design and initial development would begin in approximately 5 to 10 years. Design details of the proposed CBNC expansion do not exist at this time; however future gravesite expansion onto the Site would be designed to be similar in appearance to the existing grounds of the CBNC.

PURPOSE AND NEED

The purpose of the Proposed Action is to expand the CBNC to provide a National Cemetery of sufficient size and capacity to serve the projected interment needs of Veterans in central Illinois after the current CBNC burial space is depleted.

A larger, expanded CBNC is needed to continue providing National Cemetery burial benefits to the regional Veteran community. VA estimates space remaining for burials at the CBNC will be fully depleted by 2029. The nearest National Cemetery to CBNC that is accepting new burials is Alton National Cemetery, located approximately 75 miles from CBNC in Alton, Illinois.

One of the primary objectives of the VA burial program is to ensure that burial needs of Veterans and eligible family members are met. NCA further defines this objective on the assumption that the burial needs of a Veteran are met if they have reasonable access to a burial option (whether for caskets, remains, or cremated remains, either in-ground or in a columbarium) in a National or State Veterans Cemetery within 75 miles of the Veteran's place of residence. The Proposed Action would provide VA additional capacity needed to meet its burial objectives for eligible Veterans in the central Illinois area.

ALTERNATIVES

VA considers adjacent/contiguous property to be the first and best option for cemetery expansion as it is the most cost effective and operationally efficient and reduces way finding confusion for visitors. Approximately 9.6 acres of land located approximately 170 feet west of the CBNC, and accessible from CBNC through an easement, is available for sale and has been offered to VA by the current owner at fair market value. No other feasible sites adjacent to the CBNC or in the immediate vicinity of the CBNC were offered to VA or identified as available for acquisition.

This EA examines in-depth two alternatives, the Proposed Action and the No Action Alternative, defined as follows:

- **Proposed Action:** VA would acquire approximately 9.6 acres of unimproved land approximately 170 feet west (with intervening privately owned land) of the CBNC for future expansion of the CBNC. The northern approximately 3.5-acre portion of the Site is wooded land with an overhead electrical easement. The southern approximately 6.1-acre portion of the Site is cultivated agricultural land. After acquisition, the Site would remain unimproved, mostly agricultural land (under a lease agreement) until such date when the expansion of the CBNC becomes necessary. It is anticipated that cemetery design and initial development would begin in approximately 5 to 10 years. The majority of the Site would be developed with the expanded cemetery.

- **No Action Alternative:** Under the No Action Alternative, the Proposed Action would not be implemented. Veterans and their families residing in central Illinois would continue to use the CBNC until space is no longer available. In the future, VA would likely seek other land to expand the CBNC, but may not be able to acquire land contiguous with or near the existing CBNC. The Site likely would remain unimproved, mostly agricultural land.

The Proposed Action effectively provides additional land necessary to meet the regional cemetery requirements of VA. The No Action Alternative would not enable VA to provide adequate cemetery facilities in central Illinois. However, the No Action Alternative is assessed in this EA to provide a comparative baseline analysis, as required under the CEQ Regulations.

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

The affected environment of the Proposed Action Site and its immediate surroundings, or the Region of Influence (ROI) of the Proposed Action is discussed in Section 3 of this EA.

The two considered alternatives, including the Proposed Action and the No Action Alternative, are evaluated in this EA to determine their potential direct or indirect impact(s) on the physical, environmental, cultural, and socioeconomic aspects of the Proposed Action's ROI. Technical areas evaluated in this EA include:

- *Aesthetics*
- *Air Quality*
- *Cultural Resources*
- *Geology, Topography, and Soils*
- *Hydrology and Water Quality*
- *Wildlife and Habitat*
- *Noise*
- *Land Use*
- *Floodplains, Wetlands, and Coastal Zone Management*
- *Socioeconomics*
- *Community Services*
- *Solid and Hazardous Materials*
- *Transportation and Parking*
- *Utilities*
- *Environmental Justice*
- *Cumulative Impacts*
- *Potential for Generating Substantial Controversy*

<u>Proposed Action</u>

The Proposed Action would result in the impacts identified throughout Section 3 and summarized in Table 7 of this EA. These include potential adverse impacts to aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, wildlife and habitat, noise, land use, solid and hazardous materials, transportation, utilities and environmental justice. These potential impacts are less-than-significant and would be further reduced through careful implementation of the Best Management Practices (BMPs), management and minimization measures, and compliance with regulatory requirements as identified in Section 5.

The CBNC and the approximately 9.6-acre Site both occupy a portion of the former Camp Butler military installation that housed Union soldiers and Confederate prisoners-of-war during the Civil War. The Site and area immediately adjoining to the east were used as barracks from 1862 to 1866, when Camp Butler was closed.

The acquisition of the Site by VA would have no adverse effects on cultural resources. The Illinois State Historic Preservation Office (SHPO) concurred with this determination. The future expansion of the CBNC at the Site could have direct impacts on historic cultural resources associated with former Camp Butler. Prior to completing the expanded cemetery design, a ground-disturbing, archaeological investigation of the Site would be conducted in consultation with SHPO. VA would formally determine the eligibility of any identified historic features for listing on the National Register of Historic Places (NRHP) and would determine the potential adverse

effects of the proposed cemetery expansion development in consultation with SHPO. If historic features eligible for listing on the NRHP are identified that would be adversely affected by the proposed CBNC expansion, VA would enter into a Memorandum of Agreement (MOA) with SHPO, Advisory Council on Historic Preservation (ACHP), and other interested parties under Section 106 of the National Historic Preservation Action (NHPA) to mitigate any adverse effects. With the completion of these NHPA mitigation measures, cultural resources impacts would be minimized or avoided.

The Proposed Action provides VA additional capacity to continue to provide National Cemetery burial benefits to the regional Veteran community, contiguous with the existing CBNC, a significant beneficial socioeconomic effect.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented. Veterans and their families residing in the central Illinois area would continue to use the CBNC until space is no longer available. In the future, VA would likely seek other land to expand the CBNC, but may not be able to acquire land contiguous or near with the existing CBNC. The Site likely would remain unimproved, mostly agricultural land.

Cumulative Impacts

The EA also examines the potential cumulative effects of implementing each of the considered alternatives. This analysis finds that the Proposed Action, with the implementation of the management and minimization measures specified in this EA, would not result in significant adverse cumulative impacts to onsite or regional natural or cultural resources, and would maintain the socioeconomic environment of the area through long-term provision of required cemetery facilities for regional Veterans. The No Action Alternative would not produce these potential beneficial socioeconomic gains.

AGENCY AND PUBLIC INVOLVEMENT

VA consulted with the following agencies during the preparation of this EA: US Fish and Wildlife Service (USFWS), US Environmental Protection Agency (USEPA), US Army Corps of Engineers (USACE), United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS), Illinois Environmental Protection Agency (IEPA), Illinois Department of Transportation (ILDOT), Illinois Department of Natural Resources (IDNR), IDNR Historic Preservation Division (State Historic Preservation Office or SHPO), various Sangamon County departments, Clear Lake Township, and the City of Springfield. Reponses were received from the USACE, USDA NRCS, IDNR, SHPO, IEPA, Sangamon County Water Reclamation District (SCWRD), Sangamon County Department of Public Health (SCDPH), Springfield – Sangamon County Regional Planning Commission (SSCRPC), and Clear Lake Township. Agency information and comments have been incorporated into this EA, as and where appropriate, and are summarized in Section 4. Copies of relevant correspondence can be found in Appendix A.

Six Federally-recognized Native American tribes were identified as having possible ancestral ties to the Site area. VA invited these tribes to provide input regarding the Proposed Action. As of

the date of this EA, no responses have been received from the Tribes. Tribal correspondence is provided in Appendix B.

VA will publish and distribute the Draft EA for a 30-day public comment period as announced by a Notice of Availability (NOA) published in the State Journal – Register, a local newspaper of general circulation. A copy of the Draft EA will be made available for public review at a local public library and on the VA National Cemetery Administration website (www.cem.va.gov/cpm/EA.asp). VA will respond to provided comments regarding the Draft EA within the Final EA.

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SECTION 1: INTRODUCTION

1.1 Introduction

This Section provides the reader with necessary introductory and background information concerning the Proposed Action for proper analytical context; identifies the purpose of and need for the Proposed Action; and describes the Federal decision to be made concerning the Proposed Action. Section 4 provides a summary of public and agency involvement (and key issues and concerns identified). Section 11 identifies Federal, State, and local regulations applicable to the Proposed Action.

This Environmental Assessment (EA) has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic effects associated with the Department of Veterans Affairs' (VA's) Proposed Action to acquire land near the existing Camp Butler National Cemetery (CBNC), located at 5063 Camp Butler Road in Springfield (Clear Lake Township), Sangamon County, Illinois, for the future expansion of the cemetery.

Preparation of this EA is required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 *et seq*.), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26). This EA has been prepared in accordance with VA's *NEPA Interim Guidance for Projects* (2010).

VA intends to acquire the approximately 9.6-acre Site located approximately 170 feet west (with intervening privately owned land) of the CBNC in 2019 and hold it until such date when the expansion of the CBNC becomes necessary (approximately 5 to 10 years). At that time, and as part of the cemetery design process, VA will perform a supplemental NEPA analysis to reanalyze and reevaluate the potential effects of the construction and operation of the expanded cemetery at the Site. VA will incorporate the avoidance, management, and minimization measures identified in this EA into that future design process and supplemental NEPA analysis to minimize potential adverse environmental effects.

This approach is fully consistent with the NEPA and CEQ Regulations. In cases such as these, the CEQ Regulations establish and recommend a "tiered" approach to the environmental impact analysis process: "Agencies are encouraged to tier their environmental (documents)…to focus on the actual issues ripe for decision at each level of environmental review….Tiering may also be appropriate for different stages of actions" (40 CFR Part 1502.20). These regulations specify that such potentialities (i.e., the ultimate construction and operation of the expanded cemetery) should be introduced, but can be deferred to future analyses and documentation when they have "ripened," or when more complete information becomes available.

As such, this EA assesses the potential effects of acquiring the Site for the ultimate expansion of the CBNC, and preliminarily assesses the effects of the future proposed construction and

operation of the cemetery on the Site. Potential effects of the construction and operation of the proposed expanded CBNC on the Site will be reanalyzed and reevaluated in a supplemental NEPA analysis concurrent with Site design, when the expansion of the CBNC becomes necessary.

1.2 Background

VA is proposing to purchase approximately 9.6 acres of land located approximately 170 feet west of the CBNC (the Site) from the current Site owner. The northern approximately 3.5-acre portion of the Site is unimproved wooded land with an overhead electrical easement along the northern boundary. The southern approximately 6.1-acre portion of the Site is cultivated agricultural land. The Site location and features are depicted on Figures 1 through 3.

The CBNC and the approximately 9.6-acre Site both occupy a portion of the former Camp Butler military installation that housed Union soldiers and Confederate prisoners-of-war during the Civil War. The Site and area immediately adjoining to the east were used as barracks from 1862 to 1866, when the original Camp Butler was closed. After the closure of Camp Butler, the Site and surrounding areas were returned to private landowners to be used for agricultural purposes. The Site has been used for agricultural purposes since that time.

The approximately 53-acre existing CBNC provides National Cemetery burial benefits to Veterans and their families in central Illinois and is operated by the VA National Cemetery Administration (NCA). The CBNC includes the original 1862 Camp Butler cemetery. VA estimates adequate space remains for burials at the CBNC through approximately 2029; however, additional land is needed for continued CBNC operations in the future. VA would acquire the Site in 2019 and would hold it until such date when the expansion of the CBNC becomes necessary. It is anticipated that cemetery design and initial development would begin in approximately 5 to 10 years. Design details of the proposed CBNC expansion do not exist at this time; however, future gravesite expansion onto the Site would be designed to be similar in appearance to the existing grounds of the CBNC.

1.3 Purpose and Need

The purpose of the Proposed Action is to expand the CBNC to provide a National Cemetery of sufficient size and capacity to serve the projected interment needs of Veterans in central Illinois after the current CBNC burial space is depleted.

A larger, expanded CBNC is needed to continue providing National Cemetery burial benefits to the regional Veteran community. VA estimates space remaining for burials at the CBNC will be fully depleted by 2029. The nearest National Cemetery to CBNC that is accepting new burials is Alton National Cemetery, located approximately 75 miles from CBNC in Alton, Illinois.

One of the primary objectives of the VA burial program is to ensure that burial needs of Veterans and eligible family members are met. NCA further defines this objective on the assumption that the burial needs of a Veteran are met if they have reasonable access to a burial option (whether for caskets, remains, or cremated remains, either in-ground or in a columbarium) in a National or State Veterans Cemetery within 75 miles of the Veteran's place of residence. The Proposed

Action would provide VA additional capacity needed to meet its burial objectives for eligible Veterans in the central Illinois area.

1.4 Decision-Making

This EA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic effects associated with VA's proposed acquisition of approximately 9.6 acres of land located approximately 170 feet west of the CBNC for the future expansion of the cemetery.

VA, as a Federal agency, is required to incorporate environmental considerations into their decision-making process for the actions they propose to undertake. This is done in accordance with the regulations identified in Section 1.1.

In accordance with the NEPA regulations described above, this EA: allows for public input into the Federal decision-making process; provides Federal decision-makers with an understanding of potential environmental effects of their decisions, before making these decisions; identifies measures the Federal decision-maker could implement to reduce potential adverse environmental effects; and documents the NEPA process.

Ultimately, VA will decide, in part based on the analysis presented in this EA and after having taken potential physical, environmental, cultural, and socioeconomic effects into account, whether VA should implement the Proposed Action, and, as appropriate, carry out management, avoidance, and mitigation (if necessary) measures to reduce effects to the environment.

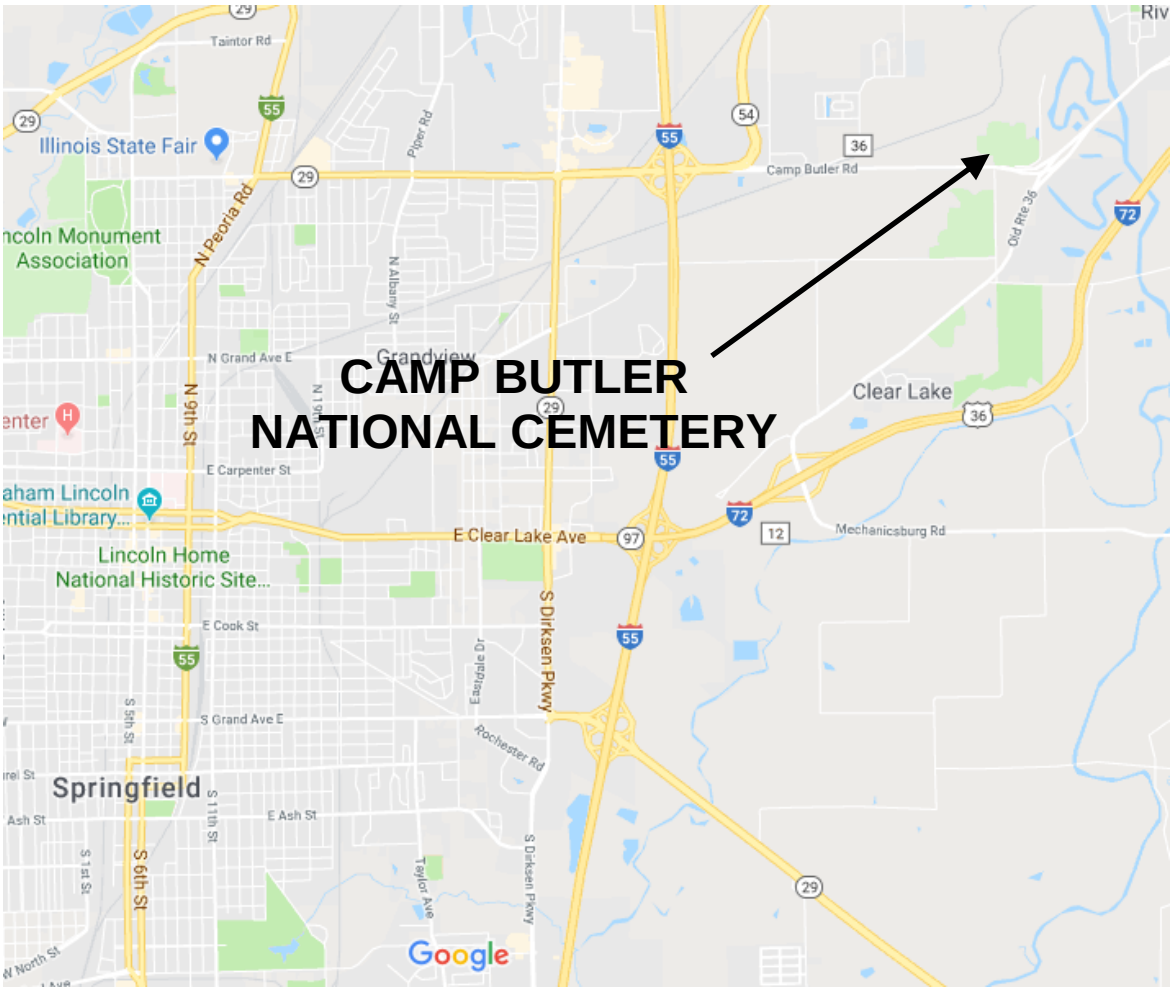

FIGURE 1
VICINITY LOCATION MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED CAMP BUTLER
NATIONAL CEMETERY EXPANSION
SPRINGFIELD, ILLINOIS

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON D.C.

TTL PROJECT NO.
1746803

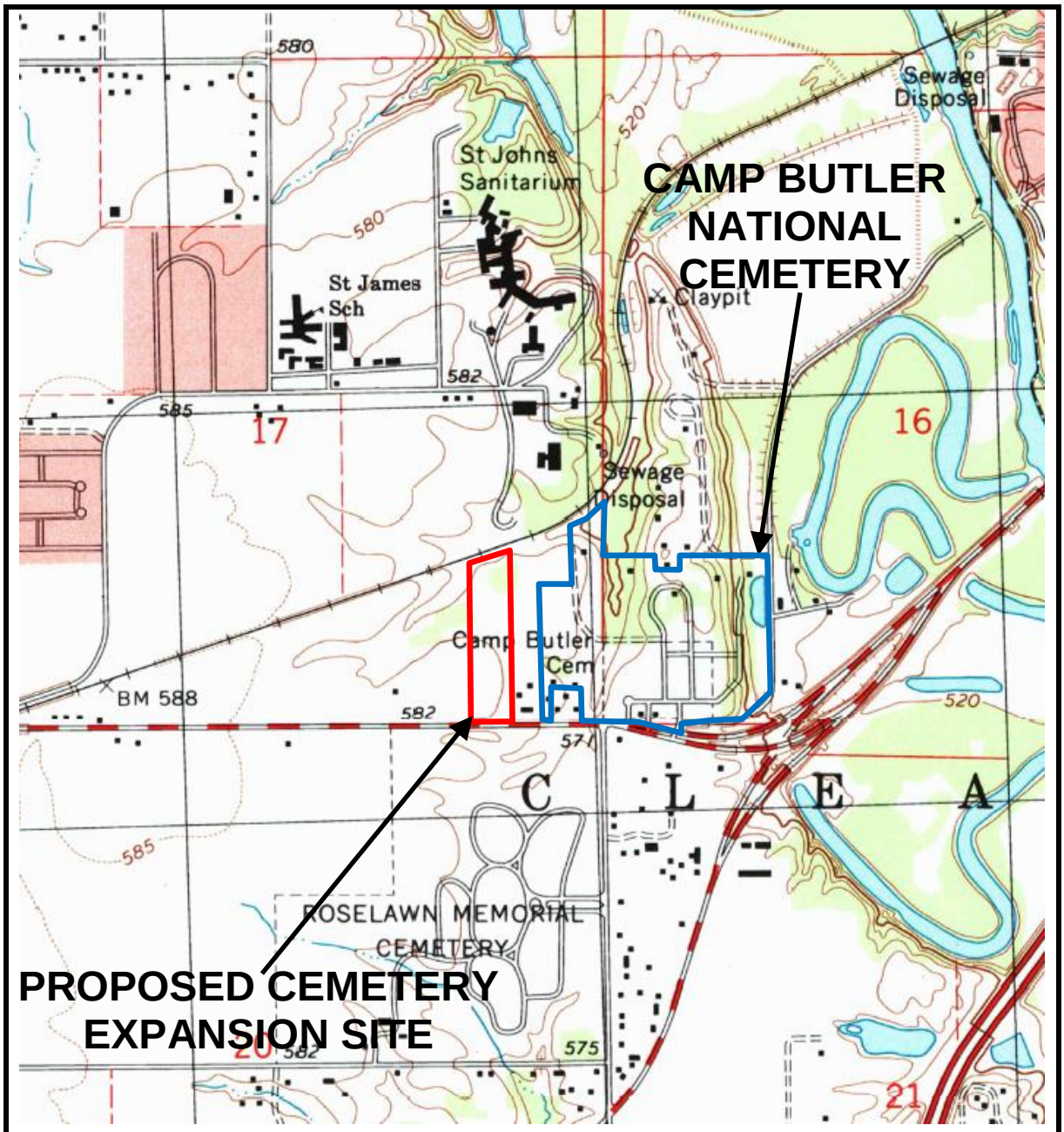

FIGURE 2
TOPOGRAPHIC LOCATION MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED CAMP BUTLER
NATIONAL CEMETERY EXPANSION
SPRINGFIELD, ILLINOIS

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON D.C.

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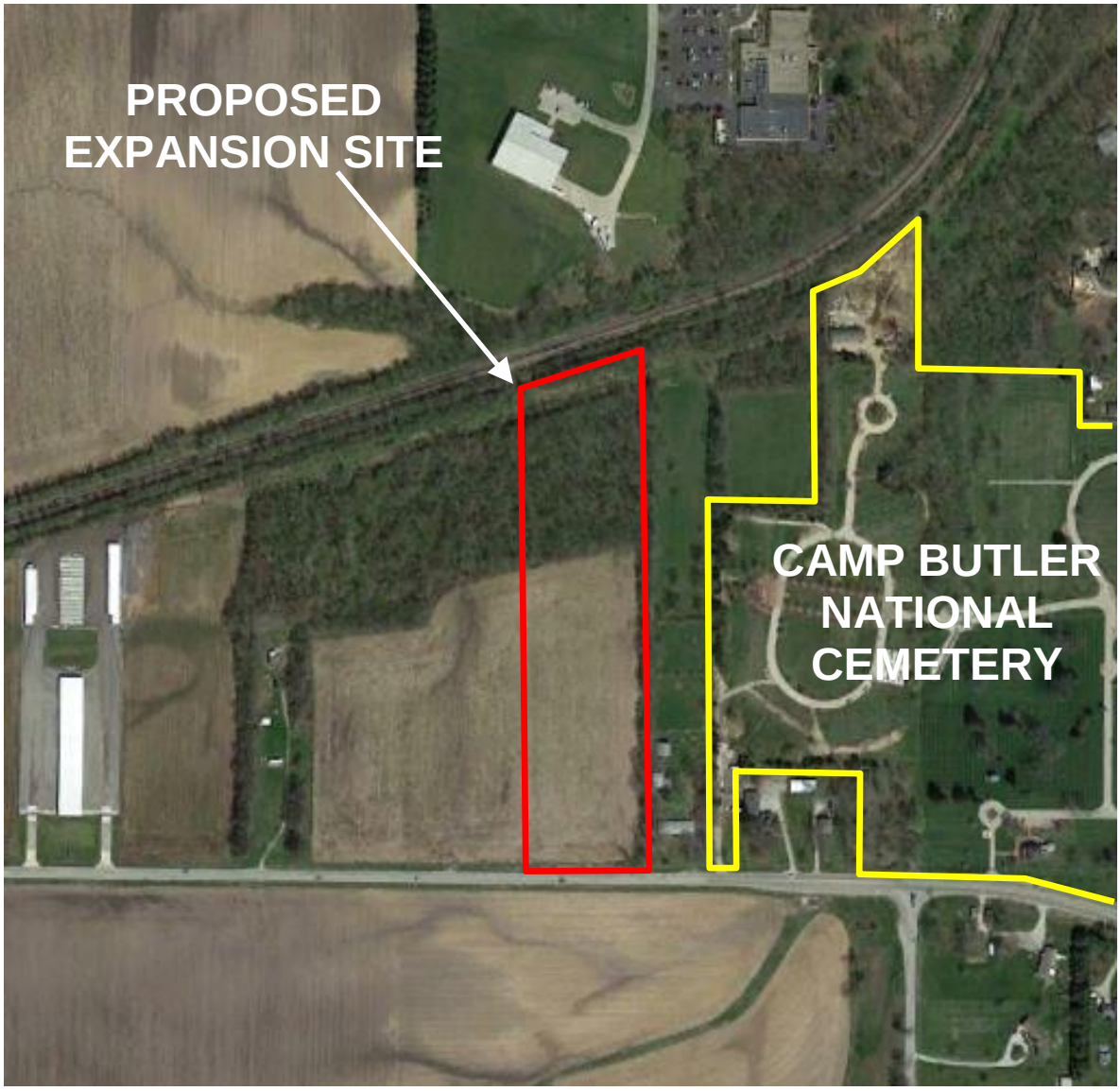

FIGURE 3
AERIAL LOCATION MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED CAMP BUTLER
NATIONAL CEMETERY EXPANSION
SPRINGFIELD, ILLINOIS

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON D.C.

TTL PROJECT NO.
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SECTION 2: DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1 Introduction

This Section provides the reader with necessary information regarding the Proposed Action and its alternatives, including those that VA initially considered, but eliminated, and the reasons for eliminating them. The screening criteria and process developed and applied by VA to hone the number of reasonable alternatives are described, providing the reader with an understanding of VA's rationale in ultimately retaining the Proposed Action Alternative, that best meets VA's purpose of and need for the Proposed Action, for analysis.

2.2 Proposed Action

VA's Proposed Action is to acquire land near the existing CBNC for the future expansion of the cemetery. The future CBNC expansion would provide VA additional capacity to continue providing National Cemetery burial benefits to the regional Veteran community.

VA estimates adequate space remains for burials on current CBNC land through 2029 before additional land is needed. VA would acquire the Site in 2019 and would hold it until such date when the expansion of the CBNC becomes necessary. It is anticipated that cemetery expansion design and initial development would begin in approximately 5 to 10 years. Design details of the proposed CBNC expansion do not exist at this time; however future gravesite expansion onto the Site would be designed to be similar in appearance to the existing grounds of the CBNC.

VA would follow the NCA *Facilities Design Guide* in the CBNC expansion design. Based on the *Design Guide*, the proposed CBNC expansion would generally include the following components:

- A road connecting to the existing CBNC through the northern portion of the parcel separating the Site from the CBNC; possibly through the existing utility easement. Roadways would be approximately 28 feet wide and would wind throughout the cemetery in harmony with the natural grade and environmental features of the land. Roadways would loop back around the property to maintain a complete, simple traffic pattern around the cemetery. All of the roadways would have a speed limit of 15 miles per hour (mph).

- Existing committal shelters at the CBNC would be utilized for ceremonies (there are no grave-side ceremonies at National Cemeteries). These shelters are located where there are scenic views, maximum weather protection, and minimal potential for noise disruption.

- The acquired land would be developed in phases. Each phase would develop enough gravesites and columbarium niches as needed to accommodate approximately 5 to 10 years of burial demand. Cremation sites, casket gravesites, and columbaria would be

developed in each subsequent phase. The size of each phase, and the total number of phases, is currently unknown.

- Environmentally constrained areas, such as culturally sensitive areas, and areas that are otherwise difficult to develop would be left undeveloped and remain as scenic locations at the cemetery. The utilized portions of the Site would be developed to within 20 feet of the Site boundaries.

- The standard for NCA design is to achieve on-site cut-and-fill soil balance as much as practical. Proposed development would primarily be located in relatively level areas, following natural contours to the extent possible. Areas may be minimally leveled to develop a consistent grade with each phase. Development would include the installation of grave sites, which would consist of gravel base, drainage piping, and pre-placed concrete vault/crypt system. Approximately 20-22 inches of soil would be placed on top of each vault/crypt. This design would provide the most space-efficient option. Each grave site would be marked with a small, upright marble headstone.

- Utilities, including potable and irrigation water, electric, and other supporting infrastructure would be extended throughout the site, as required.

Prior to construction, VA would obtain all applicable Federal, State, and local permits for the proposed cemetery development from appropriate government authorities. VA would avoid any significant on-site environmental resources through sensitive site design, including avoidance of significant cultural and natural resources.

2.3 Alternatives Analysis

The NEPA, CEQ Regulations, and 38 CFR Part 26 require reasonable alternatives to be explored and objectively evaluated. Alternatives that are eliminated from detailed study must be identified along with a brief discussion of the reasons for eliminating them. For purposes of analysis, an alternative was considered “reasonable” only if it would enable VA to accomplish the primary mission of providing a suitable expanded cemetery site that meets the purpose of and need for the Proposed Action, including availability at a price consistent with the fair market value based on an independent appraisal. “Unreasonable” alternatives would not enable VA to meet the purpose of and need for the Proposed Action.

2.3.1 Alternatives Development

VA estimates adequate space remains for burials on current CBNC land through 2029 before additional land is needed to continue providing National Cemetery burial benefits for area Veterans.

After identifying that additional land for the CBNC would be required to continue providing National Cemetery burial benefits to the regional Veteran community, VA advertised (via Solicitation No.: 36C10F18Q067 on June 20, 2018) their need for between 6 and 100 acres of developable land located within a delineated area in the vicinity of the CBNC. VA received three land offers,

including the Site. The remaining two offers were greater than one mile from the CBNC and determined not to be viable alternatives based their distance from the CBNC.
The NCA Final Land Acquisition Fact Sheet, dated April 2012, states adjacent/contiguous property is considered to be the first and best option for cemetery expansion. National Cemetery expansion onto adjacent land is the most cost effective and operationally efficient manner to expand an existing National Cemetery. Doing so promotes efficiencies and allows the new gravesite areas to be operated by the same staff that operates the existing grounds, with no need for remote staff, remote buildings, and remote equipment. It also eliminates potential visitor directional and wayfinding confusion that can occur with a remotely located property.

Additionally, the regional Veteran community has indicated that they strongly prefer and support the expansion of CBNC onto adjacent/contiguous property rather than expanding the National Cemetery elsewhere on remote “annex” land. As such, VA would only consider the closure of the CBNC and the acquisition and construction of a new CBNC Annex in a new remote location once all opportunities for the acquisition of adjacent/contiguous land have been exhausted.

The Site, approximately 9.6 acres of land located approximately 170 feet west of the CBNC, is available for sale and has been offered to VA by the current owner at fair market value. The parcel separating the Site from the CBNC is not currently available to VA; however, the current owners of the parcel are in support of the CBNC expansion and have agreed, in principle, to allowing VA to construct an access road across the northern portion of the parcel separating the Site from the CBNC.

After identifying the opportunity to acquire additional land very near the existing CBNC and the likely ability to connect the Site to the CBNC through a private access road, VA concluded that acquiring the Site would secure land necessary to meet its long-term cemetery needs. No other sites adjacent to the CBNC were offered to VA or identified as available for acquisition.

2.3.2 Evaluated Alternatives

This EA examines in-depth two alternatives, the Proposed Action and the No Action Alternative, defined as follows:

Proposed Action

VA would acquire approximately 9.6 acres of unimproved land approximately 170 feet west (with intervening privately owned land) of the CBNC, mostly for future expansion of the CBNC. After acquisition, the Site would remain unimproved agricultural land (under a lease agreement) until such date when the expansion of the CBNC becomes necessary. It is anticipated that cemetery design and initial development would begin in approximately 5 to 10 years. The majority of the Site would be developed with the expanded cemetery. The Proposed Action would be implemented as described in Section 2.2.

The Proposed Action effectively provides additional land necessary to meet the regional cemetery requirements of VA.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented. Veterans and their families residing in central Illinois would continue to use the CBNC until space is no longer available. In the future, VA would likely seek other land to expand the CBNC, but may not be able to acquire land contiguous with or near the existing CBNC. The Site likely would remain unimproved, mostly agricultural land.

While the No Action Alternative would not satisfy the purpose of or need for the Proposed Action, this alternative was retained to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required under the CEQ Regulations (40 CFR Part 1502.14). The No Action Alternative reflects the *status quo* and serves as a benchmark against which the effects of the Proposed Action can be evaluated.

2.3.3 Alternatives Eliminated From Detailed Consideration

As described in Section 2.3.1, VA was presented the opportunity to acquire land located approximately 170 feet west of the existing CBNC, that could likely be connected to the CBNC through a private access road, for future expansion of the cemetery. VA concluded that acquiring the Site in the short-term, while available, would secure the land necessary to meet its long-term cemetery needs. VA was offered two other parcels of land for the cemetery expansion; however, they were greater than one mile from the CBNC and determined not to be viable alternatives based their distance from the CBNC. No other land proximal to CBNC was offered to VA or identified as available for acquisition.

Closure of the CBNC when it reaches its capacity and acquisition and development of a new CBNC Annex at a remote location would not be cost effective or operationally efficient, would create way finding confusion for visitors, and would only be considered once all opportunities for cemetery expansion on adjacent land have been exhausted.

SECTION 3: AFFECTED ENVIRONMENT & ENVIRONMENTAL CONSEQUENCES

3.1 Introduction

This Section describes the baseline (existing) physical, environmental, cultural, and socioeconomic conditions of the proposed CBNC expansion Site (see Figures 1-3) and its general vicinity [i.e., the Proposed Action's Region of Influence (ROI)], with emphasis on those resources potentially affected by the Proposed Action. Appendix C provides photographs, with captions, of the Site and its vicinity. Under each resource area (Sections 3.2 through 3.16), the potential direct and indirect effects of the Proposed Action and the No Action Alternative are identified. Potential cumulative impacts are discussed in Section 3.17.

In this EA, impacts are identified as either significant, less than significant (i.e., common impacts that would not be of the context or intensity to be considered significant under the NEPA or CEQ Regulations), or no/negligible impact. As used in this EA, the terms "effects" and "impacts" are synonymous. Where appropriate and clearly discernible, each impact is identified as either adverse or beneficial.

The CEQ Regulations specify that in determining the significance of effects, consideration must be given to both "*context*" and "*intensity*" (40 CFR 1508.27):

Context refers to the significance of an effect to society as a whole (human and national), to an affected region, to affected interests, or to just the locality. Significance varies with the setting of the proposed action.

Intensity refers to the magnitude or severity of the effect, whether it is beneficial or adverse.

In this EA, the significance of potential direct, indirect, and cumulative effects has been determined through a systematic evaluation of each considered alternative in terms of its effects on each individual environmental resource component.

Resource areas considered in this EA are as follows:

- *Aesthetics*
- *Air Quality*
- *Cultural Resources*
- *Geology and Soils*
- *Hydrology and Water Quality*
- *Wildlife and Habitat*
- *Noise*
- *Land Use*
- *Floodplains, Wetlands, and Coastal Zone Management*
- *Socioeconomics*
- *Community Services*
- *Solid and Hazardous Materials*
- *Transportation and Parking*
- *Utilities*
- *Environmental Justice*

3.2 Aesthetics

The approximately 9.6-acre, mostly level Site is situated in a rural area in Clear Lake Township, approximately six miles northeast of the center of Springfield, Illinois, in the central portion of Sangamon County, Illinois (Figures 1-3). The Site is located approximately 170 feet west of the CBNC. The northern approximately 3.5-acre portion of the Site is unimproved, wooded land with an overhead electrical easement covering approximately 75 feet along the northern boundary. The southern approximately 6.1-acre portion of the site is cultivated agricultural land. The Site features are depicted on Figure 3.

The area located north of the Site across a railroad right-of-way, is occupied by unimproved land and Hospital Sisters Health System. The area located to the east of the Site is mostly unimproved grassy land with a residence and associated outbuildings on its southern end, near Camp Butler Road. The area located to the south of the Site, across Camp Butler Road, is unimproved, cultivated agricultural land. The area located to the west of the Site is unimproved, partially wooded and partially cultivated agricultural land. The surrounding land uses are depicted on Figure 3.

3.2.1 Effects of the Proposed Action

After VA's acquisition, the Site would remain in its current configuration until such a time that VA is ready to expand the CBNC (5 to 10 years). The continued use of the Site as unimproved agricultural land while owned by VA would result in no aesthetic impacts.

Future expansion of the CBNC on the Site would produce visual changes, including the installation of roads, maintained grassy burial areas, and possibly one or two small, single-story structures. The expanded cemetery design has not been initiated, but it is anticipated that the cemetery expansion would cover the majority of the Site and would be visually consistent with the nearby existing CBNC. VA would develop the Site in concert with the Site's natural topography and features. No significant grade changes are anticipated. Landscaping would be installed/maintained along the southeastern Site boundary to reduce visual impacts of the cemetery development on the adjacent residence.

The cemetery would be designed to comply, to the extent practicable, with the Sangamon County Development Standards. Given that the proposed cemetery would be designed to blend with the existing topography and landscape and would be visually consistent with the existing CBNC, no significant aesthetics effects would occur.

3.2.2 Effects of the No Action Alternative

Under the No Action Alternative, no aesthetics impacts would result from VA's actions. The likely continued use of the Site as unimproved agricultural land would result in no aesthetic impacts.

3.3 Air Quality

3.3.1 Ambient Air Quality

The ambient air quality in an area can be characterized in terms of whether or not it complies with the primary and secondary National Ambient Air Quality Standards (NAAQS). The Clean Air Act, as amended (CAA and CAAA) requires the USEPA to set NAAQS for pollutants considered harmful to public health and the environment. NAAQS are provided for the principal pollutants, called “criteria pollutants”, which include carbon monoxide, lead, nitrogen oxides, ozone, particulate matter, and sulfur dioxide.

Areas are designated by the USEPA as “attainment”, “non-attainment”, “maintenance”, or “unclassified” with respect to the NAAQS. Regions in compliance with the standards are designated as “attainment” areas. In areas where the applicable NAAQS are not being met, a “non-attainment” status is designated. Areas that have been classified as "non-attainment", but are now in compliance can be re-designated "maintenance" status if the state completes an air quality planning process for the area.

According to the USEPA Green Book (December 2018), Sangamon County is currently designated as a full-attainment area.

3.3.2 State and Local Regulations

The Illinois Environmental Protection Agency (IEPA) Bureau of Air coordinates State-wide air compliance and enforcement activities through Title II (Air Pollution) of the Illinois Environmental Protection Act.

Springfield, Clear Lake Township, and Sangamon County do not maintain air quality ordinances.

3.3.3 Sensitive Receptors

With the exception of the residence adjoining to the east of the southern portion of the Site, there are no sensitive air quality receptors in the vicinity of the Site.

3.3.4 Effects of the Proposed Action

Air emissions generated from the Proposed Action would be expected to have less-than-significant direct and indirect, short-term and long-term impacts to the air quality environment around the Site. No change to air quality is anticipated during the initial continued use of the Site as unimproved agricultural land. Short-term increased air emission levels would occur as a result of the construction of each expansion area of the cemetery. Long-term emissions would occur during the operation of the expanded cemetery.

Construction activities would be performed in accordance with Federal and State air quality requirements. Construction-related emissions are generally short-term, but may still have adverse impacts on air quality, primarily due to the production of dust. Dust can result from a variety of activities, including excavation, grading, and vehicle travel on paved and unpaved

surfaces. Dust from construction can lead to adverse health effects and nuisance concerns, such as reduced visibility on nearby roadways. The amount of dust is dependent on the intensity of the activity, soil type and conditions, wind speed, and dust suppression activities used. Implementing dust control measures (BMPs) significantly reduces dust emissions from construction. Construction-related emissions also include the exhaust from the operation of construction equipment, including diesel particulate matter. The use of newer construction equipment with emissions controls and minimizing the time that the equipment is idling (BMPs) reduce construction equipment exhaust emissions. Implementation of BMPs, discussed in Section 5, would minimize these anticipated less-than-significant adverse, short-term, construction-related, air quality impacts.

In the future, when the Site would be utilized to expand the CBNC, vehicle trips to the Site associated with interments would likely be similar to current conditions at the existing CBNC; the rate of interments per week is not anticipated to increase as a result of the Proposed Action. As additional areas of the CBNC are developed at the Site, the number of visitors to the CBNC would increase; however, the increased number of vehicle trips associated with visitors would be minor. Increased vehicle air emissions associated with the expanded cemetery would be less-than-significant.

3.3.5 Effects of the No Action Alternative

Under the No Action Alternative, no air quality impacts associated with VA's Proposed Action would result. The likely continued use of the Site as unimproved agricultural land would result in no/negligible air quality impacts.

3.4 Cultural Resources

The CBNC and the approximately 9.6-acre Site both occupy a portion of the former Camp Butler military training camp. The camp was designed to train Illinois Union troops for the Civil War, but it also became a prisoner-of-war camp in 1862, when Confederate soldiers were taken prisoner at the surrender of Fort Donelson in Tennessee. Also in 1862, an area at the camp was set aside for the burial of Confederate prisoners of war who died at the camp as a result of rampant smallpox and other diseases. Ultimately, the cemetery (within the current CBNC grounds) became the final resting place for Union soldiers from Illinois as well. The CBNC was entered into the National Register of Historic Places (NRHP) in 1997.

The Site and area immediately adjoining to the east were used as barracks associated with Camp Butler from 1862 to 1866, when Camp Butler was closed. After the closure of Camp Butler, the Site and surrounding areas were returned to private landowners to be used for agricultural purposes. The Site has been used for agricultural purposes since that time.

Row 10 Historic Preservation Solutions (Row 10) conducted an Initial Cultural Resources Impact Prediction (ICRIP) for the Site on behalf of VA in November 2018. The ICRIP included a records and literature search of Illinois State Historic Preservation Office (SHPO) files and NRHP data, and a pedestrian survey of the Site by an architectural historian. No previous cultural resource surveys of the Site were identified. The ICRIP identified the CBNC has been listed on the NRHP. No other NRHP-listed or eligible for listing properties were identified in the immediate Site area.

The ICRIP indicated the Site does not possess any buildings, objects, or structures that are listed or eligible for listing in the NRHP.

The ICRIP indicated that preliminary historic research and previous archaeological investigation in the area suggest the Site may contain deposits related to the historic Camp Butler military installation. The ICRIP stated that when cemetery design and construction plans for the Site are developed, additional archaeological identification, evaluation, and consultation efforts will be necessary.

3.4.1 Effects of the Proposed Action

After VA's acquisition, the Site would remain in its current configuration until such a time that VA is ready to expand the CBNC. The continued use of the Site as unimproved agricultural land while owned by VA would result in no cultural resources impacts.

In November 2018, VA submitted a letter to SHPO detailing the cultural resources identification efforts taken to date, and requesting SHPO review and concurrence that VA's proposed acquisition of the Site would have no effect on historic properties. In a letter dated December 24, 2018, SHPO concurred with VA's determination that the Site acquisition by VA would have no adverse effects on historic properties.

The future expansion of the CBNC at the Site could have direct and indirect impacts on yet identified archaeological resources at the Site associated with former Camp Butler. Prior to completing the expanded cemetery design, a ground-disturbing, archaeological investigation of the Site would be conducted in consultation with SHPO. VA would formally determine the eligibility of any identified historic features for listing on the NRHP and would determine the potential adverse effects of the proposed cemetery expansion development in consultation with SHPO. If historic features eligible for listing on the NRHP are identified that would be adversely affected by the proposed CBNC expansion, VA would enter into a Memorandum of Agreement (MOA) with the SHPO, Advisory Council on Historic Preservation (ACHP), and other interested parties under Section 106 of the NHPA to mitigate any adverse effects. With the completion of these NHPA mitigation measures, cultural resources impacts would be minimized or avoided.

The Proposed Action would have indirect impacts on the NRHP-listed CBNC. However, the expansion of the CBNC onto the Site would be consistent with the existing cemetery. The impacts resulting from the expansion of the CBNC at the Site would be less-than-significant.

3.4.2 Effects of the No Action Alternative

Under the No Action Alternative, no cultural resources impacts by VA would occur. The likely continued use of the Site as unimproved agricultural land would result in no/negligible cultural resource impacts.

3.5 Geology and Soils

A review of the Springfield East, Illinois United States Geological Survey (USGS) Topographic Quadrangle (dated 1998) indicates that surficial topography at the Site is relatively level [elevation

approximately 580 feet above mean sea level (amsl)]. The Site area gently slopes to the east towards the Sangamon River, located approximately 4,500 feet east of the Site (Figure 2).

According to A Tapestry of Time and Terrain, published by the USGS and dated 2000, Sangamon County is located in the Till Plains physiographic section of the Central Lowland physiographic province in central Illinois. The Till Plains consist of silty, sandy, and clayey till with intercalated sand and gravel. This region is underlain by the Shelburn-Patoka bedrock formations, which are dominated by sandstone with widespread beds of limestone, black shale, and coal, generally situated approximately 500 feet below grade.

According to the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey, the Site contains three soil type identified as Elco silt loam, 5 to 10 percent slopes, eroded (northern boundary); Rozetta silt loam, 2 to 5 percent slopes (northern portion and southeastern corner); and Keomah silt loam, 0 to 2 percent slopes (central and southern portions). These soils are characterized as somewhat poorly drained to well-drained with varying permeability. Refer to Figure 4.

TTL Associates, Inc. (TTL) completed a geotechnical subsurface investigation of the Site in November 2018. The geotechnical investigation found the Site consists of predominantly clay and silty clay with some sand to at least 10 feet below ground surface (bgs), the maximum extent investigated.

According to the Karst Terrains and Carbonate Rocks of Illinois, published by the Illinois State Geological Survey (ISGS), the Site vicinity is not located in an area with significant karst potential. In addition, the Site is not located in an area with known fault lines or significant potential for earthquakes (ISGS 1997).

The Springfield – Sangamon County Regional Planning Commission (SSCRPC) stated that the Site and CBNC are located in an area that has been undermined for coal. According to the ISGS ILMINES internet application, the Site and CBNC are located over the Peabody Coal Company No. 59 Mine 37 that operated from 1884 to 1951. The coal extracted was situated approximately 235 bgs and averaged 6 feet in thickness. An air shaft for the mine is depicted in the northeastern portion of the CBNC. No mine entrances, exits or air shafts were depicted at or immediately adjacent to the Site.

3.5.1 Prime and Unique Farmland Soils

Prime and Unique Farmlands are regulated in accordance with the Farmland Protection Policy Act (FPPA) to ensure preservation of agricultural lands that are of statewide or local importance. Soils designated as prime farmland are capable of producing high yields of various crops when managed using modern farming methods. Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, and without intolerable soil erosion. Unique farmlands are also capable of sustaining high crop yields and have special combinations of favorable soil and climate characteristics that support specific high-value foods or crops.

According to the USDA NRCS Web Soil Survey, all of the Site soils were identified as farmland of statewide importance or prime farmland.

3.5.2 Effects of the Proposed Action

The Site would continue to be unimproved, mostly agricultural land after VA's acquisition (under a lease agreement) until expansion of the CBNC is required. The initial continued use of the Site as unimproved agricultural land would result in no/negligible geology and soils impacts.

The expansion of the CBNC at the Site is anticipated to result in less-than-significant impacts to geology and soils. No significant changes to topography or drainage are expected at the Site. The proposed cemetery expansion would be designed in concert with the natural topography and current drainage patterns. Limited paved areas would be designed to drain to a suitable, on-site, properly engineered and designed, stormwater management system.

Cemetery construction activities would disturb the soil surface and compact the soil. The soil would then be susceptible to erosion by wind and surface runoff. Exposure of the soils during construction has the potential to result in increased sedimentation to existing stormwater management systems and offsite discharges of sediment-laden runoff. However, such potential adverse erosion and sedimentation (E&S) effects would be prevented through utilization of appropriate BMPs as described in Section 5 and adherence to the terms of approved IEPA National Pollutant Discharge Elimination System (NPDES) and land disturbance permits, including the development and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP).

No long-term E&S impacts would be anticipated due to the nature of the Proposed Action. No long-term soil erosion impacts would occur as a result of increased impervious surfaces onsite; there would be limited impervious surfaces associated with the cemetery development and long-term soil erosion impact would be managed by maintaining appropriately designed stormwater management features associated with the proposed cemetery.

The entire Site contains prime farmland and farmland of statewide importance soils. The majority of the Site is actively farmed and would remain as such under a lease agreement until expansion of the cemetery is necessary. The proposed future cemetery development would irreversibly convert the Site into nonagricultural use. As such, the future cemetery expansion would be subject to the FPPA requirements. VA would be required to complete, in conjunction with the NRCS, a Farmland Conversion Impact Rating (Form AD-1006). This process evaluates the relative value of the Site as farmland compared to other farmland in the area and assesses the Site by examining the Site, surrounding areas, and the programs and policies of the State or local government agency. Based on the small amount of active farmland that would be lost (approximately 6.1 acres) and the large amount of farmland in the Site area, the proposed cemetery development at the Site would have a less-than-significant impact on farmland soils.

No active faults are known to extend through the subsurface geology in the Site area. As such, no significant impacts associated with seismic hazards are identified. No significant impacts to mineral resources are anticipated, as the Proposed Action would not involve the commercial

extraction of mineral resources, nor affect mineral resources considered important on a local, State, national, or global basis.

3.5.3 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to soils, topography, or geology by VA would occur. The likely continued use of the Site as unimproved agricultural land would result in no/negligible soils, topography, or geology impacts.

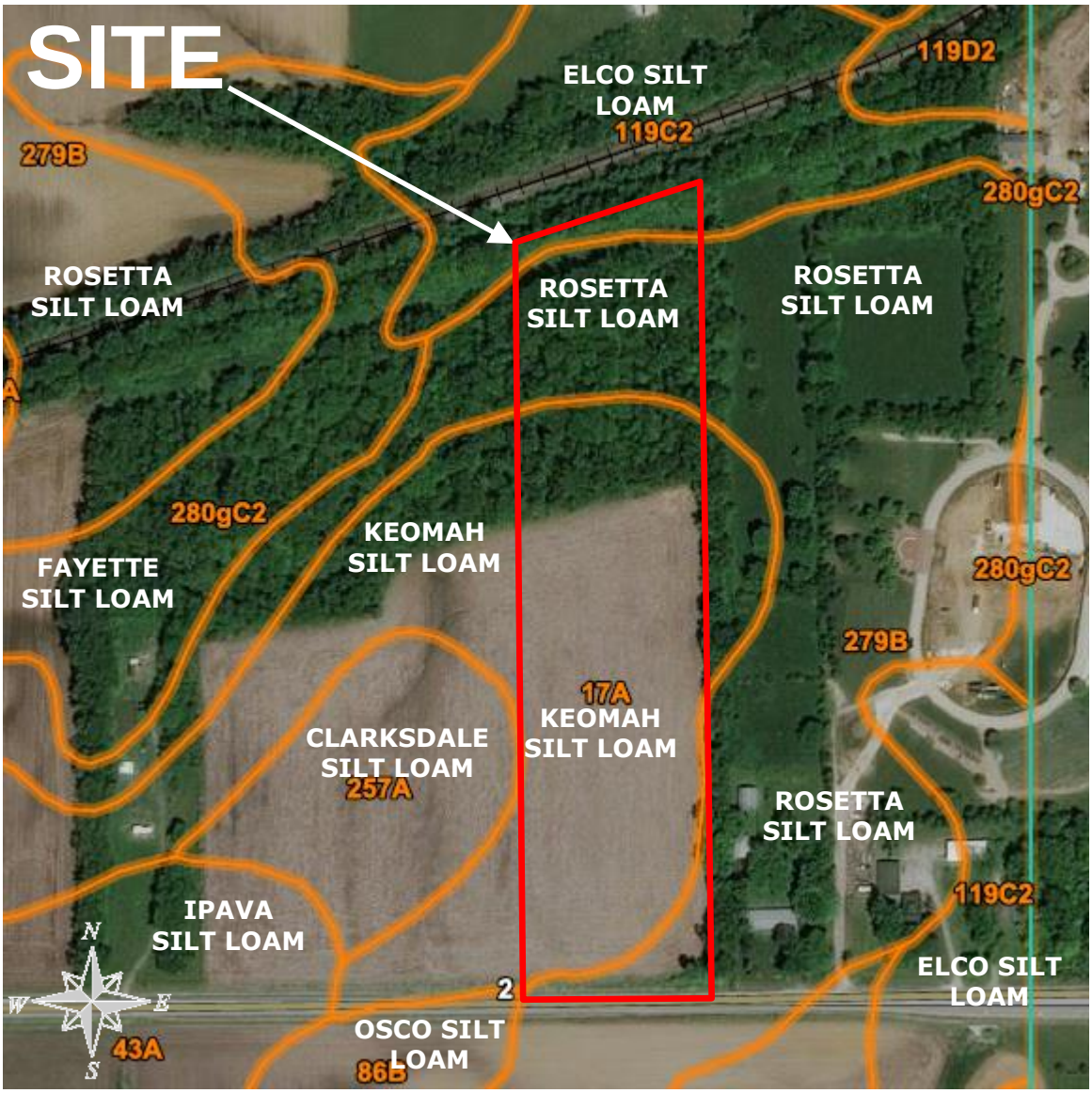

FIGURE 4
SOILS MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED CAMP BUTLER
NATIONAL CEMETERY EXPANSION
SPRINGFIELD, ILLINOIS

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, D.C.

TTL PROJECT NO.
1746803

3.6 Hydrology and Water Quality

3.6.1 Surface Waters

The Site is located in the Sangamon River watershed. No surface waters are located on the Site or the adjacent properties. The nearest surface water is a stormwater retention pond located on the eastern portion of the existing CBNC, approximately 1,900 feet from the Site. Farther east are oxbows related to the Sangamon River and the Sangamon River itself, located approximately 4,500 feet east of the Site. Figure 2 depicts the Site on the USGS topographic map and illustrates the locations of area surface waters.

3.6.2 Groundwater

According to the Groundwater Atlas of the United States, the Site is underlain by surficial sand and gravel aquifers in proximity to the Sangamon River and Central Lowland Pennsylvanian aquifer systems.

Springfield City Water, Light and Power provides potable water to the Site vicinity. However, water wells are located in the general vicinity of the Site, including at the east adjoining residential property and the CBNC (for fire suppression). These water wells are 116 feet bgs and 43 feet bgs, respectively. Groundwater was not encountered during TTL's geotechnical investigation of the Site.

3.6.3 Effects of the Proposed Action

The Site would continue to be unimproved agricultural land after VA's acquisition until expansion of the CBNC is required. The initial continued use of the Site as unimproved agricultural land would result in no/negligible hydrology and water quality impacts.

The future development of the expanded cemetery at the Site would not result in significant impacts to surface waters, provided that the BMPs described in Section 5 are implemented. These BMPs would control construction-related impacts of soil erosion and sedimentation and would provide proper stormwater management following the development of the cemetery.

It is not anticipated that groundwater would be encountered or adversely impacted by the proposed cemetery expansion. Based on the geotechnical investigation, groundwater is greater than 10 feet bgs.

Based on standard modern burial practices, it is unlikely that toxic embalming fluid or other decomposition byproducts would be released into the soil and/or groundwater. The standard NCA design incorporates (for full casket burials) sub-surface concrete crypts, an entire section of which is installed during site construction, above the water table. Using this technique, the caskets are not buried directly in the soil, rather they are set in a pre-placed concrete crypt (established turf and soil temporarily removed, crypt lid removed, casket placed, followed by the reverse process to complete). Modern embalming fluids are markedly less toxic as the primary active ingredients are no longer arsenic based. Modern embalming fluids are commonly biodegradable. Additionally, as selection of either cremains interment or columbaria placement

increases, and green burials increase, the potential for soil or groundwater contamination commensurately decreases as no embalming fluids are used.

3.6.4 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to hydrology or water quality by VA would occur. The likely continued use of the Site as unimproved agricultural land would result in no/negligible hydrology or water quality impacts.

3.7 Wildlife and Habitat

3.7.1 Vegetation and Wildlife

The northern approximately 3.5-acre portion of the Site is wooded land with an overhead electrical easement covering approximately 75 feet along the northern boundary. The southern approximately 6.1-acre portion of the Site is cultivated agricultural land. Properties surrounding the Site consist of limited wooded areas to the north along railroad tracks, unimproved grassy land and a residence adjoining to the east with the CBNC farther to the east, and unimproved, cultivated agricultural land to the south and west with a wooded area located in the northern portion of the westerly adjacent property. Vegetative communities on the Site and surrounding area support wildlife species associated with rural Sangamon County.

SSCRPC stated that the Site and CBNC are located in an area identified as Grade C Mixed Timber (mid-successional or moderately to heavily disturbed communities) in the Inventory of Sangamon County Natural Areas.

3.7.2 Threatened and Endangered Species

As part of the preparation of this EA, the US Fish and Wildlife Service (USFWS) and the Illinois Department of Natural Resources (IDNR) were contacted to identify the potential for the presence of State or Federally-listed threatened or endangered species on or in the vicinity of the Site.

The USFWS did not respond to this request. However, an Official Species List for the Site area was obtained from the USFWS Information for Planning and Conservation (IPaC) internet website (https://ecos.fws.gov/ipac/). According to the USFWS IPaC internet application, three Federally-protected wildlife species were identified for the Site vicinity: Indiana Bat, Northern Long-Eared Bat, and Eastern Prairie Fringed Orchid. The IPaC report did not identify critical habitat for these protected species at the Site.

The northern, wooded portion of the Site may support the presence of Indiana and Northern Long-Eared Bats as summer roosting and foraging habitat. However, they are not likely to be present on the actively farmed southern portion of the Site due to their habitat requirements for wooded areas. The Eastern Prairie Fringed Orchid is typically associated with mesic (moist) to wet prairies and wet sedge meadows. This habitat is not present at the Site; therefore, this plant species is not likely to be present at the Site.

The USFWS IPaC report also identified one protected migratory bird species (Red-Headed Woodpecker) that may use the Site area for breeding. Red-Headed Woodpeckers prefer to nest in open woodlands and cultivated areas like parks. The northern portion of the Site provides marginal habitat for Red-Headed Woodpecker nesting. The USFWS IPaC indicated that Red-Headed Woodpeckers breed between May 10 and September 10 and are most likely to nest in central Illinois in mid-June.

IDNR stated that the State-listed threatened Franklin's Ground Squirrel has been documented within one mile of the Site and recommended that potential impacts to this species be evaluated as part of the NEPA process. Franklin's Ground Squirrels require tall-grass prairie habitat, which is not located at the Site; therefore, these squirrels are unlikely to be present at the Site.

3.7.3 Effects of the Proposed Action

The Site would continue to be unimproved, mostly agricultural land after VA's acquisition until expansion of the CBNC is necessary. The initial continued use of the Site as unimproved agricultural land would result in no/negligible wildlife and habitat impacts.

The development of the cemetery at the Site is not likely to have adverse effects on State or Federally-listed protected species or their critical habitats, provided that seasonal tree clearing in the northern portion of the Site is conducted to prevent impacts to Indiana Bats and Northern Long-Eared Bats, who may use the Site for summer roosting and foraging. Seasonal tree clearing (October 15 to March 31), while these bat species hibernate in off-site caves, would be conducted as part of the Proposed Action in consultation with the USFWS, as required. Seasonal tree clearing during this timeframe would occur outside of the Red-Headed Woodpecker nesting season and would prevent impacts to the birds. As such, wildlife and habitat impacts associated with the Proposed Action would be less than significant.

3.7.4 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA would occur. No impacts to vegetation or wildlife habitat would occur as a result of VA's actions. The likely continued use of the Site as unimproved agricultural land would result in no/negligible vegetation or wildlife habitat impacts.

3.8 Noise

The Site is located in a mostly undeveloped, rural area with no significant noise generation sources. Limited noise is associated with vehicle traffic along Camp Butler Road and intermittent noise is associated with the railroad line along the northern Site boundary. In addition, ceremonial gun salutes associated with interments at the CBNC are audible at the Site and surrounding area. The short bursts of noise from the salutes are intermittent and only occur during weekday business hours. No other notable noise-generating sources are present in the immediate vicinity of the Site.

3.8.1 Sensitive Receptors

Sensitive noise receptors in the vicinity of the Site include the easterly adjacent residence and other residences farther east, the Hospital Sisters Health System located approximately 650 feet to the northeast, and the CBNC located approximately 170 feet to the east. No other sensitive noise receptors, such as residential areas or schools, are located in the vicinity of the Site.

3.8.2 Effects of the Proposed Action

Based on the proposed initial continued use of the Site as unimproved agricultural land and the future use of the Site as a cemetery, no significant long-term noise impacts would be anticipated. The Proposed Action would have future short-term impacts to the existing noise environment during the cemetery expansion construction activities. Noise generating sources during construction activities would be associated primarily with standard construction equipment and construction equipment transportation. These increased noise levels could directly affect the neighboring area.

Construction activities generate noise by their very nature and are highly variable, depending on the type, number, and operating schedules of equipment. Construction projects are usually executed in stages, each having its own combination of equipment and noise characteristics and magnitudes. Construction activities are expected to be typical of other similar construction projects and would include mobilization, site preparation, excavation, placing foundations, utility development, heavy equipment movement, and paving roadways and parking areas.

The most prevalent noise source at typical construction sites is the internal combustion engine. General construction equipment using engines includes, but is not limited to: heavy, medium, and light equipment such as excavators; roller compactors; front-end loaders; bulldozers; graders; backhoes; dump trucks; water trucks; concrete trucks; pump trucks; utility trucks; and lube, oil, and fuel trucks.

Peak noise levels vary at a given location based on line of sight, topography, vegetation, and atmospheric conditions. In addition, peak noise levels would be variable and intermittent because each piece of equipment would only be operated when needed. However, peak demolition and construction noise levels would be considerably higher than existing noise levels. Relatively high peak noise levels in the range of 93 to 108 dBA (decibels, A-weighted scale) would occur on the active construction site, decreasing with distance from the construction areas. Table 1 presents peak noise levels that could be expected from a range of construction equipment during proposed construction activities.

Generally speaking, peak noise levels within 50 feet of active construction areas and material transportation routes would most likely be considered “striking” or “very loud”, comparable to peak crowd noise at an indoor sports arena. At approximately 200 feet, peak noise levels would be loud - approximately comparable to a garbage disposal or vacuum cleaner at 10 feet. At 0.25 mile, construction noise levels would generally be quiet enough so as to be considered insignificant, although transient noise levels may be noticeable at times.

Combined peak noise levels, or worst-case noise levels when several loud pieces of equipment are used in a small area at the same time as described in Table 1, are expected to occur rarely, if ever, during the project. However, under these circumstances, peak noise levels could exceed 90 dBA within 200 feet of the construction area, depending on equipment being used.

Although noise levels would be quite loud in the immediate area, the intermittent nature of peak construction noise levels would not create the steady noise level conditions for an extended duration that could lead to hearing damage. Construction workers would follow standard Federal Occupational Safety and Health Administration (OSHA) requirements to prevent hearing damage.

Areas that could be most affected by noise from construction include those closest to the construction footprint. Indoor noise levels would be expected to be 15-25 decibels lower than outdoor levels. In addition, construction noise impacts would be temporary and would be minimized through BMPs outlined in Section 5.

Indirect impacts include noise from workers commuting and material transport. Area traffic volumes and noise levels would increase slightly as construction employees commute to and from work at the project area, and delivery and service vehicles (including trucks of various sizes) transit to and from the Site. Because trucks are present during most phases of construction and leave and enter the Site via local thoroughfares, truck noises tend to impact more people over a wider area. For this Proposed Action, persons in the area near the Site would experience temporary increases in traffic noise during day-time hours. These effects are not considered significant because they would be temporary and similar to existing traffic noise levels in the area.

Table 1. Peak Noise Levels Expected from Typical Construction Equipment

Source	Peak Noise Level (dBA, attenuated)							
	Distance from Source (feet)							
	0	**50**	**100**	**200**	**400**	**1,000**	**1,700**	**2,500**
Heavy Truck	95	84-89	78-93	72-77	66-71	58-63	54-59	50-55
Dump Truck	108	88	82	76	70	62	58	54
Concrete Mixer	108	85	79	73	67	59	55	51
Jack-hammer	108	88	82	76	70	62	58	54
Scraper	93	80-89	74-82	68-77	60-71	54-63	50-59	46-55
Bulldozer	107	87-102	81-96	75-90	69-84	61-76	57-72	53-68
Generator	96	76	70	64	58	50	46	42
Crane	104	75-88	69-82	63-76	55-70	49-62	45-48	41-54
Loader	104	73-86	67-80	61-74	55-68	47-60	43-56	39-52
Grader	108	88-91	82-85	76-79	70-73	62-65	58-61	54-57
Pile driver	105	95	89	83	77	69	65	61
Forklift	100	95	89	83	77	69	65	61
Worst-Case Combined Peak Noise Level (Bulldozer, Jackhammer, Scraper)								
Combined Peak Noise Level	**Distance from Source (feet)**							
	50	**100**	**200**	**¼ Mile**	**½ Mile**			
	103	97	91	74	68			

Source: Tipler 1976

Proposed future operational activities of the expanded cemetery would include vehicle traffic to and from the Site, use of powered equipment for grave site preparation, maintenance, and upkeep, and periodic (during day-time hours) ceremonial rifle discharges. Estimated ceremonial

rifle salute noise levels at varying distances based on US Army estimates are provided in Table 2. These activities would not produce excessive noise, are consistent with the existing CBNC, and would not produce a significant adverse noise impact on surrounding land uses. The facility would be a relatively quiet cemetery.

Table 2. Estimated M-16 Rifle Blank Noise Levels at Varying Distances

Distance (meters)	A-Weighted Exposure Level (dBA)	A-Weighted Maximum Level (dBA)
50	67	76
100	61	70
200	54	63
400	40	49
800	32	41
1,600	22	31

3.8.3 Effects of the No Action Alternative

Under the No Action Alternative, the noise environment surrounding the Site would not be altered by activities of VA. The likely continued use of the Site as unimproved agricultural land would result in no/negligible noise impacts.

3.9 Land Use

The Site has been unimproved land since the closure of Camp Butler in 1866. The northern approximately 3.5-acre portion of the Site was unimproved grassy pasture land with scattered trees from at least the 1930s to the 1950s and has gradually reforested since the 1950s. An overhead electrical easement is located along the northern Site boundary between the wooded area and the northerly adjacent railroad right-of-way. The southern approximately 6.1-acre portion of the Site is cultivated agricultural land since at least the 1930s.

According to the Sangamon County Zoning Map, the Site is currently zoned Agriculture (Ag). Cemeteries are a listed conditional permitted use under the current zoning designation for the Site. The neighboring properties, including the existing CBNC, are also currently zoned Agriculture. Zoning designations for the Site and surrounding properties are shown on Figure 5.

3.9.1 Effects of the Proposed Action

The initial continued use of the Site as unimproved agricultural land prior to the expansion of the CBNC cemetery would result in no land use impacts.

The expansion of the CBNC at the Site would have land use effects as the Site is converted from unimproved wooded and agricultural land to an expansion of the CBNC. However, the proposed cemetery is compatible with the current surrounding land uses and local zoning, and is consistent with the CBNC, located 170 feet east of the Site. In addition, as a Federal agency, VA is not subject to local zoning regulations. Land use impacts would be less than significant.

3.9.2 Effects of the No Action Alternative

Under the No Action Alternative, no land use impacts due to VA's Proposed Action would occur. The likely continued use of the Site as unimproved agricultural land would result in no land use impacts.

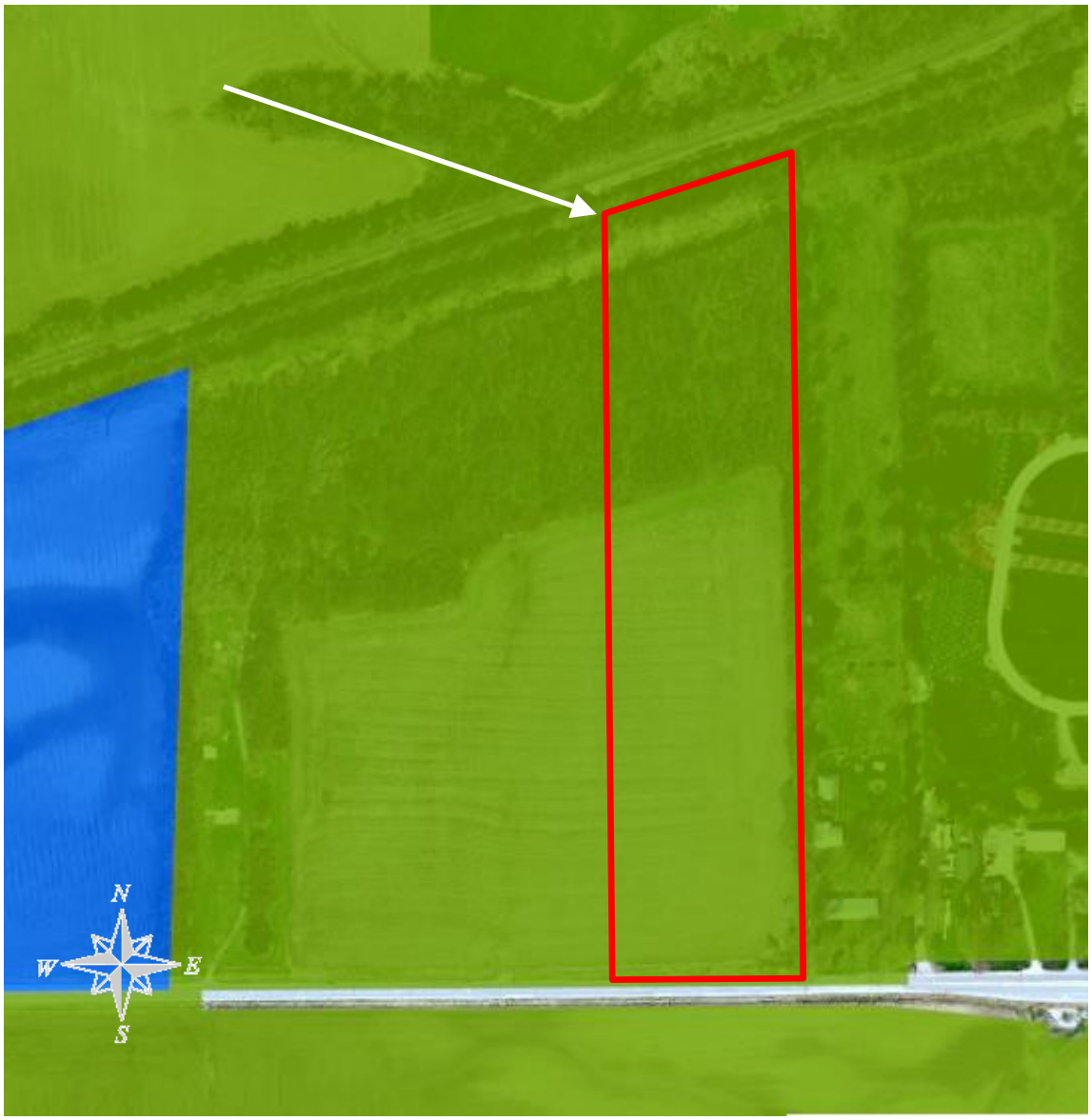

FIGURE 5
ZONING MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED CAMP BUTLER
NATIONAL CEMETERY EXPANSION
SPRINGFIELD, ILLINOIS

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, D.C.

TTL PROJECT NO.
1746803

3.10 Wetlands, Floodplains, and Coastal Zone Management

3.10.1 Wetlands

This section discusses wetlands at or near the Site and surface waters (streams) as they pertain to wetlands. Additional information regarding surface waters is provided in Section 3.6.

The USFWS National Wetland Inventory (NWI) Mapper indicated that no inventoried wetlands are located on the Site and surrounding properties. In addition, no evidence of on-site wetlands was identified on available topographic maps and aerials photographs, and no evidence of wetlands was observed during a reconnaissance of the Site. The USACE reviewed information for the Site and determined the Site does not occur in a Water of the United States.

3.10.2 Floodplains

According to available FEMA floodplain mapping (FIRM Map Number 17167C0255F, dated August 2, 2007), the Site is not located in the 100-year or 500-year floodplain (Zone X). Areas adjacent to the Site are also not included in the 100-year or 500-year floodplain.

3.10.3 Coastal Zone

The Coastal Zone Management Act (CZMA) was promulgated to control nonpoint pollution sources that affect coastal water quality. The CZMA of 1990, as amended (16 USC 1451 *et seq.*) encourages States to preserve, protect, develop, and where possible, restore or enhance valuable natural coastal resources such as wetlands, floodplains, estuaries, beaches, dunes, barrier islands, and coral reefs, as well as the fish and wildlife using those habitats. According to the National Oceanic and Atmospheric Association (NOAA), Sangamon County is not located within a designated coastal zone (NOAA 2018).

3.10.4 Effects of the Proposed Action

The Proposed Action would not result in impacts to wetlands, floodplains, or coastal zones.

3.10.5 Effects of the No Action Alternative

The No Action Alternative would result in no wetlands, floodplains, or coastal zones impacts.

3.11 Socioeconomics

The following subsections identify and describe the socioeconomic environment of the City of Springfield, Sangamon County, and the State of Illinois. Presented data provide an understanding of the socioeconomic factors that have developed the area. Socioeconomic areas of discussion include the local demographics of the area, regional and local economy, local housing, and local recreation activities. Data used in preparing this section were collected from the 2010 Census of Population and Housing (US Census Bureau 2010), subsequent US Census Bureau data, and the US Department of Commerce Bureau of Economic Analysis (BEA).

3.11.1 Demographics

The City of Springfield's estimated population in 2017 was 114,868 residents. Sangamon County's estimated population in 2017 was 196,452 residents. The estimated population total for the State of Illinois in 2017 was 12,802,023 residents (Table 3). Age distribution and high school graduation rates are generally similar for the City of Springfield, Sangamon County, and the State of Illinois. Minority populations for Sangamon County are lower than that of the City of Springfield, which are lower than that of the State of Illinois as a whole. Minority population rates specific to the Site area are discussed in Section 3.16 (Environmental Justice).

Table 3. Demographic Data for Springfield, Sangamon County, and Illinois

Area	All Individuals (2017 Estimate)	Population Under 18 Age Years (2017 Estimate)	Population Over 65 Age Years (2017 Estimate)	Minority (2017 Estimate)	High School Graduates (2017 Estimate)	Veterans (2017 Estimate)
Illinois	12,802,023	22.6%	15.2%	37.3%	88.6%	614,725
Sangamon County	196,452	22.5%	17.2%	17.5%	92.4%	13,506
Springfield	114,868	22.2%	16.1%	25.4%	91.4%	7,680

Source: US Census Bureau, 2010 Census; American Community Survey, Profile of General Demographic Characteristics, 2012-2017.

3.11.2 Income

The City of Springfield and Sangamon County have lower median household incomes and higher populations below the poverty line than the State of Illinois as a whole (Table 4). Household incomes specific to the Site area are discussed in Section 3.16.

Table 4. Regional Income for Springfield, Sangamon County, and Illinois

Area	Number of Households	Median Household Income	Population Below Poverty Level	Unemployment Rate October 2018
Illinois	4,818,452	$ 61,229	12.6%	4.2%
Sangamon County	83,673	$ 58,687	15.4%	4.2%
Springfield	50,693	$ 51,789	20.3%	4.3%

Source: US Census Bureau, 2010 Census; American Community Survey, Profile of General Demographic Characteristics, 2012-2017.
N/A – Not Available

3.11.3 Commuting Patterns

Residents of the City of Springfield and Sangamon County are largely dependent on personal automobiles for transportation to and from work. Other methods of transit include carpooling and walking. The Site is located in the Sangamon Mass Transit District (SMTD) coverage area;

however, public transportation is not available to the immediate Site vicinity from SMTD. Sangamon/Menard Area Regional Transit (SMART) also provides public transportation to the Site vicinity and stops at the CBNC are available by appointment only. The average commuting time in the City of Springfield and Sangamon County was approximately 17 to 20 minutes in 2016.

3.11.4 Protection of Children

Because children may suffer disproportionately from environmental health risks and safety risks, EO 13045, *Protection of Children From Environmental Health Risks and Safety Risks*, was introduced in 1997 to prioritize the identification and assessment of environmental health risks and safety risks that may affect children and to ensure that Federal agencies' policies, programs, activities, and standards address environmental risks and safety risks to children.

The Site is primarily active farmland with a wooded area and a utility easement along the northern boundary. Children are not regularly present at the Site. No schools or recreational areas are located within the immediate vicinity of the Site.

3.11.5 Effects of the Proposed Action

The initial continued use of the Site as unimproved agricultural land after VA's acquisition would have no socioeconomic impact.

Future construction of the proposed cemetery at the Site is anticipated to result in minor short-term positive socioeconomic impacts to local employment and personal income by providing temporary construction jobs. However, due to the intermittent and finite nature of this construction project, no long-term impacts to the construction labor force are anticipated.

The Proposed Action would result in long-term significant beneficial socioeconomic impacts by providing a regionally proximate National Cemetery of sufficient size to US Veterans and their families.

No adverse health or safety risks to children are anticipated to result from construction or operation of the cemetery at the Site. Children would only be present at the Site as visitors. Construction areas would be secured to prevent unauthorized access by children from nearby areas. The construction contractor would limit and control construction dust and noise as discussed in Section 5, thereby minimizing adverse effects to children in the area.

3.11.6 Effects of the No Action Alternative

Under the No Action Alternative, the Site would likely continue to be unimproved agricultural land, with no socioeconomic change to the Site area. However, VA would not secure land necessary to meet its long-term cemetery needs for the region, which could result in a future significant adverse, long-term, impact to US Veterans and their families. The absence of an open National Cemetery in central Illinois would require Veterans and their families to travel much longer distances (approximately 75 miles) to the nearest National Cemetery for interment, at increased cost and time, and would reduce the frequency of subsequent visits.

3.12 Community Services

The Site is located within the Springfield Public Schools District. No schools are located within 0.5-mile of the Site.

The Sangamon County Sheriff's Department provides police protection to the Site and its vicinity. The Riverton Fire Department provides fire protection and emergency medical services to the Site and its vicinity.

The Clear Lake Township Highway Services, Sangamon County Highway Department, and Illinois Department of Transportation (ILDOT) provide local road and bridge maintenance services in the Site vicinity.

Other than the Hospital Sisters Health System, located approximately 650 feet northeast of the Site, there are no major medical facilities located within five miles of the Site.

The Site is located in the SMTD coverage area; however, public transportation is not available to the immediate Site vicinity from SMTD. SMART also provides public transportation to the Site vicinity and stops at the CBNC are available by appointment only.

There are no developed recreational facilities in the immediate vicinity of the Site.

3.12.1 Effects of the Proposed Action

The initial continued use of the Site as unimproved agricultural land after VA's acquisition would have no community services impacts.

The future development of the expanded cemetery at the Site would have negligible community service impacts. No additional load is expected to be placed on the fire or sheriff departments as the result of the Proposed Action. Use of other public or community services as a result of the proposed future cemetery development is not expected.

3.12.2 Effects of the No Action Alternative

Under the No Action Alternative, no community services impacts from VA would occur. The likely continued use of the Site as unimproved agricultural land would result in no community services impacts.

3.13 Solid and Hazardous Materials

Hazardous and toxic materials or substances are generally defined as materials or substances that pose a risk (through either physical or chemical reactions) to human health or the environment.

The Site and area immediately adjoining to the east were used as barracks associated with Camp Butler from 1862 to 1866, when Camp Butler was closed. The northern approximately 3.5-acre portion of the Site was unimproved pasture land with scattered trees from at least the 1930s

through the 1950s and has gradually reforested since the 1950s. The southern approximately 6.1-acre portion of the Site has been cultivated agricultural land since at least the 1930s.

TTL completed a Phase I Environmental Site Assessment (Phase I ESA) for the Site in October 2018. The Phase I ESA did not identify any environmental concerns or recognized environmental conditions (RECs) for the Site.

3.13.1 Effects of the Proposed Action

The continued initial use of the Site as unimproved, cultivated agricultural land prior to the expansion of the CBNC at the Site would result in negligible solid and hazardous materials impacts.

The future cemetery expansion activities at the Site could result in short-term, less-than-significant impacts due to the increased presence and use of petroleum and hazardous substances during construction. A small increase in construction vehicle traffic would increase the likelihood for release of vehicle operating fluids (such as oil, diesel, gasoline, and antifreeze) and maintenance materials. As such, a less-than-significant, direct, short-term adverse impact is possible. Implementation of standard construction BMPs (Section 5) would serve to ensure this impact is further minimized.

No significant adverse long-term impacts during operation of the expanded cemetery are anticipated. Long-term operational solid and hazardous materials would be managed in accordance with applicable Federal and State laws and VA's SOPs. The development and operation of the cemetery at the Site would not result in a substantial increase in the generation of solid or hazardous substances or wastes, increase the exposure of persons to hazardous or toxic substances, increase the presence of hazardous or toxic materials in the environment, or place substantial restrictions on property use due to hazardous waste, materials, or site remediation. As noted in Section 3.6.3, based on standard modern burial practices, it is unlikely that embalming fluid would be released into the soil or groundwater.

3.13.2 Effects of the No Action Alternative

Under the No Action Alternative, no solid and hazardous materials use or effects from VA's activities at the Site would occur. The likely continued use of the Site as unimproved, cultivated agricultural land would result in negligible solid and hazardous materials impacts.

3.14 Transportation and Parking

Camp Butler Road, a generally east-west oriented, two-lane, paved road is located along the southern Site boundary. The primary entrance to the CBNC is located on Camp Butler Road, approximately 1,300 feet east of the Site, with secondary access points along Camp Butler Road (900 feet east of the Site) and Old River Road (east adjoining to the CBNC). Traffic to the CBNC is primarily provided by Interstate 55 (intersects with Camp Butler Road approximately two miles west of the cemetery) and Interstate 72 via Old Route 36 (intersects approximately two miles east and southwest of the cemetery). Average daily traffic data from 2012 were obtained from ILDOT

for Camp Butler Road. Camp Butler Road is estimated to operate at a Level of Service[1] (LOS) rating of B or better. Local roadway characteristics are shown in Table 5.

Traffic in the Site area is regulated by Clear Lake Township Highway Services, Sangamon County Highway Department, and ILDOT.

Table 5. Area Roadways

Type	Route	Direction	Road Width (feet)	Lanes	Average Daily Traffic (vehicles)	Estimated Level of Service
Rural Arterial	Camp Butler Road	East-West	30	2	5,800	B or better

Traffic Volume Data: ILDOT, 2012
N/A – not available
Other Data Source: TTL Site Reconnaissance, October 2018

3.14.1 Effects of the Proposed Action

No short-term traffic impacts would be anticipated. The Site would continue to be unimproved agricultural land after VA's acquisition until the CBNC requires expansion.

In the future, when the Site would be developed with the expanded cemetery, vehicle trips associated with burials would likely be similar to current conditions at the CBNC. The main entrance to the CBNC is located along north side of Camp Butler Road in the southern portion of the CBNC. Burial traffic would continue to use this entrance to access the Site when the expanded cemetery is developed. It is anticipated that the Site would be connected to the CBNC through a private access road across the northern portion of the parcel between the Site and the existing cemetery. Based on the anticipated similar amount of burial traffic and traffic patterns as currently exists at the CBNC, the traffic impacts associated with burials at the expanded cemetery would be less-than-significant.

As additional areas of the CBNC are developed and utilized, the number of visitors to the cemetery is likely to increase; however, the increased number of vehicle trips associated with visitors is likely to be minor.

No parking impacts are anticipated. The proposed CBNC expansion would be designed and constructed to accommodate all cemetery parking within the cemetery grounds.

3.14.2 Effects of the No Action Alternative

Under the No Action Alternative, the Site would remain unimproved agricultural land with no traffic or parking impacts.

[1] **Level of Service** – LOS represents a set of qualitative descriptions of a transportation system's performance. The Federal Highway Administration Highway Capacity Manual defines levels of service for intersections and highway segments, with ratings that range from A (best) to F (worst). Generally, a LOS of D or higher is considered acceptable by transportation planning agencies.

3.15 Utilities

With the exception of sanitary sewer services, basic utilities (potable water, electricity, and natural gas) are available to the Site vicinity.

Springfield City Water, Light, and Power (CWLP) supplies potable water to the CBNC and the Site vicinity. CBNC buildings are currently connected to the municipal water system. VA uses the municipal water service, as necessary, to irrigate the existing developed areas of the cemetery. The existing irrigation system would be expanded to the Site as part of the cemetery development activities. The potable water service at the Site is likely adequate for the Proposed Action. VA's practice is to minimize the use of irrigation water. VA would coordinate with CWLP to connect to the potable water service at the Site.

CWLP supplies the electrical service to the CBNC and the Site vicinity. The electrical service at the Site is likely adequate for the Proposed Action. The cemetery expansion would require minimal electrical service. VA would coordinate with CWLP prior to connecting to the electrical service at the Site. An overhead electrical easement covers approximately 75 feet along the northern boundary of the Site.

Ameren supplies the natural gas service to the CBNC and the Site vicinity. It is not anticipated that natural gas would be used at the expanded cemetery. VA would coordinate with Ameren prior to expanding natural gas service to the Site, if necessary.

AT&T provides telecommunication services to the CBNC and the Site vicinity. It is not anticipated that telecommunications services would be used at the expanded cemetery. VA would coordinate with AT&T to connect the Site to the telecommunication service, if necessary.

3.15.1 Effects of the Proposed Action

The initial continued use of the Site as unimproved agricultural land prior to the future expansion of the CBNC at the Site would result in no utility impacts.

Expansion of the CBNC at the Site would result in the consumption of utilities; however, the cemetery would have generally minor utility needs. Water, provided by the municipal water service, is anticipated to have the largest demand due to the need for maintaining landscaped areas of the cemetery. Low-moisture-tolerant species suited to central Illinois would be used to minimize irrigation needs. The expanded cemetery design would include on-site stormwater retention to prevent impacts to off-site water quality and hydrology. Utility impacts would be less than significant.

The expanded CBNC would be designed to avoid impacts to the existing overhead electrical lines in the northern portion of the Site.

3.15.2 Effects of the No Action Alternative

Under the No Action Alternative, no utility impacts by VA would occur. The likely continued use of the Site as unimproved agricultural land would result in no utility impacts.

3.16 Environmental Justice

In 1994, EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, was issued to focus attention of Federal agencies on human health and environmental conditions in minority and low-income communities and to ensure that disproportionately high and adverse human health or environmental effects on these communities are identified and addressed.

According to the USEPA-developed EJSCREEN (an environmental justice mapping and screening internet application), the Site is located in an area with a slightly higher low-income population (35 percent) relative to the State of Illinois as a whole (31 percent). Minority populations in the Site area (12 percent) are much lower than the State of Illinois (38 percent).

3.16.1 Effects of the Proposed Action

The initial continued use of the Site as unimproved agricultural land would have no environmental justice effects.

The proposed cemetery development at the Site would have less-than-significant environmental justice effects. Although the Site is located in areas with a slightly larger than average low-income population, the Proposed Action would have only minor impacts on the residents in the area. During construction, effects on nearby residential land uses, such as through noise and dust, would be limited and controlled through BMPs described in Section 5, thereby minimizing adverse effects to populations within the ROI.

3.16.2 Effects of the No Action Alternative

The likely continued use of the Site as unimproved agricultural land would result in no environmental justice impacts. However, VA would not secure land necessary to meet its long-term cemetery needs for the region. The absence of an open National Cemetery in central Illinois would have a disproportionate effect on low-income Veterans and their families in the region, who are less able to afford travel to a more distant National Cemetery.

3.17 Cumulative Impacts

As defined by the CEQ Regulations in 40 CFR Part 1508.7, cumulative impacts are those which "result from the incremental impact of the Proposed Action when added to other past, present, and reasonably foreseeable future actions, without regard to the agency (Federal or non-Federal) or individual who undertakes such other actions." Cumulative impact analysis captures the effects that result from the Proposed Action in combination with the effects of other actions taken during the duration of the Proposed Action in the same geographic area. Because of extensive influences of multiple forces, cumulative effects are the most difficult to analyze.

The approximately 9.6-acre Site is situated in a rural area in Clear Lake Township, Sangamon County, Illinois. The area located north of the Site across a railroad right-of-way, is occupied by large area of unimproved agricultural land (northwest) and Hospital Sisters Health System (northeast). The area located to the east of the Site is mostly unimproved grassy land with a

residence and associated outbuildings on its southern end beyond which is CBNC. The area located to the south and southwest of the Site, across Camp Butler Road, is unimproved, agricultural land. The area located to the west of the Site is unimproved, partially wooded and partially agricultural land.

Recent development in the Site area includes a self-storage facility and a church located approximately 1,100 feet and 1,600 feet west of the Site (circa 2008), a building associated with Hospital Sisters Health System located north of the Site (circa 2006), and a few residences located approximately 1,000 feet southeast of the Site (late 1990s). While there is considerable land available in the Site area for future development, development in the area will likely continue at a relatively slow pace, given its rural setting. No other specific development plans were identified for the immediate Site area.

The Proposed Action would result in the impacts identified in Section 3.2 through 3.16. These include potential impacts to aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, wildlife and habitat, noise, land use, solid and hazardous materials, transportation, utilities and environmental justice. All of these impacts are less-than-significant and would be further reduced through careful implementation of the general BMPs, management and minimization measures, and compliance with regulatory requirements as identified in Section 5. Given the nature of the Proposed Action, no significant cumulative adverse effects to any of these resource areas are anticipated. No adverse effects to wetlands, floodplains, coastal zones, socioeconomics, community services, or parking are anticipated. As such, no cumulative adverse effects to any of these resource areas are anticipated.

No significant adverse cumulative impacts to the environment, induced by the Proposed Action, are anticipated within the region. Coordination between VA, Federal and State agencies, Sangamon County, Clear Lake Township and community representatives would serve to manage and control cumulative effects within the region, including managing regional transportation increases with adequate infrastructure. Implementation of local land use and resource management plans would serve to control the extent of environmental impacts, and continued planning would ensure future socioeconomic conditions maintain the quality of life the area's residents currently enjoy. Implementation of effective resource management plans and programs should minimize or eliminate any potential cumulative degradation of the natural ecosystem, cultural or human environment within the ROI of the Proposed Action.

Under the No Action Alternative, no cumulative impacts would likely occur, as the Site would likely remain unimproved agricultural land.

3.18 Potential for Generating Substantial Public Controversy

As discussed in Section 4, VA has solicited input from various Federal, State, and local government agencies regarding the Proposed Action. Several of these agencies have provided input; none of the input has identified opposition or controversy related to the Proposed Action. VA will publish and distribute the Draft EA for a 30-day public comment period. Public comments will be considered and addressed in the Final EA.

SECTION 4: 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 the 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, are urged to participate. Records of agency coordination and public involvement associated with this EA are provided in Appendix A and Appendix E, respectively.

4.1 Agency Coordination

VA consulted with the following agencies during the preparation of this EA: USFWS, USEPA, USACE, USDA NRCS, IEPA, ILDOT, IDNR, Illinois SHPO, various Sangamon County departments, Clear Lake Township and the City of Springfield.

VA received responses from the following agencies: USACE, USDA NRCS, SHPO, IDNR, IEPA, Sangamon County Water Reclamation District (SCWRD), Sangamon County Department of Public Health (SCDPH), Springfield – Sangamon County Regional Planning Commission (SSCRPC), and Clear Lake Township. Input provided by these agencies is addressed in the appropriate resource sub-sections of Section 3. Written correspondence from the agencies is provided in Appendix A. The following summarizes that input, which VA used to focus this EA's analysis:

- **USACE** reviewed information available for the Site, determined the Site does not occur within a Water of the United States, and stated that a Clean Water Act Section 404 permit would not be required for the Proposed Action. USACE also provide an approved jurisdictional determination for the Site.

- **USDA NRCS** provided information regarding the soils that are present at the Site.

- VA provided **SHPO** information regarding known historic properties in the Site area and requested SHPO's concurrence that VA's proposed acquisition of the Site would have no effect on historic properties. SHPO concurred that the acquisition of the Site would have no adverse effect on historic properties.

- **IDNR** stated that they have no objections to the Proposed Action. IDNR stated that the State-listed threatened Franklin's Ground Squirrel has been documented within one mile of the Site and recommended that potential impacts to this species be evaluated as part of the NEPA process. Franklin's Ground Squirrels require tall grass prairie habitat, which does not exist at the Site. This species is not likely to be present at the Site.

- The **IEPA** Federal Site Remediation Section (FSRS) stated that no sites under its purview are located near the Site or would be affect by the Proposed Action. The FSRS indicated that they also queried the IEPA Bureau of Land, Air and Water Programs to determine if they had any additional information regarding the environmental condition of the Site. No additional information was received from the other IEPA programs.

- **SCWRD** stated that the Site and CBNC are located outside of the boundary of the SCWRD and are over one mile from the nearest district sanitary sewer. SCWRD indicated the Site is located within the district's planning area, but there are no plans at this time to extend the sewer to the Site.

- **SCDPH** stated that they have no information regarding the Site and provided no comments pertaining to the Proposed Action.

- **SSCRPC** stated that the Site and CBNC are located in an area that has been undermined for coal and provided a link for more information. The SSCRPC indicated the Site area is identified as Grade C Mixed Timber (mid-successional or moderately to heavily disturbed communities) in the Inventory of Sangamon County Natural Areas. SSCRPC stated that they do not anticipate adverse impacts related to noise, socioeconomics, or traffic. SSCRPC stated that other than the historic significance of CBNC, there are no other known historical features or landmarks in the immediate Site area.

- The **Clear Lake Township** Township Supervisor and Highway Commissioner indicated that they have no concerns or issues pertaining to the Proposed Action.

4.2 Native American Consultation

VA consulted with six Federally-recognized Native American tribes as part of this NEPA process, in accordance with 36 CFR Part 800.2 and EO 13175, *Consultation and Coordination with Indian Tribal Governments*, 6 November 2000. These tribes, identified as having possible ancestral ties to the area, were invited by VA to participate in the EA process as Sovereign Nations per EO 13175. VA sent a coordination and consultation letter to each of these tribes. A sample letter sent to the tribes is included in Appendix B. Section 10 contains a list of the tribes invited to consult. As of the date of this EA, no responses have been received from the Tribes.

4.3 Public Review

VA will publish and distribute the Draft EA for a 30-day public comment period as announced by a Notice of Availability (NOA) published in the State Journal – Register, a local newspaper of general circulation. A copy of the Draft EA will be made available for public review at a local public library and on the NCA website (www.cem.va.gov/cem/EA.asp). VA will respond to provided comments regarding the Draft EA within the Final EA.

SECTION 5: MANAGEMENT AND MINIMIZATION MEASURES

This section summarizes the management, minimization, and mitigation measures that are proposed to minimize and maintain potential adverse effects of the Proposed Action at acceptable, less-than-significant levels. A supplemental NEPA analysis will be conducted for the construction and operation of the expanded cemetery in approximately 5 to 10 years, during the Site design. The management, minimization, and avoidance measures in this section would be included into the future process and analysis.

Per established protocols, procedures, and requirements, VA and its contractors would implement BMPs and would satisfy all applicable regulatory requirements in association with the design, construction, and operation of the expanded cemetery at the Site. These "management measures" are described in this EA, and are included as components of the Proposed Action. "Management measures" are defined as routine BMPs and/or regulatory compliance measures that are regularly implemented as part of proposed activities, as appropriate, across Illinois. In general, implementation of such management measures would maintain impacts at acceptable levels for all resource areas analyzed. These are different from "mitigation measures," which are defined as project-specific requirements, not routinely implemented as part of development projects, necessary to reduce identified potentially significant adverse environmental impacts to less-than-significant levels.

The routine BMP, management measures and minimization measures summarized in Table 6 would be included in the Proposed Action to minimize and maintain adverse effects at less-than-significant levels.

Table 6. Best Management Practices and Minimization Measures Incorporated into the Proposed Action

Technical Resource Area	Best Management Practice/Minimization Measure
Aesthetics	Develop the cemetery in concert with the Site's natural topography. Maintain some natural areas.
	Use vegetative buffers to enhance viewscapes, particularly near the adjacent residential property.
	Comply, to the extent practicable, with the development standards of the Sangamon County Code of Ordinances (SCCO).

Table 6. Best Management Practices and Minimization Measures Incorporated into the Proposed Action (continued)	
Technical Resource Area	**Best Management Practice/Minimization Measure**
Air Quality	Use appropriate dust suppression methods (such as the use of water, dust palliative, covers, suspension of earth moving in high wind conditions) during onsite construction activities.
	Stabilize disturbed area through re-vegetation or mulching if the area would be inactive for several weeks or longer.
	Implement measures to reduce diesel particulate matter emissions from construction equipment, such as reducing idling time and using newer equipment with emissions controls.
	Comply with the applicable EPA Bureau of Air regulations.
Cultural Resources	Prior to completing the expanded cemetery site design, conduct a ground-disturbing archaeological investigation of the Site in consultation with the Illinois SHPO.
	Formally determine the eligibility of any identified historic features at the Site for listing on the NRHP and determine the potential adverse effects of the proposed cemetery expansion development in consultation with SHPO.
	If necessary, enter into a MOA under Section 106 of the NHPA with SHPO, ACHP, and other interested parties to mitigate any adverse effects.
	Should potentially historic or culturally significant items be discovered during project construction, the construction contractor would immediately cease work until VA, a qualified archaeologist, and SHPO are contacted to properly identify and appropriately treat discovered items in accordance with applicable State and Federal law(s).

Table 6. Best Management Practices and Minimization Measures Incorporated into the Proposed Action (continued)	
Technical Resource Area	**Best Management Practice/Minimization Measure**
Geology, Topography, and Soils	Control soil erosion and sedimentation impacts during construction by implementing erosion prevention measures and complying with the IEPA NPDES permitting process. Implement effective controls per a site-specific SWPPP. The NPDES permit would require stormwater runoff and erosion management using BMPs, such as earth berms, vegetative buffers and filter strips, and spill prevention and management techniques. The construction contractor would implement the sedimentation and erosion control measures specified in the NPDES permit and the SWPPP to protect surface water quality.
	Complete a Farmland Conversion Impact Rating (Form AD-1006) to address irreversibly converted prime farmland and farmland of statewide importance.
Hydrology and Water Quality	Control soil erosion and sedimentation impacts during construction by complying with the NPDES permit and the SWPPP.
	Improvements would be designed in accordance with the requirements of EISA Section 438 with respect to stormwater runoff quantity and characteristics.
	Ensure the design of the cemetery includes sufficient on-site stormwater management so as not to adversely affect the water quantity/quality in receiving waters and/or offsite areas. Obtain appropriate permits for off-site stormwater discharges.
Wildlife and Habitat	Conduct tree felling and clearing between October 15 and March 31 in consultation with the USFWS to prevent potential impacts to Indiana Bats and Northern Long-Eared Bats.
	Construction should be timed to avoid impacts to birds protected under the Migratory Bird Treaty Act. Tree removal would be conducted outside the Red-Headed Woodpecker migratory bird nesting season (May 10 through September 10) so that nests are not disturbed.
	Native species should be used to the extent practicable when re-vegetating land disturbed by construction to avoid the potential introduction of non-native or invasive species.

Table 6. Best Management Practices and Minimization Measures Incorporated into the Proposed Action (continued)	
Technical Resource Area	**Best Management Practice/Minimization Measure**
Noise	Limit, to the extent possible, construction and associated heavy truck traffic to occur between 7:00 a.m. and 6:00 p.m. on Monday through Friday, or during normal, weekday, work hours.
	Locate stationary operating equipment as far away from sensitive receptors as possible.
	Select material transportation routes as far away from sensitive receptors as possible.
	Shut down noise-generating heavy equipment when it is not needed.
	Maintain equipment per manufacturer's recommendations to minimize noise generation.
	Encourage construction personnel to operate equipment in the quietest manner practicable (such as speed restrictions, retarder brake restrictions, and engine speed restrictions).
Land Use	None required.
Wetlands, Floodplains, and Coastal Zone Management	None required.
Socioeconomics	None required.
Community Services	None required.
Solid and Hazardous Materials	Comply with VA Standard Operating Procedures and applicable Federal and State laws governing the use, generation, storage, transportation, and disposal of solid and hazardous materials.

Table 6. Best Management Practices and Minimization Measures Incorporated into the Proposed Action (continued)	
Technical Resource Area	**Best Management Practice/Minimization Measure**
Transportation and Parking	Work with the Clear Lake Township Highway Services and Sangamon County Highway Department, as applicable, during the cemetery expansion design to identify and implement roadway improvements, if necessary.
	Coordinate with the ILDOT, Clear Lake Township Highway Services, and Sangamon County Highway Department to ensure that construction and operational traffic are considered in the planning of future transportation improvements in the vicinity.
	Ensure construction activities do not adversely affect traffic flow on local roadways; construction would be timed to avoid peak travel hours.
	Ensure debris and/or soil is not deposited on local roadways during the construction activities.
Utilities	Contact the utility providers to determine the connection/extension requirements and implement the necessary requirements.
	Plant low moisture tolerant species suited to central Illinois to minimize irrigation needs.
	Develop a site design that avoids impacts to the existing overhead electrical lines in the northern portion of the Site.
Environmental Justice	None required.

The future expansion of the CBNC at the Site could have direct impacts on historic cultural resources associated with former Camp Butler. Prior to completing the expanded cemetery design, a ground-disturbing, archaeological investigation of the Site would be conducted in consultation with SHPO. VA would formally determine the eligibility of any identified historic features for listing on the NRHP and would determine the potential adverse effects of the proposed cemetery expansion development in consultation with SHPO. If historic features eligible for listing on the NRHP are identified that would be adversely affected by the proposed CBNC expansion, VA would enter into a MOA with SHPO, ACHP, and other interested parties under Section 106 of the NHPA to mitigate any adverse effects. With the completion of these NHPA mitigation measures, cultural resources impacts would be minimized or avoided.

SECTION 6: SUMMARY AND CONCLUSIONS

This EA evaluates VA's Proposed Action to acquire land near the existing CBNC, located at 5063 Camp Butler Road, in Springfield (Clear Lake Township), Sangamon County, Illinois, for the future expansion of the cemetery. This EA discusses two alternatives: (1) *Proposed Action* – Acquire approximately 9.6 acres of unimproved land approximately 170 feet west of the CBNC for the future expansion of the CBNC; and (2) the *No Action Alternative*. This EA evaluates possible effects to aesthetics; air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomics; community services; solid and hazardous materials; transportation and parking; utilities; and environmental justice.

This EA assesses the potential effects of acquiring the Site for the ultimate expansion of the CBNC, and preliminarily assesses the effects of the future proposed construction and operation of the cemetery on the Site. Potential effects of the construction and operation of the proposed expanded CBNC on the Site will be reanalyzed and reevaluated in a supplemental NEPA analysis concurrent with Site design. The management and minimization measures identified in this EA would be incorporated into that future process and analysis.

Table 7 provides a summary of the characteristics and potential environmental effects associated with the Proposed Action.

Table 7. Summary of Site Characteristics and Potential Impacts Associated with the Proposed Action

Technical Resource Area	Proposed Action
Aesthetics	Approximately 9.6 acres of unimproved, mostly level land located approximately 170 feet west of the CBNC. The northern approximately 3.5-acre portion of the Site is wooded with an overhead electrical easement along the northern boundary. The southern approximately 6.1-acre portion of the site is cultivated agricultural land. Rural, mostly agricultural area. Limited sensitive viewshed receptors in the Site area (easterly adjacent residence). No significant grade changes are anticipated. Landscaping would be installed/maintained along the southeastern boundary to reduce visual impacts to adjacent residence. Less-than-significant Impacts
Air Quality	Short-term impacts due to construction dust and particulate matter (managed through BMPs) and long-term due to vehicle emissions (similar to existing conditions). Limited sensitive air quality receptors in the Site area (easterly adjacent residence). Less-than-significant Impacts

Table 7. Summary of Site Characteristics and Potential Impacts Associated with the Proposed Action (continued)	
Technical Resource Area	**Proposed Action**
Cultural Resources	Site was formerly the location of barracks associated with Camp Butler, a military installation that housed Union soldiers and Confederate prisoners-of-war during the Civil War (1862 to 1866). Historic archaeological resources associated with former Camp Butler may be present on the Site. These potential resources have not been investigated. SHPO concurred that VA's acquisition of the Site would have no adverse effect on historic properties. Prior to completing the cemetery design, a ground-disturbing, archaeological investigation of the Site would be conducted in consultation with SHPO. If historic resources eligible for listing on the NRHP are identified that would be adversely affected by the proposed CBNC expansion, VA would enter into a MOA with SHPO, ACHP and other interested parties under Section 106 of the NHPA to mitigate any adverse effects. Less-than-significant Impacts, if mitigated under NHPA
Geology, Topography, and Soils	The Site is mostly level with a regional slope to the east. Soils consist of predominantly clay and silty clay with some sand to a depth of at least 10 feet bgs. Soil erosion and sediment impacts would be managed through BMPs. The entire Site is classified as prime farmland soils and farmland of statewide importance soils. Cemetery development requires completion of Form AD-1006 under the FPPA. Less-than-significant Impacts
Hydrology and Water Quality	No surface waters are located on the Site or adjacent properties. The nearest surface water is a stormwater retention pond at the CBNC, approximately 1,900 feet east of the Site. Groundwater is greater than 10 feet below grade. Cemetery design would include sufficient on-site stormwater management so as not to adversely affect water quantity/quality of receiving waters or off-site areas. Stormwater runoff during construction and operations would be managed through BMPs. Less-than-significant Impacts

Table 7. Summary of Site Characteristics and Potential Impacts Associated with the Proposed Action (continued)	
Technical Resource Area	**Proposed Action**
Wildlife and Habitat	The northern approximately 3.5-acre portion of the Site is wooded land. The southern approximately 6.1-acre portion of the site is cultivated agricultural land. The northern, wooded portion of the Site may support the presence of Federally and/or State-protected Indiana and Northern Long-Eared Bats as summer roosting and foraging habitat, and provides limited nesting habitat for Red-Headed Woodpeckers (protected under the Migratory Bird Treaty Act). Seasonal tree clearing (October 15 to March 31), while these bat species hibernate in off-site caves, would be conducted as part of the Proposed Action in consultation with the USFWS, as required. Tree clearing during this timeframe would also occur outside of the Red-Headed Woodpecker nesting season and would prevent impacts to the birds. Less-than-significant Impacts
Noise	Short-term noise impacts during cemetery development activities controlled through construction BMPs. Minor operational impacts associated with vehicle traffic and intermittent ceremonial rifle fire during weekday business hours, consistent with current CBNC operations. Less-than-significant Impacts
Land Use	Site is located in a mixed use, mostly agricultural area. VA is not subject to local zoning regulations. However, Site is zoned Agriculture, which conditionally allows for cemeteries. In addition, the proposed cemetery would be consistent with the CBNC land use. No/Negligible Impact
Wetlands, Floodplains, and Coastal Zone Management	No wetlands or floodplains are located at the Site or adjacent properties. No designated coastal zones in Sangamon County. No/Negligible Impact
Socioeconomics	Minor beneficial impacts to local economy as a result of temporary construction jobs. Long-term beneficial socioeconomic impacts by providing a regionally proximate National Cemetery of sufficient size to US Veterans and their families.

Table 7. Summary of Site Characteristics and Potential Impacts Associated with the Proposed Action (continued)	
Technical Resource Area	**Proposed Action**
Community Services	Community services provided to the Site area. Expanded CBNC would not put an additional load on these services. No/Negligible Impact
Solid and Hazardous Materials	The Site was occupied by barracks associated with Camp Butler in the 1860s and appears to have been unimproved land since that time. The northern portion of the Site was mostly grassy pasture land from at least the 1930s to the 1950s and has become wooded since the 1950s. The southern portion of the Site has been cultivated agricultural land since at least the 1930s. Phase I ESA of the Site identified no RECs. Potential impacts from petroleum/hazardous substance handling during construction and operation would be managed through standard BMPs and VA SOPs. Less-than-significant Impacts
Transportation and Parking	Primary access to the CBNC is provided by Camp Butler Road. Cemetery traffic would continue to use the main CBNC entrance. The Site would likely be accessed via a CBNC access road in the northern portion of the parcel separating the CBNC from the Site. Traffic volumes and patterns are anticipated to be similar to those that currently exist at the CBNC. Expanded CBNC would include adequate on-site parking. Less-than-significant Impacts
Utilities	Public utilities in the Site area are likely adequate for the proposed expanded cemetery. Primary utility demand, irrigation water, would be obtained from the municipal water supplier CWLP. Drought tolerant species suited to central Illinois would be planted to minimize irrigation needs. Overhead electrical lines that cross the northern portion of the Site would be avoided during the site design. Less-than-significant Impacts
Environmental Justice	Site is located in an area with a slightly larger than average low-income population. The Proposed Action would have only minor impacts on the limited residents in the Site area. No/Negligible Impacts

SECTION 7: LIST OF PREPARERS

DEPARTMENT OF VETERANS AFFAIRS STAFF

Ms. Christine Modovsky
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Mr. Glenn Madderom
Chief, Cemetery Development & Improvement Service
Department of Veterans Affairs
National Cemetery Administration

Mr. Maina Gakure, DBA
Realty Specialist/Project Manager
Department of Veterans Affairs
CFM, Office of Real Property

TTL ASSOCIATES, INC. (CONSULTANTS)

Name	Role	Degree	Years of Experience
Carrie Hess	Site Reconnaissance	B.S., Geology 2003	12
Paul J. Jackson	Research and Data Gathering, Document Preparation, Affected Environment, Environmental Impact Analysis, and Scoping Coordination	B.A., Biology/English 1992	20
Robin J. Clark	Project Manager, Technical Lead Technical QA/QC Review, Program Management/Project Coordination	B.S., Aquatic Environments/Environmental Science, 1985	32

SECTION 8: REFERENCES CITED

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Association of Natural Burials, 2011 and 2012.

City of Springfield, Illinois, 2019.

Clean Air Act of 1970 (42 U.S. Code [USC] 7401 et. seq.; 40 CFR Parts 50-87) Section 176(c).

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Clear Lake Township: http://clearlaketownship.net/

City of Springfield: https://www.springfield.il.us/

Sangamon County: https://co.sangamon.il.us/

Illinois Environmental Protection Agency: http://www.epa.illinois.gov/

Illinois Department of Natural Resources: https://www.dnr.illinois.gov/Pages/default.aspx

Illinois Department of Transportation: http://www.idot.illinois.gov/

US Army Corps of Engineers: http://www.usace.army.mil

National Wetlands Inventory: https://www.fws.gov/wetlands/Data/mapper.html

FEMA Flood Hazard Insurance Map: http://msc.fema.gov/portal

US Bureau of Census (2000 and 2010 US Census Data): http://www.census.gov

USDA NRCS Web Soil Survey: https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx

US Environmental Protection Agency: https://www.epa.gov

US Fish and Wildlife Service: https://www.fws.gov

US Geological Survey: https://store.usgs.gov/map-locator

Various mapping tools: www.maps.google.com, www.google.earth.com, etc.

SECTION 9: LIST OF ACRONYMS AND ABBREVIATIONS

ACA	Air Compliance Assurance
ACHP	Advisory Council on Historic Preservation
ADA	Americans with Disabilities Act of 1990
AIRFA	American Indian Religious Freedom Act
amsl	above mean sea level
ARPA	Archaeological Resources Protection Act
AST	Aboveground Storage Tank
BEA	Bureau of Economic Analysis
BLM	Bureau of Land Management
BMP	Best Management Practice
CAA	Clean Air Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CLTHS	Clear Lake Township Highway Services
CMP	Coastal Management Program
CO	Carbon Monoxide
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
E&S	Erosion and Sedimentation
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
ERP	Environmental Resource Permit
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
HAP	Hazardous Air Pollutant
IDNR	Illinois Department of Natural Resources
IEPA	Illinois Environmental Protection Agency
IICEP	Interagency and Intergovernmental Coordination for Environmental Planning
ILDOT	Illinois Department of Transportation
LOS	Level of Service
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NOAA	National Oceanic and Atmospheric Association
NO_X	Nitrogen Oxides
NPDES	National Pollution Discharge Elimination System
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
O_3	Ozone
OSHA	Occupational Safety and Health Administration
Pb	Lead
PBF	Public Buildings and Facilities
PM	Particulate matter
ppm	parts per million
PTE	Potential to emit
RCRA	Resource Conservation and Recovery Act
RI	Remedial Investigation
ROD	Record of Decision
RONA	Record of Non-applicability
SCDPH	Sangamon County Department of Public Health
SCDZ	Sangamon County Department of Zoning
SCHD	Sangamon County Highway Department
SCHPC	Sangamon County Historic Preservation Commission
SCWLP	Springfield City Water, Light, and Power
SCWRD	Sangamon County Water Reclamation District
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SO_2	Sulfur dioxide
SSCRPC	Springfield – Sangamon County Regional Planning Commission
SWPPP	Storm Water Pollution Prevention Plan
TPY	Tons per year
USACE	United States Army Corps of Engineers
USC	United States Code
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VA	Department of Veterans Affairs

SECTION 10: AGENCIES AND INDIVIDUALS CONSULTED

Agencies Consulted

U.S. Fish and Wildlife Service
Illinois – Iowa Ecological Services Field Office
1511 47th Avenue
Moline, Illinois 61265-7022
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US Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604
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US Army Corps of Engineers – Rock Island District
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Illinois Environmental Protection Agency
Land and Water Pollution Regional Office
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Illinois Environmental Protection Agency
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Illinois Environmental Protection Agency
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Illinois Environmental Protection Agency
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Illinois Department of Natural Resources
Endangered Species Consultation
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Illinois Department of Natural Resources
Water Resources
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Illinois Department of Natural Resources
Wildlife Resources
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Natural Resources Conservation Service
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Sangamon County Highway Department
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Springfield – Sangamon County Regional Planning Commission
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Sangamon County Water Reclamation District
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Clear Lake Township Highway Services
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Springfield City Water, Light, and Power
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Native American Tribes Consulted

Organization	Contract, Title	Address
Kickapoo Tribe of Indians of the Kickapoo Reservation in Kansas	Lester Randall, Chairman	1107 Goldfinch Road Horton, KS 66439
Kickapoo Tribe of Oklahoma	Estavio Elzondo, Chairman	P.O. Box 70 McLoud, OK 74851
Menominee Indian Tribe of Wisconsin	David Grignon, THPO	P.O. Box 910 Keshena, WI 54315-0910
Miami Tribe of Oklahoma	Diane Hunter, THPO	P.O. Box 1326 Miami, OK 74355
Osage Nation	Dr. Andrea Hunter, THPO	627 Grandview Avenue, Pawhuska, OK 74056
Peoria Tribe of Indians of Oklahoma	John Froman, Chief	P.O. Box 1527 Miami, OK 74355

SECTION 11: LIST OF ENVIRONMENTAL PERMITS REQUIRED

11.1 Regulatory Framework

This EA has been prepared under the provisions of, and in accordance with the NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, and VA's regulations for implementing NEPA (38 CFR Part 26). In addition, the EA has been prepared as prescribed in VA's *NEPA Interim Guidance for Projects* (VA 2010b). Federal, State, and local laws and regulations specifically applicable to this Proposed Action are specified, where appropriate, within this EA, and include:

- Endangered Species Act (ESA) of 1973, as amended (7 USC 136; 16 USC 1531 et seq.).
- Energy Independence Security Act (EISA) Section 438.
- Executive Order 11988, *Floodplain Management* (24 May 1977).
- Executive Order 11990, *Protection of Wetlands* (24 May 1977).
- Executive Order 12898, *Environmental Justice* (11 February 1994).
- Executive Order 13834, *Efficient Federal Operations* (17 May 2018).
- Farmland Protection Policy Act (FPPA) (7 USC 4201, *et seq*.)
- Federal Clean Air Act (CAA) of 1990 (42 USC 7401 *et seq*., as amended).
- Federal Clean Water Act (Federal Water Pollution Control Act) of 1948, as amended (1972, 1977) (33 USC 1251 *et seq*.); Sections 401 and 404.
- Migratory Bird Treaty Act (MBTA; 16 USC 703-712, 3 July 1918; as amended 1936, 1960, 1968, 1969, 1974, 1978, 1986, and 1989).
- Native American Graves Protection and Repatriation Act, as amended (NAGPRA) (25 USC 3001 et seq.).
- National Historic Preservation Act (NHPA) of 1966, as amended (36 CFR Part 800).
- IEPA Air Quality Regulations.
- Sangamon County Code of Ordinances.

11.2 Environmental Permits Required

In addition to the regulatory framework of the NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, VA's NEPA regulations (38 CFR Part 26), and VA's *NEPA Interim Guidance for Projects,* the following Federal, State, and/or local environmental permits are required as part of this Proposed Action, and include:

- IEPA, National Pollution Discharge Elimination System.

SECTION 12: GLOSSARY

100-Year Flood – A flood event of such magnitude that it occurs, on average, every 100 years; this equates to a one percent chance of its occurring in a given year.

Aesthetics – Pertaining to the quality of human perception of natural beauty.

Ambient - The environment as it exists around people, plants, and structures.

Ambient Air Quality Standards - Those standards established according to the CAA to protect health and welfare (AR 200-1).

Aquifer - An underground geological formation containing usable amounts of groundwater which can supply wells and springs.

Asbestos - Incombustible, chemical-resistant, fibrous mineral forms of impure magnesium silicate used for fireproofing, electrical insulation, building materials, brake linings, and chemical filters. Asbestos is a carcinogenic substance.

Attainment Area - Region that meets the National Ambient Air Quality Standard (NAAQS) for a criteria pollutant under the CAA.

Bedrock - The solid rock that underlies all soil, sand, clay, gravel and loose material on the earth's surface.

Best Management Practices (BMPs) - Methods, measures, or practices to prevent or reduce the contributions of pollutants to U.S. waters. Best management practices may be imposed in addition to, or in the absence of, effluent limitations, standards, or prohibitions (AR 200-1).

Commercial land use – Land use that includes private and public businesses (retail, wholesale, etc.), institutions (schools, churches, etc.), health services (hospitals, clinics, etc.), and military buildings and installations.

Compaction - The packing of soil together into a firmer, denser mass, generally caused by the pressure of great weight.

Contaminants - Any physical, chemical, biological, or radiological substances that have an adverse effect on air, water, or soil.

Council on Environmental Quality (CEQ) - An Executive Office of the President composed of three members appointed by the President, subject to approval by the Senate. Each member shall be exceptionally qualified to analyze and interpret environmental trends, and to appraise programs and activities of the Federal Government. Members are to be conscious of and responsive to the scientific, economic, social, aesthetic, and cultural needs of the Nation; and to formulate and recommend national policies to promote the improvement of the quality of the environment.

Criteria Pollutants - The CAA of 1970 required the USEPA to set air quality standards for common and widespread pollutants in order to protect human health and welfare. There are six "criteria pollutants": ozone (O_3), carbon monoxide (CO), sulfur dioxide (SO_2), lead (Pb), nitrogen dioxide (NO_2), and particulate matter.

Cultural Resources - The physical evidence of our Nation's heritage. Included are: archaeological sites; historic buildings, structures, and districts; and localities with social significance to the human community.

Cumulative Impact - The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonable 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 1508.7).

Decibel (dB) - A unit of measurement of sound pressure level.

Direct Impact - A direct impact is caused by a Proposed Action and occurs at the same time and place.

Emission - A release of a pollutant.

Endangered Species - Any species which is in danger of extinction throughout all or a significant portion of its range.

Environmental Assessment (EA) - An EA is a publication that provides sufficient evidence and analyses to show whether a proposed system will adversely affect the environment or be environmentally controversial.

Erosion - The wearing away of the land surface by detachment and movement of soil and rock fragments through

the action of moving water and other geological agents.

Farmland - Cropland, pastures, meadows, and planted woodland.

Fauna - Animal life, especially the animal characteristics of a region, period, or special environment.

Flora - Vegetation; plant life characteristic of a region, period, or special environment.

Floodplain - The relatively flat area or lowlands adjoining a river, stream, ocean, lake, or other body of water that is susceptible to being inundated by floodwaters.

FONSI - Finding of No Significant Impact, a NEPA document.

Fugitive Dust - Particles light enough to be suspended in air, but not captured by a filtering system. For this document, this refers to particles put in the air by moving vehicles and air movement over disturbed soils at construction sites.

Geology - Science which deals with the physical history of the earth, the rocks of which it is composed, and physical changes in the earth.

Groundwater - Water found below the ground surface. Groundwater may be geologic in origin and as pristine as it was when it was entrapped by the surrounding rock or it may be subject to daily or seasonal effects depending on the local hydrologic cycle. Groundwater may be pumped from wells and used for drinking water, irrigation, and other purposes. It is recharged by precipitation or irrigation water soaking into the ground. Thus, any contaminant in precipitation or irrigation water may be carried into groundwater.

Hazardous Substance - Hazardous materials are defined within several laws and regulations to have certain meanings. For this document, a hazardous material is any one of the following:

Any substance designated pursuant to section 311 (b)(2)(A) of the Clean Water Act.

Any element, compound, mixture, solution, or substance designated pursuant to Section 102 of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

Any hazardous substance as defined under the Resource Conservation and Recovery Act (RCRA).

Any toxic pollutant listed under TSCA.

Any hazardous air pollutant listed under Section 112 of CAA.

Any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action pursuant to Subsection 7 of TSCA.

The term does not include: 1) Petroleum, including crude oil or any thereof, which is not otherwise specifically listed or designated as a hazardous substance in a above. 2) Natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas). A list of hazardous substances is found in 40 CFR Part 302.4.

Hazardous Waste - A solid waste which, when improperly treated, stored, transported, or disposed of, poses a substantial hazard to human health or the environment. Hazardous wastes are identified in 40 CFR Part 261.3 or applicable foreign law, rule, or regulation.

Hazardous Waste Storage - As defined in 40 CFR Part 260.10, ". . . the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere".

Hydric Soil - A soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic (oxygen-lacking) conditions that favor the growth and regeneration of hydrophytic vegetation. A wetland indicator.

Indirect Impact - An indirect impact is caused by a Proposed Action that occurs later in time or farther removed in distance, but is still reasonably foreseeable. Indirect impacts may include induced changes in the pattern of land use, population density or growth rate, and related effects on air, water, and other natural and social systems. For example, referring to the possible direct impacts described above, the clearing of trees for new development may have an indirect impact on area wildlife by decreasing available habitat.

Industrial Land Use – Land uses of a relatively higher intensity that are generally not compatible with residential development. Examples include light and heavy manufacturing, mining, and chemical refining.

Isolated Wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, but do not have a direct connection to the Waters of the US.

Jurisdictional Wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, and have a direct connection to the Waters of the US. These wetlands are regulated by the USACE.

Listed Species - Any plant or animal designated as a State or Federal threatened, endangered, special concern, or candidate species.

Mitigation - Measures taken to reduce adverse impacts on the environment.

Mobile Sources - Vehicles, aircraft, watercraft, construction

equipment, and other equipment that use internal combustion engines for energy sources.

Monitoring - A process of inspecting and recording the progress of mitigation measures implemented.

National Ambient Air Quality Standards (NAAQS) - Nationwide standards set up by the USEPA for widespread air pollutants, as required by Section 109 of the Clean Air Act (CAA). Currently, six pollutants are regulated by primary and secondary NAAQS: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), ozone (O_3), particulate matter, and sulfur dioxide (SO_2).

National Environmental Policy Act (NEPA) - U.S. statute that requires all Federal agencies to consider the potential effects of Proposed Actions on the human and natural environment.

Non-attainment Area - An area that has been designated by the EPA or the appropriate State air quality agency as exceeding one or more National or State ambient air quality standards.

Parcel - A plot of land, usually a division of a larger area.

Particulates or Particulate Matter - Fine liquid or solid particles such as dust, smoke, mist, fumes, or smog found in air.

Physiographic Region - A portion of the Earth's surface with a basically common topography and common morphology.

Pollutant - A substance introduced into the environment that adversely affects the usefulness of a resource.

Potable Water - Water which is suitable for drinking.

Prime Farmland - A special category of highly productive cropland that is recognized and described by the US Department of Agriculture's Soil Conservation Service and receives special protection under the Surface Mining Law.

Remediation - A long-term action that reduces or eliminates a threat to the environment.

Riparian Areas - Areas adjacent to rivers and streams that have a high density, diversity, and productivity of plant and animal species relative to nearby uplands.

River Basin - The land area drained by a river and its tributaries.

Sensitive Receptors - Include, but are not limited to, asthmatics, children, and the elderly, as well as specific facilities, such as long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, and childcare centers.

Significant Impact - According to 40 CFR Part 1508.27, "significance" as used in NEPA requires consideration of both context and intensity.

Context. The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the Proposed Action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.

Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action.

Small quantity generator - A generator who generates greater than 220 pounds but less than 2,200 pounds of hazardous waste in a calendar month and who does not accumulate more than 13,200 pounds of hazardous waste at any one time (if either threshold is exceeded, the generator becomes a large quantity generator). A small quantity generator may accumulate hazardous waste up to 180 days from the accumulation start date.

Soil - The mixture of altered mineral and organic material at the earth's surface that supports plant life.

Solid Waste - Any discarded material that is not excluded by section 261.4(a) or that is not excluded by variance granted under sections 260.30 and 260.31.

Threatened species - Any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

Topography - The relief features or surface configuration of an area.

Toxic Substance - A harmful substance which includes elements, compounds, mixtures, and materials of complex composition.

Waters of the United States - Include the following: (1) All waters which are currently being used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide. (2) All interstate waters including interstate wetlands. (3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds; the use, degradation or destruction of which could affect interstate or foreign commerce.

Watershed - The region draining into a particular stream, river, or entire river system.

Wetlands - Areas that are regularly saturated by surface or groundwater and, thus, are characterized by a prevalence of vegetation that is adapted for life in saturated soil conditions. Examples include swamps, bogs, fens, marshes, and estuaries.

Wildlife Habitat - Set of living communities in which a wildlife population lives.

APPENDIX A

Agency Correspondence

APPENDIX B

Native American Consultation

APPENDIX C

Photograph Log

APPENDIX D

Other Relevant Environmental Data

APPENDIX E

Public Notices and Comments