DRAFT ENVIRONMENTAL ASSESSMENT

LAND ACQUISITION

CROWN HILL NATIONAL CEMETERY

CROWN HILL NATIONAL CEMETERY
700 WEST 38TH STREET
INDIANAPOLIS, INDIANA
MARION COUNTY

JANUARY 2018
ABSTRACT: The Department of Veterans Affairs (VA) operates Crown Hill National Cemetery, located in Indianapolis, Indiana. The National Cemetery Administration is acquiring 14.75 acres to expand Crown Hill National Cemetery to the next century. The VA National Cemetery Administration would be responsible for continued maintenance and operation of the cemetery.

The property to be acquired is within the surrounding Crown Hill Cemetery, in the northeast corner. The Crown Hill National Cemetery is in the southern corner. It will provide VA expansion of Crown Hill National Cemetery. The initial construction phase (Phase 1) will provide a 10 year capacity of 2,500 Columbarium Urn Niches. Phases 2-10 will eventually develop a 100+ 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 parcel within the surrounding Crown Hill Cemetery.

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

Proposed Action

The proposed cemetery project would create a formal entrance and roadway system to accommodate the construction of columbarium walls, a main flagpole area, a committal shelter, and 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 virtually impossible 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 the needs of Veterans.

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, 38.6 percent of NCA burials were cremations and that number increased to 51.8 percent in 2014. These findings and the actual 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 social, economic, and environmental negative 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 Draft EA:

- Informs the public of the possible environmental impacts of the Proposed Action and its considered alternatives, as well as methods to reduce these effects
- 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

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 effects.

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 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. 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 Draft 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 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 VA NEPA checklist found in the VA’s Environmental Compliance Manual is the primary reference, with 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. Coordination with the State Historic Preservation Office is 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.

Environmental Consequences

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.

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

**No Action**

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 between 18°C/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 between 31°C/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 58 cm / 23 inches.

The city's average annual precipitation is 102 cm / 40 inches. The average July high is 86°F (30°C), with the low being 61°F (16°C). January highs average 34°F (1°C), and lows 18°F (-8°C). The record high for Indianapolis is 104.0°F (40°C), on July 14th, 1954. The record low is -27°F (-33°C), on January 19th, 1994. Snowfall varies from about 20 to 30 inches (500-760 mm) 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 (PM2.5). 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.
<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Primary/ Secondary</th>
<th>Averaging Time</th>
<th>Level</th>
<th>Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon monoxide</td>
<td>primary</td>
<td>8-hour</td>
<td>9 ppm</td>
<td>Not to be exceeded more than once per year</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1-hour</td>
<td>35 ppm</td>
<td>Not to be exceeded more than once per year</td>
</tr>
<tr>
<td>Lead</td>
<td>primary and secondary</td>
<td>rolling 3-month average</td>
<td>3 1</td>
<td>Not to be exceeded</td>
</tr>
<tr>
<td>Nitrogen dioxide</td>
<td>primary and secondary</td>
<td>1-hour</td>
<td>100 ppb</td>
<td>98th percentile of 1-hour daily maximum concentrations, averaged over 3 years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>annual</td>
<td>53 ppb$^2$</td>
<td>Annual mean</td>
</tr>
<tr>
<td>Ozone</td>
<td>primary and secondary</td>
<td>8-hour</td>
<td>3</td>
<td>Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>primary</td>
<td>annual</td>
<td>12 µg/m$^3$</td>
<td>Annual mean, averaged over 3 years</td>
</tr>
<tr>
<td></td>
<td>secondary</td>
<td>annual</td>
<td>12 µg/m$^3$</td>
<td>Annual mean, averaged over 3 years</td>
</tr>
<tr>
<td></td>
<td>primary and secondary</td>
<td>24-hour</td>
<td>35 µg/m$^3$</td>
<td>98th percentile, averaged over 3 years</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>primary and secondary</td>
<td>24-hour</td>
<td>150 µg/m$^3$</td>
<td>Not to be exceeded more than once per year on average over 3 years</td>
</tr>
<tr>
<td>Sulfur dioxide</td>
<td>primary</td>
<td>1-hour</td>
<td>75 ppb$^4$</td>
<td>99th percentile of 1-hour daily maximum concentrations, averaged over 3 years</td>
</tr>
<tr>
<td></td>
<td>secondary</td>
<td>2-hour</td>
<td>0.5 ppm</td>
<td>Not to be exceeded more than once per year</td>
</tr>
<tr>
<td>Pollutant</td>
<td>Primary/Secondary</td>
<td>Averaging Time</td>
<td>Level</td>
<td>Form</td>
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</tbody>
</table>

Sources: 40 CFR 50, OAC 3745-25-02

1 Final rule signed October 15, 2008. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the previous standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

2 The official level of the annual nitrogen dioxide standard is 0.053 ppm, equal to 53 ppb, which is shown here for the purpose of clearer comparison to the 1-hour standard.

3 Final rule signed March 12, 2008. The 1997 ozone standard (0.08 ppm, annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years) and related implementation rules remain in place. In 1997, EPA revoked the 1-hour ozone standard (0.12 ppm, not to be exceeded more than once per year) in all areas, although some areas have continued obligations under that standard (“anti-backsliding”). The 1-hour ozone standard is attained when the expected number of days per calendar year with maximum hourly average concentrations above 0.12 ppm is less than or equal to 1.

4 Final rule signed June 2, 2010. The 1971 annual and 24-hour SO₂ standards were revoked in that same rulemaking. However, these standards remain in effect until one year after an area is designated for the 2010 standard, except in areas designated nonattainment for the 1971 standards, where the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standard are approved.

ppb = parts per billion; ppm = parts per million; µg/m³ = micrograms per cubic meter

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 DVR 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

<table>
<thead>
<tr>
<th>Area Designation</th>
<th>Pollutant</th>
<th>Precursor</th>
<th><em>de minimis</em> level (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>All SO2 nonattainment areas</td>
<td>SO$_2$</td>
<td>none</td>
<td>100</td>
</tr>
<tr>
<td>All lead nonattainment areas</td>
<td>Lead</td>
<td>none</td>
<td>25</td>
</tr>
<tr>
<td>Ozone nonattainment areas outside an ozone transport region</td>
<td>ozone</td>
<td>VOC or nitrogen oxides</td>
<td>100</td>
</tr>
</tbody>
</table>

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 .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 Consequences

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 (O$_3$), 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 O$_3$, 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. Still, 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>
<thead>
<tr>
<th>Total Area (acres)</th>
<th>Exposed Area (acres)</th>
<th>Construction Duration (months)</th>
<th>Emission Factor (tons/acre/month)</th>
<th>Control Efficiency (%)</th>
<th>Total Suspended Particulate Emissions (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>14.75</td>
<td>14.75</td>
<td>2</td>
<td>1.2</td>
<td>80</td>
<td>14.4</td>
</tr>
</tbody>
</table>


Non-road construction vehicles would emit less than significant amounts of SO$_2$ 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 SOx, lead, NOx, and VOCs are below de minimis thresholds; therefore, conformity determinations are not required.

<table>
<thead>
<tr>
<th>Criteria Pollutant (^2)</th>
<th>SO(_x)</th>
<th>NO(_x)</th>
<th>Estimated Emissions (^1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emissions (tons)</td>
<td>0.0015</td>
<td>1.0954</td>
<td>0.1440</td>
</tr>
<tr>
<td>de minimis level (tons/year)</td>
<td>100</td>
<td>100</td>
<td>100</td>
</tr>
</tbody>
</table>

\(^1\) 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.

Environmental Consequences

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, Carbon Monoxide, and Fine Particulate Matter. 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 Ozone, Carbon Monoxide, and Fine Particulate Matter 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.

No Action

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 Consequences

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 expansion of burial areas at the national cemetery.

No Action

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 ¼ of the SW ¼ 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.

Section 106 Environmental Consequences

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

No adverse effect. Since the proposed parcel to be acquired and developed is not within or immediately adjacent to the existing Crown Hill National Cemetery, it would result in a finding of no adverse effect to the existing NRHP Crown Hill cemetery property. A letter requesting concurrence of the finding of no adverse effect was sent to the Indiana State Historic Preservation Office, State Historic Preservation Officer, and NCA expects to receive a favorable response.

No Action

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 Consequences

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**

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

### 4.8 Floodplains, Wetlands, and Coastal Zone Management 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. The Proposed Action is not within any flood hazard zone mapped by the Federal Emergency Management Agency (FEMA).

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. The wetland delineation was done in 2015 for the previous parcel which is adjacent to the new piece of land acquisition. The new land property has the cusp (the mouth) flowing into the land acquisition, therefore the wetland delineation completed in 2015 is relevant. IDEM has already visited the site on November 7, 2017 and has given NCA the requirements and recommendations for this isolated wetland cusp on 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 Consequences**

**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**

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

### 4.9 Geology and Soils

**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 on the west and east sides of the proposed parcel. Site drainage is moderate as there are some areas of water retention and one isolated forested wetland present.

Figure 3-1 shows the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS) National Cooperative Soil Survey for the cemetery project. Table 3-5 presents the acreages associated with each soil type.

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

#### Table 5 Crown Hill Cemetery Soils

<table>
<thead>
<tr>
<th>Soil Map Unit</th>
<th>Soil Name</th>
<th>Acres</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>MmA</td>
<td>Miami Silt Loam (0-2 percent slopes)</td>
<td>7.25</td>
<td>49</td>
</tr>
<tr>
<td>MmB2</td>
<td>Miami Silt Loam (2-6 percent slopes)</td>
<td>7.50</td>
<td>51</td>
</tr>
</tbody>
</table>

**Environmental Consequences**

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

**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. 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 adverse erosion and sedimentation impacts would be possible during both the construction and operational phases 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. Temporary increases in sedimentation in stormwater drainages could occur as a result of surface runoff erosion.

The early coordination response from NRCS state that no prime or unique farmland would be converted from the cemetery expansion project.

Minor short-term adverse erosion and sedimentation impacts could be minimized through implementation of construction Best Management Practices and conformance with EPA National Pollutant Discharge Elimination System (NPDES) permit requirements.

A general stormwater permit from Indiana Department of Environmental Management will be obtained.

**No Action**

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

**4.10 Hydrology and Water Quality**

**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. There is also a large wetland complex outside of the proposed parcel, immediately adjacent to the west. The site is generally flat with gradual sloping on the west and east perimeter of the parcel. Site drainage is moderate with areas of water retention.

**Environmental Consequences**

Surface water would not be significantly impacted by cemetery construction and operations. However, it is anticipated than an insignificant increase in surface water runoff can be expected. Restroom facilities to be constructed 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.

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

Under No Action, 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 Crown Hill National Cemetery is in the southern portion of the private cemetery. The Proposed Action property is in the northeast corner of the 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 Consequences

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

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

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 Consequences

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 rifle salute performed monthly). Rifle salutes typically consist of three to five rifles. Rifle salutes, based on firing rifle blanks, create a sound level of 80 dBA according to VA (VA 2014b). These sound levels correspond to firing directly at the receptor (0 degrees) and do not account for sound shielding from tree lines, berms, and other buffers; thus, actual sound levels are expected to be lower than those shown. For comparison purposes, speech ranges from 50 to 80 dBA, and area background sound levels were measured between 48 and 62 dBA. As such, noise from ceremonial rifle salutes is a minor contributor to overall sound levels.

Proposed Action

The Proposed Action, parcel acquisition would not result in minor, intermittent, 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
Under No Action, 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 decided to look for 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 open field was selected instead of the wooded forest parcel.

National Cemetery Administration is exchanging the 14.75 acre wooded forest parcel with Crown Hill Cemetery for an 14.75 acre open field parcel which is located in the northeast corner of the gated fenced Crown Hill Cemetery.

Environmental Consequences

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
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.

The draft EA will be made available for additional public comment and a public meeting will be held on January 23, 2018 at 6:00pm in the Indiana World War Memorial.

Because the Proposed Action is a cemetery-use within the Crown Hill Cemetery property boundary, it is unlikely to generate substantial controversy.

**No-Action**
Under No Action, 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 Consequences**

**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**

Under No Action, 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 Consequences

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

Under No Action, 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 to it.
Environmental Consequences

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 to overall solid waste generation in the region and would not result in adverse impacts. Staging and operation of construction equipment carries an increased potential for incidental releases of vehicle fluids. Proper vehicle maintenance and inspection would reduce this potential, and adverse impacts are not expected.

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. Excess excavated soils would not be an issue during burials as there are no in-ground burial sites proposed. 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.

Cemetery operations under the Proposed Action would generate minimal amounts of solid waste and would be a minor contributor to overall solid waste generation in the area 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

Under No Action, 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 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 cemetery property. Individuals and small groups of runners, bikers, and walkers use roadways within the cemetery grounds.

Environmental Consequences

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.

Proposed Action

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. This minimization opportunity is described in Section 5.0.

No Action

Under No Action, 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 Consequences

Proposed Action
The Proposed Action includes the construction of a public restroom which will require 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 insignificant compared to regional utility usage and would not have adverse impacts on utility suppliers.

No Action
Under No Action, cemetery expansion would not occur and no impacts to 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

<table>
<thead>
<tr>
<th>Species</th>
<th>Habitat</th>
<th>Federal Status</th>
<th>State Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indiana Bat</td>
<td>Woodlands near riparian corridors, caves, and mines</td>
<td>Endangered</td>
<td>Endangered</td>
</tr>
<tr>
<td>Northern Long-eared Bat</td>
<td>Woodlands near riparian corridors, caves, and mines</td>
<td>Threatened</td>
<td>Threatened</td>
</tr>
</tbody>
</table>

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

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 and Northern Long-eared 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 provided additional avoidance, minimization, and mitigation recommendations detailed in Section 5.0. 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. Crown Hill Cemetery is a 555 acre fenced private cemetery.

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 and Best Management Practices detailed Section 5.0.

No Action

Under No Action, 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, NCA contacted federal state, and local agencies with oversight responsibilities related to this project. Table 5-1 lists the coordination and consultation activities conducted to date in support of this EA.
### Table 1 Agency and Tribal Coordination for Expansion and Improvements at Crown Hill Cemetery

<table>
<thead>
<tr>
<th>Entity</th>
<th>Coordination and Input</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Field Supervisor</strong>  &lt;br&gt; US Fish and Wildlife Service  &lt;br&gt; Bloomington Field Office  &lt;br&gt; 620 South Walker Street  &lt;br&gt; Bloomington, IN 47403-2121</td>
<td>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.</td>
</tr>
<tr>
<td><strong>State Conservationist</strong>  &lt;br&gt; Natural Resources Conservation Service  &lt;br&gt; 6013 Lakeside Boulevard  &lt;br&gt; Indianapolis, IN 46278</td>
<td>VA and NRCS jointly completed a Farmland Conversion Impact Rating Form (Form CPA-106) that assigned a relative value and site assessment score of 0. Awaiting Confirmation on parcel land.</td>
</tr>
<tr>
<td><strong>Ms. Christie Stanifer, Environmental Coordinator</strong>  &lt;br&gt; IDNR, Division of Fish &amp; Wildlife  &lt;br&gt; 402 West Washington Street  &lt;br&gt; Room W264, IGC South  &lt;br&gt; Indianapolis, IN 46204</td>
<td>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.</td>
</tr>
<tr>
<td><strong>Indiana Department of Environmental Management</strong>  &lt;br&gt; <a href="http://www.in.gov/idem/enviroreview/hwy_ear">http://www.in.gov/idem/enviroreview/hwy_ear</a> Survey Info</td>
<td>Coordination with IDEM was initiated on November 7, 2017. The IDEM response, dated November 7, 2017, stated that an isolated wetland will require a permit. According to IAC 327-15-5 a permit will be required for construction run-off.</td>
</tr>
<tr>
<td><strong>Chief, Environmental Resources Department of the Army</strong>  &lt;br&gt; Louisville District, Corps of Engineers  &lt;br&gt; ATTN: CEPMP-P-E  &lt;br&gt; P.O. Box 59  &lt;br&gt; Louisville, Kentucky 40201-0059</td>
<td>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 be necessary for the proposed project. We are awaiting the new delineation letter from USACE.</td>
</tr>
<tr>
<td>Entity</td>
<td>Coordination and Input</td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Mitch Zoll, Director</td>
<td></td>
</tr>
<tr>
<td>Indiana Department of Natural Resources</td>
<td></td>
</tr>
<tr>
<td>Division of Historic Preservation and Archaeology</td>
<td></td>
</tr>
<tr>
<td>402 W. Washington St., Room W274</td>
<td></td>
</tr>
<tr>
<td>Indianapolis, Indiana  46204</td>
<td></td>
</tr>
<tr>
<td>Chris Myers, Preservation Planner</td>
<td></td>
</tr>
<tr>
<td>Indianapolis Historic Preservation Commission</td>
<td></td>
</tr>
<tr>
<td>1801 City-County Building</td>
<td></td>
</tr>
<tr>
<td>200 East Washington Street</td>
<td></td>
</tr>
<tr>
<td>Indianapolis, Indiana  46204</td>
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<td>Chad Lethig</td>
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<td>Carol A. Hall, President</td>
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**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.
To date, the VA has indicated that the public involvement process will consist of the publication of a Notice of Availability of this Draft EA. The process will continue with a public meeting on January 23, 2018 at 6:00pm in the Indiana World War Memorial in Indianapolis, Indiana. The process will continue with a public comment period on the Draft EA and consideration of public comments in the Final EA.

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 Draft EA will be published when approved by VA.

Any comments received on this Draft EA will be documented and considered in the Final EA.

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 stormwater runoff to vegetated areas.
• Develop a Stormwater 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 and 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 could be avoided, minimized, and mitigated by:

• Avoidance
  o Tree removals will not occur between April 1 and September 30 (USFWS).
  o Cemetery operations in the future would include the responsible use of pesticides and road deicing chemicals, keeping usage to the lowest quantities possible.
• Mitigation
  o Consider using native plants for any proposed on-site landscaping and tree planting.
  o Additionally, a native herbaceous seed mixture should be planted consisting of at least 10 species of grasses, sedges, and wildflowers.
selected from the IDNR Herbaceous Riparian Vegetation list or an approved equal.

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

8.0 REFERENCES


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


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


SECTION 9.0: PHOTOGRAPHS

Photograph 1- Crown Hill Land Parcel
Photograph 2 – Land Exchange Map – Showing the Current Land Owned by VA and the Proposed Exchange Land
Photograph 3 - Satellite view of Crown Hill Cemetery - Purple Box shows Acquisition Parcel on Satellite View

Photograph 4 - Birds eye view of Land Parcel
Photograph 5 - Crown Hill Land Parcel view from Clarendon Rd

Photograph 6 - Crown Hill Land Parcel view from Clarendon Rd
Photograph 7 - Typical Entrance View of Front Gate
Photograph 8 - Typical View of Public Information Center with Restrooms

Photograph 9 - Typical view of a Committal Shelter
Photograph 10 - Typical View of a Columbarium
SECTION 10.0 – POTENTIAL STAKEHOLDERS

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

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