

FINAL ENVIRONMENTAL ASSESSMENT

**CROWN HILL NATIONAL CEMETERY
LAND ACQUISITION**

**700 WEST 38TH STREET
INDIANAPOLIS, INDIANA
MARION COUNTY**

August 2018

ABSTRACT: The Department of Veterans Affairs (VA)'s National Cemetery Administration operates Crown Hill National Cemetery, located in Indianapolis, Indiana. The National Cemetery Administration is acquiring 14.75-acres of property to expand Crown Hill National Cemetery to provide a cremation remain burial option for the next 75 years. The VA National Cemetery Administration would be responsible for continued maintenance and operation of the cemetery.

The property to be acquired is within the adjacent Crown Hill Cemetery, a private cemetery, in the northeast corner. The existing Crown Hill National Cemetery is in the southeast corner. It will allow expansion of the existing Crown Hill National Cemetery. The initial construction phase will provide a 10-year capacity of 2,500 Columbarium Urn Niches for cremation remains. The subsequent phases will eventually develop a 75+ year capacity of 25,000 niches. Both an Environmental Site Assessment and a Cultural Resource Survey have been completed with no adverse effects identified related to the land acquisition.

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EXECUTIVE SUMMARY

Background

The U.S. Department of Veterans Affairs, National Cemetery Administration (NCA), identified, analyzed, and documented the potential physical, environmental, cultural, and economic impacts associated with expanding the Crown Hill National Cemetery. The VA is intending to acquire a 14.75-acre unwooded parcel within the surrounding Crown Hill Cemetery.

This parcel is in exchange for the original wooded 14.75-acre parcel due to community concerns. NCA evaluated other sites in the Indianapolis area for the urban initiative. These sites are listed below with the recommendation of our site evaluation team.

East Open Field site, Crown Hill Cemetery: The site was verbally offered for consideration by Keith Norwalk, President, Crown Hill Cemetery, during onsite meeting with NCA on March 23, 2017. This site is the "open field" located directly to the east of the existing NCA owned site, and is the area that citizens have indicated would be a preferred location for the cemetery. The alternative site would be well suited to accommodate a Columbarium cemetery and of the approximate same size as the existing NCA owned wooded parcel.

The site is zoned for cemetery use and would allow for a funeral procession easy access off 42nd Street. This site has several large freestanding trees that add visual accent to the site, but additional landscaping would be required to provide the privacy and seclusion from Clarendon Road to the east. This would partially shield adjacent residential houses across Clarendon Road from the cemetery activities and improve visitor privacy within the cemetery.

The site evaluation team recommends this as the preferred alternate site.

Central E-W site, Crown Hill Cemetery: The site was offered by the Laura Hare Trust via an undated letter received by NCA on March 22, 2017. This site is the "open field" located south of the existing NCA owned site. The site is generally well suited to accommodate the cemetery and is of approximately the same size as the existing NCA parcel. The site is zoned for cemetery use but would need a road constructed either to allow for funeral processions and visitor access from busy Michigan Road (not preferred) or from 42nd Street (preferred). This site is located directly adjacent to the existing Crown Hill veteran burial section which could create some visitor confusion of whether the national cemetery is, or is not part of private Crown Hill Cemetery. Additionally, the Crown Hill Cemetery spoils dump site is located directly north of this site, which causes "spoils dump traffic" on a daily basis, and would require landscaping shielding for that area of the site. In same manner as the currently owned NCA property, this site is central to, and well known by the Indianapolis veteran community.

Washington Park East Cemetery: Three parcels are being offered by the Laura Hare Trust via an undated letter received on March 22, 2017. These sites are located approximately 10 miles east of Indianapolis downtown on the far eastern edge of the Indianapolis metropolitan area. The western site 1 appears to be unimproved farmland with potential suitability for development, while the central and eastern sites 2 and 3 have powerlines, towers, and 4'-8' depths of spoils fill on each site making them undesirable for NCA use. Site 1 is zoned for cemetery use and would require cortege and visitor access off 10th Street. Site 1 is located north of the existing Washington Park East Cemetery, which is not as well known to the veteran community as Crown Hill Cemetery.

Hamilton Memorial Park Cemetery, Westfield, IN: The site was offered by Laura Hare Trust via an undated letter received on March 22, 2017. This site is located approx. 19 miles north of downtown Indianapolis on the far northern edge of the Indianapolis metropolitan area. The site appears to be generally suited to accommodate a cemetery of approximately the same size as the existing NCA parcel. Site is zoned for cemetery use but would need access off of Shady Nook Road to allow for cortege and visitor access. This location is not well known to the veteran community, and it would be bounded very closely on 3 sides by residential neighborhoods providing little privacy to cemetery visitors and potentially creating concern from those directly adjacent neighborhood residents.

Western Woods site, Crown Hill Cemetery: The site was offered by the Laura Hare Trust via an undated letter received on March 22, 2017. These western woods are full of trees, so this site is likely to be objectionable to the same eco-groups that are currently against the existing site. This location has extensive wetlands, poor topography, and possible evidence of past dumping/fill activities which make it undesirable for NCA development. Additionally, it would require corteges to enter either off Michigan Road, or else with insufficient cortege distances along 42nd Street, neither of which is desirable to NCA. The site is subject to extensive traffic noise from Michigan Road.

East Hill Cemetery, Rushville, IN: The site was offered by the Laura Hare Trust via an undated letter received on March 22, 2017. This site is located approximately 40 miles east of Indianapolis and is a totally separate community that is not part of the Indianapolis metropolitan area. The site appears to be generally suited to accommodate a cemetery of approximately the same size as the existing NCA parcel. The site is zoned for cemetery use, however the location would not be well known to the veteran community. It is not easily accessible as an Urban Initiative for veterans living in the Indianapolis metropolitan area.

Anderson Memorial Park Cemetery, Anderson, IN: The site was offered by the Laura Hare Trust via an undated letter received on March 22, 2017. This site is located approximately 34 miles northeast of Indianapolis and is a totally separate community that is not part of the Indianapolis metropolitan area. The site appears to be generally suited to accommodate a cemetery of approximately same size as existing NCA parcel. The site is zoned for cemetery use, however the location would not be well known to the veteran community. It is not easily accessible as an Urban Initiative for veterans living in the Indianapolis metropolitan area.

Proposed Action

The proposed cemetery project would create an Urban Initiative Columbarium Veterans Cemetery. It would create formal entrance and roadway system to accommodate the construction of columbarium walls, a main flagpole area, a committal shelter, and a public information center with public restrooms. The cemetery would be developed in phases with each phase accommodating approximately 10 years of cremation remains niche capacity. A total buildout would provide 90 additional years of burial options. There is no design for cemetery construction at this time.

Environmental Evaluation

An Environmental Assessment (EA) was completed evaluating the effect of the project on aesthetics, air quality, community services, community concerns, cultural resources, economic activity, flood plains, wetlands, geology, soils, hydrology, water sources, land use, noise, real

property, resident populations, solid and hazardous waste generation, transportation, public utilities, vegetation, and wildlife.

Expansion of the existing Crown Hill National Cemetery would have minimal to no effect on these areas.

Cumulative Impacts

The Federal Council on Environmental Quality regulations for implementing NEPA define cumulative effects as "the impact on the environment which 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).

This Environmental Assessment considers past, present, and reasonable foreseeable short-term and long-term future effects from implementing the Proposed Action and other projects that coincide with the location and timetable of the Proposed Action.

There are no known projects and activities in the vicinity of the Proposed Action other than the passive recreational use of the Crown Hill Cemetery grounds by the public. The surrounding area is fully built residential and institutional land use that is not changing.

1.0 PURPOSE AND NEED

1.1 Purpose

The purpose of the Proposed Action is to acquire land to continue to enable the NCA to provide eligible Veterans and their families with a burial option in a national cemetery of sufficient size and capacity to serve the projected needs in the central Indiana region for the next 100 years.

1.2 Need

The Proposed Action is needed to meet the NCA's goal of providing eligible Veterans with reasonable access to VA burial option within 75 miles of their home. This land would be acquired in order for NCA to develop a columbarium national cemetery as part of the NCA Urban Initiative program.

VA's National Cemetery Administration (NCA) is bringing burial options closer to Veterans by developing columbarium-only sites in five urban areas across the country. The project, called the Urban Initiative, will provide burial options for Veterans and their families who choose cremation close to the city core. The initiative seeks to establish columbarium-only national cemeteries in New York, Los Angeles, Chicago, Indianapolis and San Francisco/Oakland (Alameda).

NCA chose these cities for a variety of reasons to include surveys that indicate Veterans choose not to use national cemeteries because of travel and distance barriers. Another reason to build columbarium-only facilities is because it is difficult to find sufficient sites large enough to accommodate casketed burial services in these major metropolitan cities.

VA contracted an independent study in 2008 to look at VA's burial benefits program and evaluate several aspects to ensure VA continued to meet Veterans' burial needs. A part of this study examined cremations and whether or not cremation-only cemeteries would serve Veteran's needs.

The study found that Veterans were receptive to cremation burials at the nearest national or state Veterans cemetery. NCA's data shows that cremation burials are increasing throughout the country. In 2005, 39 percent of NCA burials were cremations and that number increased to 52 percent in 2014. These findings and the increase in families choosing cremation burials opened the possibility for VA to explore and implement the columbarium-only Urban Initiative.

1.3 Decision-Making

This EA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic effects associated with VA's acquisition to the Crown Hill National Cemetery in Indianapolis, Indiana.

The analysis presented within this EA is primarily to determine if the acquisition of an undeveloped 14.75-acre parcel will have significant negative social, economic, and environmental impacts.

The VA, as a federal agency, is required to incorporate environmental considerations into its decision-making process for the actions it proposes to undertake. This is done in accordance with VA and NEPA regulations and guidance.

This Final EA:

- Informs the public of the possible environmental impacts of the Proposed Action and its considered alternatives, as well as methods to reduce these impacts.
- Provides for public, state, inter-agency, and tribal input into VA's planning and evaluation
- Documents the NEPA process
- Supports informed decision-making by the federal government
- Addresses comments provided by the public on the Draft EA

The decision for this proposed federal undertaking also identifies the actions to which VA would commit to minimize environmental effects, as required under NEPA, its implementing regulations from CEQ (40 CFR 1500-1508) and VA (38 CFR Part 26), and VA's NEPA guidance (VA 2010).

The decision to be made is whether, having considered the potential physical, environmental, cultural, and socioeconomic effects, VA should implement the Proposed Action including, as appropriate, measures to reduce adverse effect.

2.0 DESCRIPTION OF THE ACTION

2.1 Proposed Action

The Proposed Action is to expand the Crown Hill National Cemetery by acquiring a

14.75-acre parcel located in the surrounding Crown Hill Cemetery and constructing columbarium walls, an access drive, flagpole area, committal shelter, and public information building with restroom facilities.

2.2 Location

The 14.75-acre unwooded parcel is located in northeast corner of the existing Crown Hill Cemetery. Crown Hill National Cemetery is located at 700 West 38th Street, Indianapolis, Indiana, in the Southern portion of the existing Crown Hill Cemetery.

The parcel to be acquired is in the Northeast section. It is bounded on the North by West 42nd Street and on the east by Clarendon Road. The parcel is approximately 500 feet wide and 1300 feet long.

Photographs of the proposed location can be found in Section 9.0 of this Final EA.

3.0 DESCRIPTION OF ALTERNATIVES

3.1 No-Action Alternative

The No-Action alternative serves as a benchmark against which the effects of the Proposed Action can be evaluated. For this project, No Action is defined as not acquiring the 14.75-acre parcel in Crown Hill Cemetery.

The No-Action alternative would challenge NCA's goal of providing eligible Veterans with reasonable access to VA burial option in the central Indiana area and therefore, would not meet the purpose and need for action.

Veterans and their families residing in the Indianapolis metropolitan area would be underserved and require Veterans and their families to travel in excess of 50 miles and over one-hour drive time to Marion National Cemetery or to use a private cemetery.

3.2 Preferred Alternative

Under the Proposed Action, the Crown Hill National Cemetery would be expanded and improved to extend burial operations through the acquisition of a 14.75-acre unwooded parcel located at in the northeast corner of Crown Hill Cemetery. If acquired, the property would be developed to include the following:

- Columbarium - columbarium walls contain niches to retain cremation remain urns with covers.
- Flagpole Area
- Committal Shelter
- Public Information Center with Restrooms
- Roadway and Parking

3.3 Basis for Selection

Indianapolis is one of five locations NCA seeks to build columbarium cemeteries as part of the "Urban Initiative Program". The cemetery expansion is intended to help better serve the Indianapolis veteran community who currently must travel in excess of 50 miles and over one-hour drive time to Marion National Cemetery for burials.

The Proposed Alternative is the preferred alternative as it enables continuation of the Federal Government to be able to provide burial service to the local and regional veteran community.

4.0 ENVIRONMENTAL IMPACT ANALYSIS

4.1 Procedures

The requirements of VA's NEPA Interim Guidance for Projects (VA 2010), are followed. The environmental consequences areas of concern listed in the VA NEPA Interim Guidance for Projects, includes 17 specific areas of concern, including aesthetics, air quality, community services, community concerns, cultural resources, economic activity, flood plains, wetlands, geology, soils, hydrology, water sources, land use, noise, real property, resident populations, solid and hazardous waste generation, transportation, public utilities, vegetation, and wildlife. These must all be evaluated. Coordination with the State Historic Preservation Office is also required.

The decision for this proposed federal undertaking identifies the actions to which VA would commit to minimize environmental effects, as required under NEPA, its implementing regulations from CEQ (40 CFR 1500-1508) and VA (38 CFR Part 26), and VA's NEPA guidance (VA 2010).

4.2 Prior Environmental Studies

There are no prior environmental studies on this site.

4.3 Aesthetics

Existing Environment

The project site consists of undeveloped land within the existing property boundary of Crown Hill Cemetery, in a 14.75 acres parcel. The land use surrounding the cemetery property is urban, residential, and institutional.

The parcel is visible to residences and a seminary along West 42nd Street which runs along the north side property line of Crown Hill Cemetery. Residences along Clarendon Road on the east side of the Crown Hill Cemetery property line have a more direct view of the project site.

There are approximately 20 trees on the property. These trees are on the perimeter and a few of them are dead.

Environmental Effects

Proposed Action

Under the Proposed Action a typical Columbarium Cemetery contains a formal entrance, funeral service waiting area (cortege lanes), a Public Information Center (gravesite/niche locator), with

public restrooms, a committal shelter, a flagpole area, and an access road from the adjacent public road. The site will change from an existing open field (undeveloped private cemetery) to a developed and manicured national cemetery landscape.

NCA will follow the Best Management Practices for the Migrating Bird Act and cut down the trees during the appropriate season. The property to be acquired is within the existing Crown Hill Cemetery and the design will be consistent with the appearance of the existing cemetery and other National Cemetery columbaria. See Section 9.0 for Photographs of the Land Parcel.

No-Action Alternative

Under the No-Action Alternative, no visual changes would occur, and there would be no impact to aesthetics.

4.4 Air Quality

Existing Environment Regional Air Quality

The Indiana Department of Environmental Management has adopted EPA's National Air Quality Standards. It defines the maximum allowable concentrations of pollutants that may not be exceeded within a given time period. The ambient standards are for the criteria pollutants of carbon monoxide, nitrogen dioxide, ozone, lead, particulate matter, and sulfur dioxide. Ozone is a regulated pollutant formed by a combination of nitrogen oxides and volatile organic compounds reacting with sunlight. Exceeding any of the EPA air pollutants is considered nonattainment of the standard in the area and a federally-approved pollution reduction plan is required.

Crown Hill Cemetery

Crown Hill Cemetery, located in Marion County, is within the Indianapolis Metropolitan Planning Area. In July 2013, Marion County was classified as in attainment of the ozone standard and maintaining the fine particulate matter standard.

Federal Facility Compliance

EPA requires that Federal activities do not cause or contribute to new violations of EPA air standards, do not cause additional or worsen existing violations of the air standards.

State and Local Air Quality Requirements

State-wide air compliance and enforcement activities are coordinated by the Indiana Department of Environmental Management, Air Compliance and Enforcement Branch. Indiana rules for air quality requires reasonably available control measures to prevent fugitive dust from becoming airborne during construction and demolition. Control measures generally include water or chemical dust suppression.

City and county-level air quality requirements fall under the Indianapolis Management Area rules, including Marion County. It focuses on air quality engineering, enforcement, and monitoring, and follows state rules.

Regional Climate

Weather and climate are important influences on air resources. Crown Hill Cemetery is located in Marion County, Indianapolis, Indiana. Indianapolis enjoys a moderate climate with warm summers and cool weather during the winter months. The Indianapolis seasons of spring and autumn are usually pleasant, with temperatures approximately 65°F. Summer in Indianapolis can

be hot, with a fairly humid climate. The warmest weather of the year is between the months of July and August, with temperatures approximately 90°F.

The winter months of December, January and February are the coolest of the year, and temperatures can drop to below freezing. Wintertime in Indianapolis can also bring snowfalls, especially during January and February. The average Indianapolis annual snowfall is 23 inches.

The city's average annual precipitation is 40 inches. The average July high is 86°F with the low being 61°F. January highs average 34°F, and lows 18°F. The record high for Indianapolis is 104.0°F, on July 14th, 1954. The record low is -27°F on January 19th, 1994. Snowfall varies from about 20 to 30 inches a year.

National Ambient Air Quality Standards

The National Ambient Air Quality Standards (NAAQS) (Table 3-1) established by the U.S. Environmental Protection Agency (EPA) and adopted by the Indiana Department of Environmental Management define the maximum allowable concentrations of pollutants that may be reached but not exceeded within a given time period to protect human health with a reasonable margin of safety. The ambient standards are for the criteria pollutants of carbon monoxide, nitrogen dioxide, ozone, lead, particulate matter (PM), and sulfur dioxide (SO₂). Particulate matter is further defined by size - less than 10 micrometers in diameter (PM₁₀) and less than 2.5 micrometers in diameter (PM_{2.5}).

While ozone is a regulated pollutant, it is not emitted directly from sources but is formed by a combination of nitrogen oxides and volatile organic compounds (VOCs) reacting with sunlight in the atmosphere. Exceeding any of the NAAQS constitutes nonattainment of the standard in the area. A federally enforceable state implementation plan (SIP) is required for areas of nonattainment, and an EPA-approved maintenance plan is required when an area is reclassified from nonattainment to attainment.

The Crown Hill Cemetery, located in Marion County, is within Indianapolis Metropolitan Planning Organization (MPO). The Indianapolis MPO lies within or partly within areas previously classified as non-attainment by the U.S. EPA. In July 2013, the nine-county area including Marion County was classified as in attainment of the NAAQS for ozone (2008 8-hour standard). In the same month, the area including Marion County was classified as maintenance for the fine particulate matter (PM 2.5) under the 1997 standard.

Federal and Indiana Ambient Air Quality Standards

Pollutant	Primary/ Secondary	Averaging Time	Level	Form
Carbon monoxide	primary	8-hour	9 ppm	Not to be exceeded more than once per year
		1-hour	35 ppm	Not to be exceeded more than once per year

Lead	primary and secondary	rolling 3-month average	3 1	Not to be exceeded
Nitrogen dioxide	primary and secondary	1-hour	100 ppb	98th percentile of 1-hour daily maximum concentrations, averaged over 3 years
		annual	2 53 ppb	Annual mean
Ozone	primary and secondary	8-hour	3	Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years
PM2.5	primary	annual	3 12 µg/m	Annual mean, averaged over 3 years
	secondary	annual	3 12 µg/m	Annual mean, averaged over 3 years
	primary and secondary	24-hour	35 µg/m ³	98th percentile, averaged over 3 years
PM10	primary and secondary	24-hour	150 µg/m ³	Not to be exceeded more than once per year on average over 3 years
Sulfur dioxide	primary	1-hour	4 75 ppb	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years
	secondary	2-hour	0.5 ppm	Not to be exceeded more than once per year

General Conformity Requirements

General conformity requirements (EPA 2014) apply to all-federal actions to ensure that:

- Federal activities do not cause or contribute to new violations of a NAAQS
- Actions do not cause additional or worsen existing violations of the NAAQS, or contribute to new violations
- Attainment of the NAAQS is not delayed

The implementing regulations for the general conformity rule establish *de minimis* thresholds for criteria pollutants and precursors (40 CFR 93 Subpart B). A "conformity determination" is required for each criteria pollutant or precursor where the total of direct and indirect emissions of the criteria pollutant or precursor in a nonattainment or maintenance area caused by a federal action would equal or exceed any of the *de minimis* thresholds (40 CFR 93.153(b)). Table 3-2 lists the *de minimis* emissions levels for the nonattainment areas that are applicable to the Indianapolis Metropolitan Planning Organization.

Table 2 Applicable *de minimis* Emission Levels for Nonattainment Areas under General Conformity Rule

Area Designation	Pollutant	Precursor	<i>de minimis</i> level (tons/year)
All SO ₂ nonattainment areas	SO ₂	none	100
All lead nonattainment areas	Lead	none	25 -
Ozone nonattainment areas outside an ozone transport region other than one designated as Serious, Severe, or Extreme	ozone	VOC or nitrogen oxides	100

State and Local Air Quality Requirements

State-wide air compliance and enforcement activities are coordinated by the IDEM, Air Compliance and Enforcement Branch. Indiana rules for air quality requires reasonably available control measures to prevent fugitive dust from becoming airborne during construction and demolition. Control measures generally include water or chemical dust suppression (IAC 326). City and county-level air quality requirements fall under the Indianapolis MPO, serving nine central Indiana counties including Marion County. The MPO focuses on air quality engineering, enforcement, and monitoring; however, it directs users to the IDEM and defers to their regulations (IAC 326, Title 2).

Existing Emissions Sources

The Crown Hill National Cemetery does not have any current emission sources. Power and heat to existing structures are supplied from the local utility service.

Sensitive Receptors

CEQ's NEPA regulations require evaluation of the degree to which the proposed action affects public health (40 CFR 1508.27). Children, elderly people, and people with illnesses are especially

sensitive to the effects of air pollutants; therefore, hospitals, schools, convalescent facilities, and residential areas are considered to be sensitive receptors for air quality impacts.

The area surrounding Crown Hill Cemetery contains residential and institutional land uses. The Indianapolis Canal and the White River are approximately 0.25 mile northwest of the property separated by roads, the Christian Theological Seminary, and residences. Within Crown Hill Cemetery immediately adjacent to the proposed project area is a continuation of the forest to the west.

Large, mowed grassy fields are present to the south and east. No schools or hospitals are located within one mile of the cemetery.

Environmental Effects

The proposed project is located in an air quality control region designated as attainment and maintenance.

Proposed Action

Marion County is in maintenance status for Ozone (O₃), Carbon Monoxide (CO), and Fine Particulate Matter (PM_{2.5}). The proposed project is exempt from conformity determination because it is a cemetery expansion project that is for passive use. The proposed project would not increase O₃, CO, and PM_{2.5} emissions.

The proposed action will not require an air emissions permit, registration, or license during construction or during normal operations after site development.

The proposed action will not release objectionable odors, smoke, dust, suspended particles, or noxious gases into the air during construction or during normal operations after site development.

The proposed action will not expose sensitive receptors to pollutants during construction or during normal operations after the site development. Potential construction could include approximately 60 days of earthwork activities (excavation and grading).

Particulates are the main air pollutant of concern from construction projects. Project activities would comply with state-requirements (IAC 326) by implementing reasonably available control measures (generally including water or chemical dust suppression) to prevent fugitive dust from becoming airborne. Construction activities would generate both coarse and fine particulate emissions from soil excavation and removal, grading and sloping, and small-scale road construction.

The amount of particulate emissions can be estimated from the amount of ground surface exposed, the type and intensity of activity, soil type and conditions, wind speed, and dust control measures used. Total suspended particulates were calculated using the emission factor for heavy construction activity operations from "AP-42, Compilation for Air Pollutant Emission Factors" (EPA 1995), to provide a conservative estimate of PM emissions. Estimates are shown in Table 3.

Table 3 Estimate of Annual Particulate Emissions from Construction

Total Area (acres)	Exposed Area (acres)	Construction Duration (months)	Emission Factor (tons/acre/month)	Control Efficiency (%)	Total Suspended Particulate Emissions (tons)
14.75	14.75	2	1.2	80	14.4
Emission factor for "Heavy Construction Operations (EPA 1995).					

Non-road construction vehicles would emit less than significant amounts of SO₂ and the ozone precursors VOCs and NO_x. They would not emit lead. Criteria pollution emissions from construction equipment were calculated assuming the use of three backhoes, one grader, and one bulldozer operating for approximately eight hours per day for a total of 60 days. Emissions were estimated using "Off-Road - Model Mobile Source Emission Factors" from the California South Coast Air Quality Management District because Indiana and federal EPA emission factors are not available. Table 3-4 and Figure 3-1 show estimated emissions and calculations, respectively. Emissions of SO_x, lead, NO_x, and VOCs are below *de minimis* thresholds; therefore, conformity determinations are not required.

**Table 4
Estimate of Annual Non-Road Emissions of Criteria Pollutants**

Criteria Pollutant ²	SO _x	NO _x	Estimated Emissions ¹ VOCs ³	CO	Lead
Emissions (tons)	0.0015	1.0954	0.1440	0.6599	0
de minimis level (tons/year)	100	100	100	NA	25

¹ Calculated using "Off-road Mobile Source Emission Factors (Scenario Years 2007 - 2025) (SCAQMD 2014).

² PM emissions from non-road construction vehicles are included in the general construction emissions factor applied in the estimates in Table 3-3, and therefore non-road emissions of PM are not included in this table.

³ VOCs are assumed to be equivalent to Reactive Organic Gases for calculating non-road construction equipment emissions.

No-Action Alternative

The No-Action alternative would result in no change to the existing air quality.

4.5 Community Services

Existing Environment

Community services include police protection, fire protection, emergency services, schools, health care, and parks and recreation.

Environmental Effects

Proposed Action

No additional services are expected to be needed from the fire or police departments, as these services are already provided to the Crown Hill Cemetery. Changes are not expected in use of or access to public or community services as a result of the land acquisition.

No-Action Alternative

The No-Action alternative would result in no change to the existing community services.

4.6 Cultural Resources

Cultural resources include both historic and prehistoric archaeological resources, as well as historic structures. This impact analysis focused on sites and structures listed in, or eligible for nomination to, the National Register of Historic Places (NRHP), and the regulations (36 CFR Part 800) for implementing Section 106 of the *National Historic Preservation Act of 1966*.

Existing Environment

Crown Hill Cemetery is an existing private cemetery dating to 1864. The Crown Hill National Cemetery is in the southern portion of the private cemetery and was constructed in 1866. The Proposed Action property is one mile north in the northeast corner of the Crown Hill Cemetery. The project area is located in Marion County on the 1998 Indianapolis West quadrangle in the: NW $\frac{1}{4}$ of the SW $\frac{1}{4}$ of Section 14 (SW corner alignment), Township 16N, Range 3E in Washington Township. The project area is set in an open field tract within Crown Hill Cemetery.

Crown Hill Cemetery was listed in the National Register of Historic Places (NRHP) in 1973 under Criterion C, Criteria Consideration D, for its significance in the fields of landscape architecture and architecture. However, its NRHP boundaries do not extend north of West 38th Street and do not include the project area.

The portion of Crown Hill Cemetery north of West 38th Street (the project area) is not included in the NRHP-listed portion of the cemetery, as it was not designed with a planned landscape and is mostly of recent origin.

Examination of the Indiana State Historic Architectural and Archaeological Research Database (SHAARD) and the *Washington Township, Marion County Interim Report* (Historic Landmarks Foundation of Indiana [HLFI] 1998) identified no previously documented properties within the area potentially affected by the cemetery project. The NRHP Criteria for Evaluation have not previously been formally applied to any properties within the surrounding project area. According to the Indiana Historic Bridge Inventory, no bridge or small structure is within the project area.

National Historic Preservation Act, Section 106 Environmental Effects

The Section 106 Criteria for Adverse Effect (36 CFR 800.5) defines an undertaking (action) as having an adverse effect on historic properties if the undertaking would alter, directly or indirectly,

any of the characteristics that qualify a property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. The analysis considers potential effects to cultural resources located in and within view of the project area.

Proposed Action

There would be no adverse effect. Since the proposed parcel to be acquired and developed is not within or immediately adjacent to the existing historic Crown Hill National Cemetery, it would result in a finding of no adverse effect to the existing NRHP Crown Hill Cemetery property. A letter dated January 22, 2018 from the Indiana State Historic Preservation Office, State Historic Preservation Officer, has concurred with the finding of no adverse effect.

No-Action Alternative

No property acquired and construction activity would occur under the No Action alternative. Therefore, there would be no impact to cultural resources.

4.7 Economic Activity

Economic Activity refers to the effect that the project would have on local wages, employment, and local purchases of goods and services.

Existing Environment

The existing Crown Hill National Cemetery is closed. Only second interments in an existing occupied gravesite are allowed. The grounds are maintained through a private contract.

Environmental Effects

Proposed Action

Acquisition and development of the proposed site would enable the Crown Hill National Cemetery to again offer a burial option, limited to cremation remain niches for urns in a Columbarium Wall.

Short term impacts would include increased employment and material and services purchases during construction. Long term impacts include that the cemetery will remain in operation for the foreseeable future, with associated operation and maintenance services and materials to be purchased.

No-Action Alternative

Under No-Action Alternative, cemetery expansion would not occur and there would be no effect on economic activity.

4.8 Floodplains, Wetlands, and Coastal Zone Management Areas

Floodplains are those areas delineated by the Federal Emergency Management Agency in their Flood Plain Maps indicating both 100-year and 500-year floodplains.

Wetlands are areas that (1) are subject to inundation or saturation near the surface for a period during the growing season, (2) have a vegetation cover dominated by plants adapted to wet conditions (i.e., hydrophilic plants), and (3) have soils with characteristics that developed due to waterlogging (i.e., hydric soil).

Coastal Zone Management Areas are sensitive environments near coastal areas.

Existing Environment

Crown Hill Cemetery is located in an upland area. The Indianapolis Canal and the White River are approximately one-quarter mile northwest of the property separated by roads, the Christian Theological Seminary, and residences.

Floodplains

The Proposed Action is not within any flood hazard zone mapped by the Federal Emergency Management Agency (FEMA).

Wetlands

A *Waters of the U.S. Determination and Wetland Delineation Survey* was conducted for the adjacent property on April 30 and May 1, 2015 (ASC Group, Inc.). The purpose of the assessment was to identify potential wetland areas that would be regulated under the jurisdiction of the U.S. Army Corps of Engineers (USACE) under Section 404 of the *Clean Water Act*, or the Indiana Department of Environmental Management 401 Water Quality Certification Program. One wetland was identified as isolated with no direct connectivity to other waters of the U.S.

A wetland delineation was completed in 2015 for the 14.75-acre wooded parcel, adjacent to the west side of the unwooded parcel being acquired. The new parcel has the cusp (the exit) of the wetland outlet from the adjacent wetland flowing into the new land acquisition, therefore the wetland delineation completed in 2015 is relevant. IDEM has visited the site on November 7, 2017 and has given NCA the requirements and recommendations for this isolated wetland cusp area for our new land acquisition.

Marion County is not located in the Indiana Coastal Zone Management Area (IDNR - Coastal Zone Management Program). Therefore, coastal zone management is not discussed further in this EA.

Environmental Effects

Proposed Action

The acquisition of the property will have no impact to this wetland. No design details or conceptual plan is currently available for the location of the columbarium, flagpole area, public information building with restrooms, roadway and parking areas. Every effort to avoid impacts to this wetland will be made during the design phase.

If impact to wetland is unavoidable and is equal to or greater than 0.10 acre, an IDEM 401 permit would be required.

No-Action Alternative

Under No-Action Alternative, cemetery expansion would not occur and no impacts to floodplains, wetlands, and coastal zone management areas would result.

4.9 Geology and Soils

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

Existing Environment

The proposed parcel is located in the Central Till Plain Region of Indiana. Two soil types are mapped on site: Miami Silt Loam (MmA, 0-2 percent slopes) which is well-drained, and Miami Silt Loam (MmB2, 2-6 percent slopes) which is moderately well-drained.

The Crown Hill Cemetery is located in seismic zone 1, indicating some earthquakes have occurred and are expected, but little or no damage should result.

The site is generally flat with very gradual sloping from the west and east sides of the proposed parcel. Site drainage is moderate as there are some areas of water retention and one small portion of an adjacent isolated forested wetland present.

The early coordination response received from the Indiana Geological Survey did not identify any issues associated with the site geology and soils.

The early coordination response from the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS) state that no prime or unique farmland would be converted from the cemetery expansion project.

Table 5 shows the NRCS National Cooperative Soil Survey for the cemetery project site. Table 5 presents the acreages associated with each soil type.

Table 5 Crown Hill Cemetery Soils

Soil Map Unit	Soil Name	Acres	Percent
MmA	Miami Silt Loam (0-2 percent slopes)	7.25	9
MmB2	Miami Silt Loam (2-6 percent slopes)	7.50	51

Environmental Effects

Soil characteristics in the proposed project area would not preclude cemetery use.

No-Action Alternative

Under the No-Action alternative, cemetery expansion would not occur and no impacts to geology and soils would result.

Proposed Action

The proposed action would occur in an area of minimal sloping, towards natural site drainages. Soils generated during excavation would be reutilized in areas requiring fill material or transported offsite. Site topography would not be substantially altered.

Stormwater

The site is generally flat with gradual sloping from the west and east perimeter of the parcel, and then to the south center. Site drainage is moderate with areas of water retention.

Drainage changes resulting from changes to site topography are anticipated to be minimal and would be monitored for erosion potential through routine site stormwater management practices.

Minor short-term erosion and sedimentation impacts would be possible during the construction phase of the project. Construction activities (including vegetative clearing, adjustments to site grading, new roadway construction, and construction of small structures) would disturb and expose subsurface soils, increasing susceptibility to wind and surface runoff erosion. Wind erosion could temporarily increase airborne particulate matter in the area, resulting in short-term health, visibility, and aesthetics impacts. Minor short-term erosion and sedimentation impacts would be minimized through implementation of construction Best Management Practices.

There are existing storm water drains on the south side of the site from previous Crown Hill Cemetery projected use. These will be replaced based on the design of the new cemetery. All storm water flows into the municipal storm water system. Temporary increases in sedimentation in storm water drainages could occur as a result of surface runoff erosion. Any impacts would be minimized through implementation of construction Best Management Practices. These would be determined after the initial design has been completed.

A formal erosion and sediment control plan will be completed as required by IDEP and EPA. Depending on site conditions and construction expected, the plan could include structural features, such as protecting existing storm and catch basin inlets, perimeter and specific work site sedimentation fences, a sedimentation basin, washout area for construction vehicles, and covering stockpiled storage of material, spoil, and soil. Nonstructural features might include stabilizing cut areas with seeding/mulch as soon as possible after disturbance, and phasing construction to minimize exposed soil. All practices would comply with EPA National Pollutant Discharge Elimination System (NPDES) permit requirements. In addition, a general storm water permit from the Indiana Department of Environmental Management will be obtained, and those requirements would be followed.

4.10 Hydrology and Water Quality

Hydrology and Water Quality refers to the effect of the action on surface water and groundwater

Existing Environment

The Crown Hill Cemetery proposed property is in the Upper White River watershed (Hydrologic Unit Code 0512020). The site contains one isolated forested wetland within the proposed perimeter.

The site is generally flat with gradual sloping from the west and east perimeter of the parcel. Site drainage is moderate with areas of water retention.

Environmental Effects

Surface water would not be significantly impacted by cemetery construction and operations. It is anticipated that a slight increase in surface water runoff can be expected. This will be addressed

in the design stage by onsite retention. Restroom facilities will be connected to the city water and sewer system. No negative impacts to groundwater or water quality are anticipated.

Proposed Action

Short-term adverse erosion and sedimentation impacts associated with construction activities would be possible, as described previously. Minimization strategies are construction Best Management Practices and conformance with EPA National Pollutant Discharge Elimination System (NPDES) permit requirements. Long-term impacts would not be expected.

It is anticipated that a slight increase in surface water runoff can be expected. This will be addressed in the design stage. Restroom facilities to be constructed will be connected to the city water and sewer system.

Cemetery operations in the area of the Proposed Action would have no impact to groundwater as no in-ground burials are proposed. The use of cremation interment and columbaria will not impact groundwater resources in the area. The use of groundwater for irrigation of the cemetery landscape has not been proposed.

No-Action Alternative

Under No-Action Alternative, cemetery expansion would not occur and no impacts to hydrology and water quality would result.

4.11 Land Use

Land Use refers to the impact of the project on existing land use and changes in land use.

Existing Environment

Crown Hill Cemetery is an existing 555- acre fenced private cemetery dating to 1864. The existing Crown Hill National Cemetery is in the southern portion of the private cemetery. The Proposed Action property is in the northeast corner of the Crown Hill Cemetery. The area surrounding Crown Hill Cemetery contains residential and educational land uses. The only access is through the gated entrance.

The Indianapolis Canal and the White River are approximately one-quarter mile northwest of the property separated by roads, the Christian Theological Seminary, and residences.

Environmental Effects

Proposed Action

The Proposed Action would occur within the fenced boundary of the Crown Hill Cemetery property. The continuation of cemetery land use is compatible and will continue to be so. There would be no land use impacts as a result of the Proposed Action.

No- Action Alternative

Under No-Action Alternative, cemetery expansion would not occur and no change to land use would result.

4.12 Noise

Noise refers to the generation of noise by construction or normal operations on the property.

Existing Environment

The area surrounding Crown Hill Cemetery contains residential and institutional land uses. The Indianapolis Canal and the White River are approximately one-quarter mile northwest of the property separated by roads, the Christian Theological Seminary, and residences. Within Crown Hill Cemetery, immediately adjacent to the west side of the proposed project area, is a continuation of a forested area.

The principal sources of noise in the area include traffic and on the cemetery property, periodic construction and maintenance activities, and ceremonial rifle salutes. The overall noise levels are typical of a quiet area and are consistent with a cemetery setting.

Environmental Effects

Operation of the cemetery to date (including ceremonial rifle salutes) has not resulted in noise complaints from neighboring residents in the past. Sources of operational-related noise include ceremonial rifle salutes and grounds maintenance equipment (including mowers, leaf blowers, and small vehicles).

These operational-related noise sources are consistent with the current operations of the cemetery and have not resulted in noise complaints from neighboring residents. Veteran's military honors can be accompanied with a rifle salute (resulting in an approximate average of one or two instances per weekday).

Proposed Action

The Proposed Action, parcel acquisition, would not result in minor, intermittent, or long-term adverse noise impacts. Sources of operational-related noise include ceremonial rifle salutes and grounds maintenance equipment (including mowers, leaf blowers, and small vehicles) would continue as in the past. These operational-related noise sources are consistent with the current operations of the cemetery and have not resulted in noise complaints from neighboring residents in the past.

Potential construction activities after the property acquisition could result in minor short-term adverse noise impacts. Sources of construction-related noise would include construction equipment (including land clearing and grading equipment, trucks removing excess soils and waste, and road construction and paving equipment) and other contractor vehicles commuting to and from the site.

Construction activities would be scheduled to minimize impacts to interment ceremonies to the extent possible. Construction will take place during daylight hours unless there is a specific action that would directly impact the operation of the cemetery.

No-Action Alternative

Under No-Action Alternative, cemetery expansion would not occur and no impacts to noise would result.

4.13 Potential for Generating Substantial Controversy (Community Concerns)

Existing Conditions

Crown Hill Cemetery is an existing private cemetery dating to 1864. The existing Crown Hill National Cemetery is in the southern portion of the private cemetery. The Proposed Action property is in the northeast corner of the Crown Hill Cemetery.

The area surrounding Crown Hill Cemetery contains residential and educational land uses. The Indianapolis Canal and the White River are approximately one-quarter mile northwest of the property separated by roads, the Christian Theological Seminary, and residences.

A previous parcel that was considered for the cemetery expansion was fully forested. Due to community concerns, VA sought an alternate location. The proposed 14.75-acre site is open field area with approximately 20 dispersed trees.

The National Cemetery Administration held public meetings to discuss an alternate location for cemetery expansion. As a result, the 14.75-acre unwooded open field was selected.

The VA has included a public involvement process. It consisted of the publication of a Notice of Availability of the Draft EA on January 4, 2018, and held a Public Meeting on January 23, 2018 in the Indiana World War Memorial in Indianapolis, Indiana.

Thirty-five people attended the meeting. Seven oral questions were recorded and 9 written questions were received. The audience was supportive of the new cemetery and new location. All questions were considered in the Final EA.

Environmental Effects

Proposed Action

NCA has solicited input from various federal, state and local government agencies, community groups, and other stakeholders regarding the Proposed Action. None of these parties expressed opposition to the Proposed Action. These parties will also have an opportunity to comment on this Draft Environmental Assessment (EA), with their input incorporated in the Final EA.

Potential stakeholders were contacted when NCA initially purchased the 14.75-acre wooded parcel. NCA is exchanging the 14.75-acre wooded parcel for a 14.75-acre unwooded, open parcel of land with Crown Hill Cemetery and the potential stakeholders were notified of the land acquisition. See Section 10 Stakeholders for the list of names.

VA published the Notice of Availability of the Draft EA on January 4, 2018, and held a Public Meeting on January 23, 2018 in the Indiana World War Memorial in Indianapolis, Indiana. Thirty-five people attended the meeting. 7 oral questions were recorded and 9 written questions were received. The audience was supportive of the new cemetery and new location. All questions were considered in the Final EA.

Because the Proposed Action is a cemetery-use within the Crown Hill Cemetery property boundary, and will not result in substantial loss of forested areas, it is unlikely to generate substantial controversy.

No-Action Alternative

Under the No-Action alternative, cemetery expansion would not occur and no potential for controversy would occur.

4.14 Real Property

Real Property refers to the potential of the project to effect land on tax rolls, changes in land values, encroachment on critical areas, changes in boundaries, rights-of-way, and easements.

Existing Environment

The proposed property is already zoned for cemetery use in an existing cemetery, which is tax-exempt. Wetlands will be avoided. There would be no effect on tax rolls or land values.

Environmental Effects

Proposed Action

There is no impact potential for Real Property as a result of this land acquisition. The property to be acquired is already zoned for cemetery use. It will continue to be used for cemetery use.

This parcel is in exchange for the original wooded 14.75-acre parcel due to community concerns.

No-Action Alternative

Under the No-Action Alternative, cemetery expansion would not occur and no impacts to Real Property would result.

4.15 Resident Population

Resident Population refers to the effect the Proposed Action would have on staffing, altering the demographic nature of the area, and changes in the neighborhood characteristics.

Existing Conditions

The area surrounding Crown Hill Cemetery contains residential and educational land uses. The Indianapolis Canal and the White River are approximately one-quarter mile northwest of the property separated by roads, the Christian Theological Seminary, and residences.

Crown Hill Cemetery is an existing private cemetery dating to 1864.

The existing Crown Hill National Cemetery is in the southern portion of the private cemetery. The Proposed Action property is in the northeast corner of the Crown Hill Cemetery.

The existing Crown Hill National Cemetery is operated by a contractor. Under the proposed Action, this contract operation would be extended to the new area.

Environmental Effects

Proposed Action

The proposed site is already part of the existing Crown Hill Cemetery. It will continue to be used for cemetery activities.

The existing Crown Hill National Cemetery is operated under a contract. Under the proposed Action, this contract operation would be extended to the new area.

There will be no effects on the resident population as a result of the land acquisition.

No-Action Alternative

Under No Action Alternative, cemetery expansion would not occur and no impacts to Resident Population would result.

4.16 Solid and Hazardous Waste

Existing Environment

The Proposed Action is within an open field in which no development has taken place. The site does not currently generate solid or hazardous waste. There is no documented occurrence of contamination or underground storage tanks on the property or immediately adjacent it.

Environmental Effects

Proposed Action

Construction related activities under the Proposed Action have the potential to generate solid waste. However, solid waste generation from these activities is anticipated to be a minor contributor and would not result in adverse impacts.

Solid waste would continue to be generated by cemetery operations on a routine basis. Solid waste generally consists of flowers and other items left behind at burial sites.

The solid waste that is generated would be collected weekly, as needed, and transferred to a municipal solid waste landfill.

Hazardous wastes may be generated by contractors as needed for activities such as construction, pest control, and weed management. All federal, state and local regulations for hazardous waste will be followed.

Cemetery operations under the Proposed Action would generate minimal amounts of solid waste and would not result in adverse impacts. Pesticide application and road maintenance would be expanded to the new operational areas, but would continue to be serviced by contractors in accordance with material specifications and would not result in adverse impacts.

No-Action Alternative

Under the No-Action alternative, cemetery expansion would not occur and no impacts to solid waste and hazardous materials would result.

4.17 Transportation and Parking

Existing Environment

Crown Hill Cemetery is located in an urban area of Marion County within four miles of the Indianapolis downtown city center, and dates to 1864. The existing Crown Hill National Cemetery dates to 1866 and is in an older, southern part of Crown Hill Cemetery. It is south of West 38th Street and accessible from the main entrance at Boulevard Place and West 34th Street.

The proposed property is in the northeast corner of the newer part of Crown Hill Cemetery, north of West 38th Street and accessible from the entrance on Clarendon Road. The main entrance is

located approximately 600 feet north of West 38th Street on Clarendon Road, near the Crown Hill Cemetery Funeral Home. A second potential entrance is another ¼ mile north on Clarendon Road, near West 41st Street.

Crown Hill Cemetery and Crown Hill National Cemetery employees and visitors primarily use the first Clarendon Road entrance daily during cemetery hours for Crown Hill Cemetery with a gate that is locked in the evening.

Vehicle travel along Clarendon Road in the vicinity of the cemetery is typically associated with Crown Hill Cemetery visitations and operations along with travel by area residents. Traffic count data along Clarendon Road is not available, but the 2002 average daily traffic along the principal arterial road, West 38th Street, which bisects the Crown Hill Cemetery property, is approximately 30,000 vehicles. Most vehicles are not turning north on Clarendon or south on Boulevard for entrance into the cemetery property. There is a significant amount of recreational use of the Crown Hill Cemetery property. Individuals and small groups of runners, bikers, and walkers use roadways within the private cemetery grounds.

Environmental Effects

Proposed Action

Operation of the proposed expansion of Crown Hill National Cemetery would increase the vehicle traffic by 10 cars per day, a small percentage of the main Crown Hill Cemetery traffic. No significant impacts to the area transportation network would be expected.

The impact of the new national cemetery property on day-to-day transportation is expected to be minimal. Expected new Crown Hill National Cemetery use is an average of one funeral per day with 10 vehicles lasting an average of one hour. This is based on a projected use of 250 interments per year, an average of one funeral per day. The increase would not significantly impact the traffic on Clarendon Street compared the Crown Hill Cemetery traffic.

Construction related activities under the Proposed Action would result in a short-term adverse impact to the transportation network in the immediate cemetery vicinity. During construction, an increase in the number of vehicles (including trucks and personal vehicles) would occur. Construction related activities could be scheduled to avoid local impacts during peak travel times. The Proposed Action would construct a new entrance, additional roadway and parking area. Short-term adverse transportation impacts during construction could be minimized through construction scheduling.

No-Action Alternative

Under the No-Action Alternative, cemetery expansion would not occur and no impacts to transportation and parking would result.

4.18 Utilities

Existing Environment

The proposed project area is an undeveloped area with no current utilities.

Environmental Effects

Proposed Action

The Proposed Action includes the construction of a public restroom requiring connection to the existing city water and sewer systems. Connection to city electric and information technology service will also be necessary.

Utility usage would be minimal and would have no adverse impacts on utility suppliers. No off-site trenching is expected except at the property line for curbside waterline access.

No-Action Alternative

Under the No Action alternative, cemetery expansion would not occur and no additional use of utilities would result.

4.19 Vegetation and Wildlife

Existing Environment

The proposed property is an open field with approximately 20 trees. It appears to have remained undisturbed for a very long time.

A preliminary site visit was conducted on November 7, 2017. One isolated wetland and an unnamed drainage feature were documented in the project area. No state or federal protected plant or animal species were observed.

Federally Protected Species in Marion County, Indiana

Species	Habitat	Federal Status	State Status
Indiana Bat	Woodlands near riparian corridors, caves, and mines	Endangered	Endangered

There are no federal wilderness areas, wildlife refuges, or designated critical habitat within the project area or its vicinity.

Environmental Effects

Proposed Action

The United States Department of the Interior, US Fish and Wildlife Service (USFWS) and the Indiana Department of Natural Resources (IDNR) responded to the request for early coordination. USFWS confirmed that federally protected plant and animal species have not been documented within the proposed project location.

However, the summer roosting habitat for the federally protected Indiana Bat is present. The USFWS stated that the project will not eliminate enough habitat to affect the species, but to avoid incidental take, tree clearing should be avoided April 1 - September 30. If this temporary restriction is implemented, then USFWS concurs that the proposed project is not likely to adversely affect the species. IDNR requested to be contacted as a stakeholder for additional environmental review when detailed plans of the site design are available.

While the acquisition of the property will have no potential impact to wildlife, the proposed tree and vegetation removal will displace resident and migratory wildlife by decreasing the amount of

habitat available for nesting, foraging, and cover. The tree removal will occur during October 1 to March 30 to avoid the nesting of the Indiana Bat.

The Proposed Action is within an undisturbed open field that is similar to an operational cemetery grounds. While the Proposed Action will have a minimal impact to wildlife, the impacts can be minimized and mitigated by following the IDNR recommendations.

No-Action Alternative

Under the No Action alternative, cemetery expansion would not occur and no impacts to wildlife and habitat would result.

5.0 SOURCES

Agency and Tribal Coordination

During development and review of the EA for expansion of the Crown Hill National Cemetery, NGA contacted federal state, and local agencies with oversight responsibilities related to this project. The table below lists the coordination and consultation activities conducted to date in support of this EA.

Agency and Tribal Coordination for Expansion and Improvements at Crown Hill Cemetery

Entity	Coordination and Input
Field Supervisor US Fish and Wildlife Service Bloomington Field Office 620 South Walker Street Bloomington, IN 47403-2121	Early coordination between the VA and FWS has been completed. The FWS response, dated December 27, 2013, stated that providing no tree removal takes place between April 1 – September 30 the proposed action is not likely to adversely affect the Indiana bat or Northern long-eared bat. Further coordination with FWS under Section 7 of the Endangered Species Act is unnecessary unless new occurrences of federally protected species are found on site or if the scope of the proposed project changes significantly.
USDA Natural Resources Conservation Service State Conservationist 6013 Lakeside Boulevard Indianapolis, IN 46278	VA and NRCS jointly completed a Farmland Conversion Impact Rating Form (Form CPA-106) that assigned a relative value and site assessment value of 0. Awaiting confirmation of parcel land.
Ms. Christie Stanifer, Environmental Coordinator IDNR, Division of Fish & Wildlife 402 West Washington Street Room W264, IGC South Indianapolis, IN 46204	Coordination with IDNR was initiated on December 13, 2013. The IDNR response letter, dated January 14, 2014, stated that no protected plants or animals have been documented in the vicinity of the proposed project area. IDNR has requested to be contacted when more detailed site development plans are available for additional environmental review and comment.
Indiana Department of Environmental Management(IDEM) 100 North Senate Ave Indianapolis, IN 46204	Coordination with IDEM was initiated on November 7, 2017. The IDEM response dated November stated that an isolated wetland will require a permit. A327-15-5 a permit will be required for construction run-off
Department of the Army Chief, Environmental Resources Corps of Engineers Louisville District, ATTN: CEPMP-P-E P.O. Box 59	USACE responded to the early coordination request with a brief phone call in January 2013 to let us know that previous wetland delineations had been prepared for the site (and expired), and a new delineation and coordination would

<p>Louisville, Kentucky 40201-0059</p>	<p>be necessary for the proposed project. We are awaiting the new delineation letter from USACE.</p>
<p>Mitch Zoll, Director Indiana Department of Natural Resources Division of Historic Preservation and Archaeology 402 W. Washington Street, Room W274 Indianapolis, Indiana 46204</p>	<p>A letter reports pursuant to consultation required by Section 106 of the National Historic Preservation Act was sent on December 21, 2017 Presenting the assessment and findings and requesting SHPO concurrence with a conclusion of no adverse effect to historic properties as well as consulting party invitation. A letter that was dated January 22, 2018 states concurrence from Indiana SHPO regarding the development of Crown Hill.</p>
<p>Chris Myers, Preservation Planner Indianapolis Preservation Commission 1801 City-County Building 200 Washington Street Indianapolis, Indiana 46204</p>	<p>A letter reports pursuant to consultation required by Section 106 of the National Historic Preservation Act was sent on December 21,2017</p>
<p>Chad Lethig Indiana Landmarks-Central Regional Office 1201 Central Avenue Indianapolis, Indiana 46202</p>	<p>A letter reports pursuant to consultation required by Section 106 of the National Historic Preservation Act was sent on December 21,2017</p>
<p>David G. Vanderstel Marion County Historian 4415 Broadway Street Indianapolis, Indiana 46205-1847</p>	<p>A letter reports pursuant to consultation required by Section 106 of the National Historic Preservation Act was sent on December 21,2017</p>
<p>Carol A Hall, President Marion County Historical Society PO Box 2223 Indianapolis, Indiana 46206</p>	<p>A letter reports pursuant to consultation required by Section 106 of the National Historic Preservation Act was sent on December 21,2017</p>
<p>Anna Gremling, Executive Director Suite 1922, City-County Building 200 East Washington Street Indianapolis, Indiana 46204-3310</p>	<p>A letter reports pursuant to consultation required by Section 106 of the National Historic Preservation Act was sent on December 21,2017</p>
<p>Crown Hill Heritage Foundation 700 West 38th Street Indianapolis, Indiana 46208</p>	<p>A letter reports pursuant to consultation required by Section 106 of the National Historic Preservation Act was sent on December 21,2017</p>

Public Involvement

As stated in the VA's NEPA Interim Guidance for Projects (VA 2010), public involvement for an EA may include public engagement during scoping, and drafting, and finalizing the EA through publications of notices or public meetings.

The public involvement process will consist of the publication of a Notice of Availability of this Final EA. The public comments are listed in this Final EA under Section 11.

Public Review of Draft Environmental Assessment

The VA's NEPA guidance states that the EA process must include at least a 30-day public comment period on the Draft EA, which starts with the publication of a Notice of Availability (NOA). The NOA for this Final EA will be published when approved by VA.

Comments were received on the Draft EA. They are documented and considered in the Final EA. The comments and responses are located in Section 11.0.

6.0 BEST MANAGEMENT PRACTICES AND MONITORING

Best management practices, impact minimization techniques, and monitoring opportunities to maintain the impacts of the Proposed Action at acceptable levels are described below.

AESTHETICS

Short-term impacts could be minimized through implementation of the following:

- Conduct construction activities with a sensitivity toward maintaining the dignity and solemnity of the cemetery environment.
- Conduct construction activities during regular working hours, Monday - Friday, 8:00 a.m. - 5:00 p.m.

AIR QUALITY

Short-term air quality impacts could be minimized through implementation of the following:

- Use appropriate dust control methods during construction activities. Dust control methods include water sprays, chemical soil additives, and wheel washers.
- Suspend construction activities during periods of high winds.
- Reduce vehicle speeds to reduce dust generated by vehicles and equipment on unpaved surfaces.
- Quickly re-vegetate exposed soils following completion of construction activities.

GEOLOGY AND SOILS

Short-term erosion and sedimentation impacts could be minimized through implementation of the following:

- Design, install, and maintain erosion and sediment controls during the duration of construction activities and any subsequent soil disturbance activities near site drainages. Such controls may include silt fences, runoff control berms, erosion control fabric, and rip-rap.
- Minimize the amount of exposed soils at any given time during construction activities. Quickly re-vegetate disturbed areas following completion of activities.
- Minimize the disturbance of steep slopes.
- Provide an undisturbed natural buffer between the activity area and surface drainages, and direct storm water runoff to vegetated areas.
- Develop a Storm water Pollution Prevention Plan, consistent with the requirements of the NPDES general permit.
- Implement spill and leak prevention and response procedures.

HYDROLOGY AND WATER QUALITY

Short-term erosion and sedimentation impacts on hydrology and water quality could be minimized through implementation of the best management practices listed above for Geology and Soils. Additional impacts could be minimized through implementation of the following:

- Utilize native vegetation and drought-resistant vegetation for area landscaping to reduce irrigation requirements
- Route stormwater runoff from impervious surfaces to stormwater retention/drainage areas.
- Implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the project area, to reduce the impacts of incidental releases of vehicle fluids.
- Engage contractors or regulatory agencies in locating the new groundwater well to minimize impacts to other groundwater users.
- Continue responsible use of pesticides and road deicing chemicals, keeping usage to the lowest quantities possible thereby reducing the potential for water quality impacts.

WILDLIFE AND HABITAT

Potential impacts should be avoided by:

- Avoidance - Tree removals will not occur between April 1 and September 30 (USFWS).
- Cemetery operations in the future would include the responsible use of the NCA Integrated Pest Management Program, Pesticides and road deicing chemicals would be kept to the lowest quantities possible.

NOISE

Short-term and long-term noise impacts could be minimized through implementation of the following:

- Schedule construction activities for daylight hours, attempting to minimize impacts to nearby cemetery operations
- Maintain mufflers and sound shielding on construction equipment and routine maintenance equipment.
- Minimize equipment idling, and shut down construction equipment when not in use.

WETLANDS

Impacts to wetland areas from construction activities could be minimized through implementation of the following:

- Avoid wetland areas to the extent practicable.
- Establish new site drainages.

SOLID AND HAZARDOUS WASTE

Impacts involving hazardous wastes could be minimized through implementation of the following:

- Continue proper vehicle maintenance and inspection to reduce the potential for incidental releases of vehicle fluids.

TRANSPORTATION AND PARKING

Short-term transportation impacts during construction activities could be minimized through implementation of the following:

- Schedule construction activities such that traffic increases do not coincide with typical morning and evening periods of increase traffic.
- Route transportation of construction equipment to minimize impacts on neighboring communities.

7.0 PREPARERS

U. S. Department of Veterans Affairs

- Jill Schattel, Environmental Engineer, Office of Design and Construction
- Donald Campbell, Environmental Engineer, Office of Design and Construction

8.0 REFERENCES

ASC Group, Inc. June 2015. Waters of the U.S. and Wetland Delineation Report: Crown Hill National Cemetery Expansion Project, U.S. Department of Veterans Affairs, National Cemetery Administration, Indianapolis, IN.

EPA 1995. U.S. Environmental Protection Agency, AP-42, "Compilation of Air Pollutant Emission Factors", Section 13.2.3 "Heavy Construction Operations."

EPA 2014. U.S. Environmental Protection Agency website, "General Conformity, Basic Information." Available: <http://www.epa.gov/air/genconform/background.html>. Accessed June 2015.

Environmental Laboratory. 1987. *Corps of Engineers Wetland Delineation Manual*. Technical Report Y-87-1, US Army Engineer Waterways Experiment Station, Vicksburg, MS.

FEMA 2015. FEMA GeoPlatform. Federal Emergency Management Agency, U.S. Department of Homeland Security. <http://fema.maps.arcgis.com/home/index.html>. Accessed May 2015.

FHWA Noise Data, 2015: <http://www.fhwa.dot.gov/environmenUnoise/> IDEM Air Quality Data, 2015: <http://www.in.gov/idem/airquality/index.htm>

Indianapolis Metropolitan Planning Organization, 2015. Air Quality Conformity Data <http://www.indympo.org/Pages/home.aspx>

Indianapolis Metropolitan Planning Organization, 2015. Average Daily Traffic Map (ADT) <http://www.indympo.org/data/maps/pages/traffic-count-maps.aspx>

IndianaMap GIS Online Database. Maps showing infrastructure, generated December 2013. <http://maps.indiana.edu/>

NWS 2014. National Weather Service JetStream Online School for Weather. "Climate Subdivisions." Available: http://www.srh.noaa.gov/jetstream/global/climate_max.htm. Accessed June 2015.

SCAQMD 2014. Off-road Mobile Source Emission Factors (Scenario Years 2007 - 2025). South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/off-road-mobile-source-emission-factors>. Downloaded June, 2015.

USAGE. 2010. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region Version 2.0*. United States Army Engineer Research and Development Center. Vicksburg, MS. August 2010.

USDA, NRCS. 2015. Web Soil Survey Geographic Database for Marion County, Indiana. US Department of Agriculture, Natural Resources Conservation Service. Fort Worth, Texas. <http://websoilsurvey.nrcs.usda.gov1app/HomePage.htm>, access in April, 2015.

USFWS 2015. Endangered species: Species search. U.S. Fish and Wildlife Service. Accessed December 2013 (follow-up May 2015): <http://www.fws.gov/endangered/regions/index.html#tabs-3>

VA 2014. *Draft CATEX for the Crown Hill - VA Cemetery Expansion Project*. U.S. Department of Veterans Affairs, Office of Facilities. February 2014

VA 2010. U.S. Department of Veterans Affairs Interim NEPA Guidance for Projects, PG- 18-17 (Rev.) September 30, 2010.

VA 2014a. *Facts About the National Cemetery Administration*. U.S. Department of Veterans Affairs, National Cemetery Administration. June 2015.

SECTION 9.0 POTENTIAL STAKEHOLDERS

Potential Stakeholders and Tribal Contacts Urban Initiative - Crown Hill National Cemetery Land Acquisition

City of Indianapolis
ATTN: William A. Browne, Jr., FAIA President
Historic Preservation Commission 200 E. Washington St. Indianapolis IN 46204

Marsh Davis President
Indiana Landmarks 1201 Central Avenue Indianapolis IN 46202

David S. Evans Chair
Indiana Historical Society 450 West Ohio Street Indianapolis IN 46202

Jason Ross
Section 106 Manager Delaware Nation, Oklahoma 31064 State Highway 281 Building 100
Anadarko OK 73005

Diane Hunter
Acting Tribal Historic Preservation Officer Miami Tribe of Oklahoma 3410 P Street
Miami, OK 74354

William Tarrant
Tribal Historic Preservation Officer Seneca Cayuga Tribe of Oklahoma 23701 S. 655 Road Grove,
OK 74344

SECTION 10.0 PUBLIC INVOLVEMENT

Public Comments received by mail

1. Comments 1 and 8 - Relate to Storm water Concerns: Nowhere in the Draft EA is there recognition nor discussion of existing on-site drainage basin with series of storm water drainage sewers throughout the drainage basin. There is no mention of a contoured grass covered drainage basin with series of storm water sewers.

NCA Response: Army Corps of Engineers will provide the design to address all storm water issues.

2. Comment 2- Shows different Proposed Exchange Site west boundaries and types of invasive plant species.

NCA Response: The Office of Real Property for Veteran Affairs will record the deed of the land acquisition in the city of Indianapolis, Indiana. The deed will have appropriate boundaries. The Army Corps of Engineers will be following the guidelines for plants and trees set by the State of Indiana.

3. **Comment 3** - Expect use of restrooms by public to cause general problems.

NCA Response: Restrooms will be available during normal operating hours of the new National Cemetery. The new national cemetery will follow established procedures on daily operations and maintenance.

4. **Comment 4** - There is need for the construction of a Utility Storage Building.

NCA Response: The Army Corps of Engineers will follow NCA design of the Urban Initiative for Columbarium.

5. **Comment 5** - There is a need to anticipate and plan management of increased storm water runoff from impervious areas by Best Management Practices, etc.

NCA Response: The Army Corps of Engineers will follow Storm Water Best Management Practices in accordance with the EPA, state and local regulations of Storm Water.

6. **Comment 6** - It is imperative that NCA site plans include water source points.

NCA Response: The Army Corps of Engineers will follow NCA standard design for urban initiative.

7. **Comment 7** - State of Wisconsin has an extensive cemetery donation program to include individuals and/or families being able to donate flag poles within the Avenue of Flags.

NCA Response: NCA has a process in place for accepting deceased veteran's flags for the Avenue of Flags. Please see the NCA website at www.benefits.va.gov/warms/docs/admin21/m21_1/mr/part7/ch05/m21-1vii_5_secb.doc

8. **Comment 8** - Relate to Storm Water Concerns see NCA response in Comment 1.

9. **Comment 9** - Site Selection, Extending Stakeholders and Requesting Crown Hill Master Plan.

NCA Response: NCA does not own the wooded parcel. It will be exchanged for the new parcel during the land acquisition with Crown Hill Cemetery. Your comment has been noted for stakeholder expansion. The master plan for Crown Hill Cemetery is for a private cemetery. NCA master plan is for the Urban Initiative Columbarium.

Comments at the Public Meeting held at Indian War Memorial on January 23, 2018.

- **Comment 1-**

Speaker 1

Gary Moody - Indiana Forestry Alliance

Drainage from forested area and open area flows into combined city sewer (sanitary and storm water)

Recommend using best practices - permeable paving, bio-swales, keep existing trees, maintain trees on west property line ("nice trees")

Indiana Forestry Alliance will continue to support the acquisition of the wooded parcel for protection in perpetuity

Recommend using serene wooded area for scatter garden

NCA Response: Army Corps of Engineers will provide the design to address all storm water issues. The Army Corps of Engineers will be following the federal EPA regulations, state and local regulations for storm water. NCA will not own the wooded parcel it will be exchanged for the new parcel for land acquisition with Crown Hill Cemetery.

- **Comment 2**

Speaker2

Jerome Delbridge Indiana Forestry Alliance

Read prepared statement and handed off to John Kays Encouraged maintaining ecology/hydrology of wooded site Recommended expanding stakeholders

NCA Response: The wooded parcel will be exchanged for the flat open field parcel during land acquisition with Crown Hill Cemetery. Your comment has been noted for stakeholder expansion.

- **Comment 3**

Speaker3

Did not introduce himself - Indiana Forestry Alliance Read prepared statement and handed off to J.K.

Encouraged the retention of tree canopy on the west side. Canopy is over property line but trunks are not on NGA property.

Noted it was important for NGA to explain who other sites recommended by local organizations were not considered suitable.

Gentlemen concurred with Draft Environment Assessment

NCA Response: The wooded parcel will be exchanged for the flat open field parcel during the land acquisition with Crown Hill Cemetery. The other sites are in the executive summary of this environmental assessment.

- **Comment4**

Speaker 4 Denise Suthca

Daughter of Purple Heart Veteran

Noted concerns of the aesthetic perspective of the renderings shown. Encouraged paying attention to the serene nature of the site. Expressed concerns about "white sidewalks, white buildings, white columbaria"

Suggested engaging an artist to improve aesthetics and renderings.

NCA Response: Your comment has been noted for the aesthetic perspective.

- **Comment 5**

Speaker 5

Did not introduce himself - Alliance of Crown Hill Neighbors

Echoed comments on aesthetics -concerned about large amount of hardscapes -suggested setbacks as shown with buffer strips were good and would reduce impacts to adjacent residential neighborhoods

Encouraged NCA to obtain a copy of Crown Hill's master plan which is not a public document

NCA Response: NCA master plan will address the planting and care of the landscape. Crown Hill's Master Plan does not affect NCA Master Plan of the site.

- **Comment 6**

Speaker 6

Ken Kemp - self representative

Background in forestry management, watershed/wetlands management. 8 years with Indiana Department of Natural Resources. Concerned about the sediment run-off from the current private Crown Hill Cemetery operations. There is a small tributary that runs through the wooded area.

1.1"of rainfall over a 3 hour period results in a discharge that ponds in the upper left corner of the open parcel. Additional rainfall causes an area farther south to pond on the open field. The open space has been converted into a "big swale" with underground drainage, without this system, the proposed NCA site would flood. Study should be done to "see where the water goes".

NCA Response: Army Corp of Engineers will provide the design to address all storm water -issues. The Army Corp of Engineers will be following the federal EPA regulations, state and local regulations for storm water.

- **Comment 7**

Speaker 7

Laurie Perdue -USAF Vet - involved in advocacy effort Appreciated NCAs work to save North Woods

NCA Response: Thank you

APPENDIX A STATE HISTORIC PRESERVATION OFFICE LETTER

Division of Historic Preservation & Archaeology-402 W. Washington Street, W274 Indianapolis, IN 46204-2739
Phone 317-232-1646-Fax 317-232-0693 dhpa@dnr.IN.gov



January 22, 2018

W. Edward Hooker, III
Historic Architect
Department of Veterans Affairs
National Cemetery Administration
Design and Construction Service
Washington, DC 20420

Federal Agency: Department of Veterans Affairs, National Cemetery Administration

Re: Project information and the Department of Veteran Affairs' finding of "no adverse effect" concerning the acquisition and development of 10 acres of land within Crown Hill Cemetery at W. 42nd Street and Clarendon Road (Indianapolis Columbarium Annex to Marion National Cemetery/ Indianapolis Urban Initiative Project # 817CM3020; DHPA #22013)

Dear Mr. Hooker:

Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) and 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has conducted an analysis of the materials dated December 21, 2017 and received on December 27, 2017, for the above indicated project in Indianapolis, Washington Township, Marion County, Indiana.

We concur with the Department of Veterans Affairs' December 21, 2017 finding that there are no historic buildings, structures, districts, objects, or archaeological resources within the area of potential effects that will be adversely affected by the above indicated project.

This identification is subject to the following condition:

- The project activities remain within areas disturbed by previous construction. If there would be portions of the proposed project area which have not been disturbed by the following, then archaeological investigation would be needed in those areas: installation of past preliminary infrastructure, installation of storm drains and drain pipe prior to 1995. The survey would have to be completed in accordance with the "Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation" (48 F.R. 44716).

If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and 29) requires that the discovery must be reported to the Department of Natural Resources within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and 29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. 800.

Please note the following in state statute (Indiana Code 14-21-1-26.5, http://iga.in.gov/static-documents/0/8/8/4/0884a8f0/TITLE14_AR21_ch1.pdf) regarding proposed ground disturbance within 100 feet of a cemetery:

(d) A development plan for a governmental entity to disturb ground within one hundred (100) feet of a burial ground must be approved as follows:

(1) A development plan of a municipality requires approval of the executive of the municipality and does not require the approval of the department. However, if the burial ground or cemetery is located outside the municipality, approval is also required by the executive of the county where the burial ground or cemetery is located. A county cemetery commission established under IC 23-14-67-2 may advise the executive of the municipality on whether to approve a development plan.

(2) A development plan of a governmental entity other than:

(A) a municipality; or

(B) the state;

requires the approval of the executive of the county where the governmental entity is located and does not require the approval of the department. However, if the governmental entity is located in more than one (1) county, only the approval of the executive of the county where the burial ground or cemetery is located is required. A county cemetery commission established under IC 23-14-67-2 may advise the county executive on whether to approve a development plan.

If you have questions about archaeological issues please contact Amy Johnson at (317) 232-6982 or ajohnson@dnr.IN.gov. If you have questions about buildings or structures please contact Chad Slider at (317) 234-5366 or cslider@dnr.IN.gov.

Very truly yours,



Mitchell K. Zoll

Deputy State Historic Preservation Officer

APPENDIX B

PHOTOGRAPHS

