

DRAFT

**SUPPLEMENTAL ENVIRONMENTAL
ASSESSMENT**

MASTER PLAN AND DESIGN

**CROWN HILL NATIONAL CEMETERY
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 expanding on 14.75 acres of property in the northeast corner of the adjacent Crown Hill Cemetery.

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 cemetery expansion.

Points of Contact:

Juan Kays, Program Manager
Department of Veteran Affairs
National Cemetery Administration
Design and Construction Service
425 Eye Street NW 5E425E
Washington DC 20001
(202) 632-5057
Juan.kays@va.gov

Jill Schattel, Environmental Engineer
Department of Veteran Affairs
National Cemetery Administration
Design and Construction Service
425 Eye Street NW 5E425P
Washington DC 20001
(202) 632-5221
jill.schattel@va.gov

TABLE OF CONTENTS	PAGE
ABSTRACT _____	2
EXECUTIVE SUMMARY _____	4
1.0 INTRODUCTION _____	4
1.1 PROJECT BACKGROUND _____	4
1.2 PURPOSE AND NEED _____	5
2.0 ALTERNATIVES _____	5
2.1 DEVELOPMENT OF ALTERNATIVES _____	5
2.2 ALTERNATIVES RETAINED FOR ANALYSIS _____	6
3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL EFFECTS _____	6
3.1 AESTHETICS _____	7
3.2 AIR QUALITY _____	8
3.3 COMMUNITY SERVICES _____	9
3.4 CULTURAL RESOURCES _____	10
3.5 CUMULATIVE IMPACTS _____	10
3.6 ENVIRONMENTAL JUSTICE _____	11
3.7 FLOODPLAINS, WETLANDS, AND COASTAL ZONE MANAGEMENT _____	12
3.8 GEOLOGY AND SOILS _____	13
3.9 HYDROLOGY AND WATER QUALITY _____	15
3.10 LAND USE _____	16
3.11 NOISE _____	16
3.12 POTENTIAL FOR GENERATING SUBSTANTIAL CONTROVERSY _____	17
3.13 SOCIOECONOMICS _____	19
3.14 SOLID AND HAZARDOUS MATERIALS _____	19
3.15 TRANSPORTATION AND PARKING _____	20
3.16 UTILITIES _____	21
3.17 WILDLIFE AND HABITAT _____	22
4.0 PUBLIC INVOLVEMENT _____	23
5.0 MITIGATION MEASURES _____	24
6.0 CONCLUSIONS _____	24
7.0 PREPARERS _____	24
8.0 POTENTIAL STAKEHOLDERS _____	24
APPENDICES _____	24
APPENDIX A	NATIVE AMERICAN INVOLVEMENT
APPENDIX B	AGENCY CONTACTS
APPENDIX C	PHOTOGRAPHS
APPENDIX D	REFERENCES
APPENDIX E	ENVIRONMENTAL DATA REPORTS (NETR)

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 has acquired 14.75-acres of property located in the northeast corner of the adjacent Crown Hill Cemetery, a private cemetery.

Proposed Action

The proposed action is to 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.

Environmental Evaluation

An Environmental Assessment (EA) was completed evaluating the effect of the cemetery expansion with a master plan to continue to provide burial options beyond 75 years.

Considerations included: aesthetics, air quality, community services, cultural resources, cumulative impacts, environmental justice, flood plains, wetlands, and coastal zone management, geology and soils, hydrology and water quality, land use, noise, potential for generating controversy, socioeconomics, solid and hazardous materials, transportation and parking, utilities, and wildlife and habitat.

Expansion of the existing Crown Hill National Cemetery on the 14.75-acres would have minimal effect on these areas.

1.0 INTRODUCTION

1.1 Project Background

History

Crown Hill National Cemetery is in Indianapolis, Indiana. The cemetery covers 2.5-acres and contains approximately 2,043 gravesites. The cemetery was purchased for the interment of remains of Union soldiers who died in general hospitals in Indianapolis and was originally buried in Greenlawn Cemetery.

Location

The National Cemetery Administration is expanding on 14.75 acres of property in Crown Hill Cemetery, a private cemetery in the northeast corner. The existing Crown Hill Cemetery is in the southeast corner of Crown Hill Cemetery, a private cemetery.

1.2 Purpose and Need

Purpose

The purpose of the proposed action is to 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.

Need

The Proposed Action is needed to continue to meet the NCA's goal of providing eligible Veterans with reasonable access to VA burial option within 75 miles of their home. This expansion would allow NCA to develop a columbarium 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 if 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 actual increase in families choosing cremation burials opened the possibility for VA to explore and implement the columbarium-only Urban Initiative.

2.0 ALTERNATIVES

2.1 Development of Alternatives

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 more than 50 miles

and over one- hour drive time to Marion National Cemetery for burials.

2.2 Alternatives Retained for Analysis

Preferred Alternative

Under the Proposed Action, the Crown Hill National Cemetery would be expanded and improved to extend burial operations through the 14.75-acre unwooded parcel located at in the northeast corner of Crown Hill Cemetery. The expansion of 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

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 expanding into 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.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL EFFECTS

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, cultural resources, cumulative impacts, environmental justice, flood plains, wetlands, and coastal zone management, geology and soils, hydrology and water quality, land use, noise, potential for generating controversy, socioeconomics, solid and hazardous materials, transportation and parking, utilities, and wildlife and habitat. These are all evaluated. Coordination with the State Historic Preservation Office is also completed.

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).

3.1 Aesthetics

Aesthetics refers to the visual resources including natural and man-made features that give a piece of property its aesthetic properties.

Existing Environment

The project site consists of undeveloped land within the existing property boundary of Crown Hill Cemetery, in a 14.75-acre 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. It was previously cleared, now overgrown with vegetation, with approximately 20 trees, with approximately three in poor condition.

Environmental Effects

Proposed Action Alternative

Under a Proposed Action Alternative, 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.

The design of the landscape will be in the preliminary design stage at 50% design point. It will be finalized at the 95% design stage. Additional trees are planned but the variety has not been selected.

NCA will follow the Best Management Practices for the Migrating Bird Act and cut down the trees during the appropriate season. The expansion design will be consistent with the appearance of the existing cemetery and other National Cemetery columbaria. See Appendix C for Photographs of Land Parcel.

No-Action Alternative

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

3.2 Air Quality

Air quality refers to the concentration of air contaminants in a specific location. Air quality is determined by the type and amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions. Impacts refer to changes in the air quality related to conditions caused by an action.

Existing Conditions

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 National Cemetery

Crown Hill National 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.

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.

Proposed Action Alternative

Under the proposed action alternative, the project would not increase Ozone, Carbon Monoxide, and Fine Particulate Matter emissions. 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 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.

Under the Proposed Action Alternative, any limited impact would be mitigated by annual emissions testing of all vehicles and equipment and industry practices for dust control.

No-Action Alternative

Under the No-Action Alternative there will be no change to the existing air quality.

3.3 Community Services

Community services refer to services provided by surrounding communities such as police, fire, and ambulance services, schools, health care, and parks and recreation.

Existing Environment

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

Environmental Effects

Proposed Action Alternative

Under the Proposed Action Alternative, 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 because of the expansion of burial areas at the national cemetery.

No-Action Alternative

Under the No-Action Alternative, there will be no additional impacts on community services. Existing services would continue to be provided.

3.4 Cultural Resources

Cultural resources include both historic and prehistoric archaeological resources, as well as historic structures. This impact analysis focuses 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

(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 Alternative

Under the Proposed Action, there is no adverse effect. Since the expansion and development of the property 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

Under the No-Action Alternative, the property would not be developed and no construction activity would occur therefore, there would be no impact to cultural resources.

3.5 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.

Findings

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 property 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.

3.6 Environmental Justice

Environmental justice refers to siting of projects in lower socioeconomic areas that might adversely affect the health of local residents.

Existing Environment

The existing Crown Hill National Cemetery is closed. The grounds are maintained through a private contract. 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.

Environmental Effects

Proposed Action Alternative

Under the Proposed Action Alternative, the 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.

3.7 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 Alternative

Under the proposed action alternative, the property will have no impact to this wetland. The design details are 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.

3.8 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 might be 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.

The NRCS National Cooperative Soil Survey for the cemetery project site, indicated that the soil on all of the site was Miami silt loam.

Environmental Effects

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

Proposed Action Alternative

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.

Soil Erosion

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. These could result of surface runoff erosion. Minor short-term erosion and sedimentation impacts would be minimized through implementation of construction Best Management Practices. These would be determined after the initial design has been completed.

The project will be designed to minimize adverse soil impacts during construction by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) in accordance the State of Indiana Rule 5 (NPDES Permit) and an erosion and sediment control plan completed as required by IDEP and EPA.

Depending on site conditions and construction expected the plan might 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, phasing construction to minimize exposed soil.

No Action Alternative

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

3.9 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 National Cemetery expansion 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 from the west and east perimeter of the property. Site drainage is moderate with a few 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 an onsite stormwater retention basin. Restroom facilities will be connected to the city water and sewer system. No negative impacts to groundwater or water quality are anticipated.

Proposed Action Alternative

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 a few areas of water retention.

There are existing stormwater 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 stormwater not retained in the cemetery will flow into the municipal storm water system.

It is anticipated that a slight increase in surface water runoff can be expected. The initial design calls for one stormwater detention basin. This will be addressed further in the design stage. Restroom facilities to be constructed will be connected to the city water and sewer system

The project will be designed to minimize adverse stormwater impacts during construction by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) in accordance the State of Indiana Rule 5 (NPDES Permit).

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.

Under the Proposed Action Alternative, the short-term erosion and sedimentation impacts associated with construction activities would be possible. 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.

Groundwater

Cemetery operations in 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 surface waters would be impacted by cemetery construction and operations.

No-Action Alternative

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

3.10 Land Use

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

It includes 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

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 Effects

Proposed Action Alternative

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 because of the Proposed Action.

No-Action Alternative

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

3.11 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 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).

Proposed Action Alternative

Under the Proposed Action Alternative, the expansion on the property, 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.

3.12 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 is for the expansion property 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. The property expansion 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 consists of the publication of a Notice of Availability of the Draft Supplemental EA on August 23, 2018, and will be holding a Public Meeting on September 6, 2018 in the Crown Hill Cemetery Events Room in Indianapolis, Indiana. Oral and written questions will be received. All questions will be considered in the Final Supplemental EA of the cemetery design.

Environmental Effects

Proposed Action Alternative

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 exchanged 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.

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 for Land Acquisition.

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

Under the Proposed Action Alternative, no controversy is expected as this is a property expansion for Crown Hill National Cemetery. 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 more than 50 miles and over one- hour drive time to Marion National Cemetery for burials.

No-Action Alternative

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

3.13 Socioeconomic

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

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

Existing Conditions

The area surrounding Crown Hill Cemetery contains residential and educational land uses, including the Indianapolis Canal and the White River, 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 expansion 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 Alternative

Under the Proposed Action Alternative, cemetery expansion of the property will allow the cemetery to continue to offer burial options for the foreseeable future with associated positive economic activity. No additional staffing is required as the contract operation would be extended to the new area.

No-Action Alternative

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

3.14 Solid and Hazardous Materials

The Solid and Hazardous Materials category refers to changes in the proper management of solid waste and hazardous materials in compliance with local, state, and Federal regulations

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 Effects

Proposed Action Alternative

Under the Proposed Action Alternative, construction related activities 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 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. 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 Alternative

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

3.15 Transportation and Parking

Existing Environment

Crown Hill Cemetery is 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 near 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 private cemetery grounds.

Environmental Effects

Proposed Action Alternative

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. This minimization opportunity is described in Section 5.0.

Under the Proposed Action Alternative, no additional traffic or parking would occur.

No-Action Alternative

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

3.16 Utilities

Existing Environment

The expansion property is an undeveloped area with no current utilities.

Environmental Effects

Proposed Action Alternative

Under the Proposed Action Alternative, would incorporate the expansion of the property into the existing cemetery and master design plan. When developed it be connected to the existing water and sewer systems. Connection to city electric and information technology service may also be necessary. Utility usage would be minimal.

No-Action Alternative

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

3.17 Wildlife and Habitat

Existing Environment

The expansion 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

Indiana bats, a federally endangered species, are found in woodlands near riparian corridors, caves, and mines. USFWS confirmed that federally protected plant and animal species have not been documented within the proposed project location.

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

Environmental Effects

Proposed Action Alternative

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 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.

The Proposed Action is within an undisturbed open field that is like 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 in Section 5.0.

Under the Proposed Action Alternative, no listed endangered species are likely to be found at this location. Contractor personnel will be made aware of the potential endangered species so they may notify cemetery personnel of any of their presence.

No Action Alternative

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

4.0 PUBLIC INVOLVEMENT

Under the VA's NEPA Interim Guidance for Projects (VA 2010), public involvement for an EA may include public engagement during scoping, 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 Draft EA. The public comments will be listed 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. Copies of the Final EA and FONSI are available for public review at Crown Hill Cemetery, Indianapolis Central Library, 40 East St Clair Street, Indianapolis, Indiana and the VA website: www.cem.va.gov/ea.asp

A Public Meeting will be held at the Crown Hill Cemetery Events Room on September 6, 2018, at 6:00pm. For further information please contact Juan Kays, NCA Program Manager, 425 I Street NW Washington DC 20001, Phone: (202) 632-5057. Email: Juan.Kays@va.gov

5.0 MITIGATION

No mitigation is required.

6.0 CONCLUSIONS

The expansion property of 14.75-acres 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.

Both an Environmental Site Assessment and a Cultural Resource Survey have been completed with no adverse effects identified related to the land acquisition.

7.0 PREPARERS

US Department of Veterans Affairs, National Cemetery Administration

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

8.0 POTENTIAL STAKEHOLDERS

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

8.2 Marsh Davis President
Indiana Landmarks
1201 Central Avenue
Indianapolis IN 46202

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

APPENDICES

APPENDIX A	NATIVE AMERICAN INVOLVEMENT
APPENDIX B	AGENCY CONTACTS
APPENDIX C	PHOTOGRAPHS
APPENDIX D	REFERENCES
APPENDIX E	ENVIRONMENTAL DATA REPORTS (NETR ONLINE)

APPENDIX A NATIVE AMERICAN INVOLVEMENT

Tribal Coordination

During development and review of the EA for expansion of the Crown Hill National Cemetery, NCA contacted Native American Tribes that might have had historical presence related to this location. Table 1 lists Tribal coordination and consultation activities conducted to date in support of this EA.

Table 1 Tribal Coordination for Expansion at Crown Hill National Cemetery

Entity	Coordination and Input
Jason Ross Section 106 Manager Delaware Nation, Oklahoma 31064 State Highway 281 Building 100okPO Box 1330 Anadarko, OK 73005	A letter reports pursuant to consultation required by Section 106 of the National Historic Preservation Act was sent on December 21,2017
Diane Hunter Acting Tribal Historic Preservation Officer Miami Tribe of Oklahoma 3410 P Street Miami, OK 74354	A letter reports pursuant to consultation required by Section 106 of the National Historic Preservation Act was sent on December 21,2017
William Tarrant Tribal Historic Preservation Officer Seneca Cayuga Tribe of Oklahoma 23701 S. 655 Road Grove, OK 74344	A letter reports pursuant to consultation required by Section 106 of the National Historic Preservation Act was sent on December 21,2017

APPENDIX B AGENCY CONTACTS
Agency Coordination

During development and review of the EA for expansion of the Crown Hill National Cemetery, NCA contacted these Agencies that might have had a presence related to this location. Table 1 lists Agency coordination and consultation activities conducted to date in support of this EA.

Table 1 Agency Coordination for Expansion at Crown Hill National Cemetery

Entity	Coordination and Input
City of Indianapolis ATTN: William A. Browne, Jr., FAIA President Historic Preservation Commission 200 E. Washington St. Indianapolis IN 46204	A letter reports pursuant to consultation required by Section 106 of the National Historic Preservation Act was sent on December 21,2017
Marsh Davis President Indiana Landmarks 1201 Central Avenue Indianapolis IN 46202	A letter reports pursuant to consultation required by Section 106 of the National Historic Preservation Act was sent on December 21,2017
David S. Evans Chair Indiana Historical Society 450 West Ohio Street Indianapolis IN 46202	A letter reports pursuant to consultation required by Section 106 of the National Historic Preservation Act was sent on December 21,2017

APPENDIX C PHOTOGRAPHS

Photograph 1- Aerial View of Crown Hill National Cemetery Expansion Parcel

Photograph 2- Satellite view of Crown Hill National Cemetery – Red Box shows Expansion Parcel

Photograph 3- Birds eye view of Expansion Land Parcel

Photograph 4 -Crown Hill Land Parcel view from Clarendon Rd

Photograph 5 - Crown Hill Land Parcel view from Clarendon Rd

Photograph 6- Master Plan Design of Expansion Property

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

APPENDIX D 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/environment/noise/> 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](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis%20handbook/off-road-mobile-source-emission-factors). Downloaded June, 2015.

USACE. 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.gov/app/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.

APPENDIX E

**NETR ONLINE
ENVIRONMENTAL TITLE REPORTS**