Figure 1. Aerial photograph depicting the existing Ohio Western Reserve National Cemetery property boundary and the proposed and alternative action areas.
Figure 2. Site plan for the proposed action.
Figure 3. Site plan for the alternative action.
Figure 4. Existing entrance to Ohio Western Reserve National Cemetery, located at the north end of the alternative action area, facing east.

Figure 5. Overview of existing grading within the proposed action area, facing north.
LEGEND

- Alternative Action
- Historic Architectural Resource Observed Near Project Area
- OAI Site
- OHI Site
- Project Area
- Proposed Action

Seville, OH 1961 (PR 1984, PI 1988)

Rittman, OH 1961 (Photorevised 1978)

Figure 6. Topographic map depicting the locations of previously recorded OAI and OHI sites within the APE.
Sites 33ME290–33ME303 consisted of one to four prehistoric lithic artifacts, none of which were diagnostic. Site size ranged from 1 to 100 square meters for these 14 sites. Nine of the 14 sites have isolated finds. None of these sites were deemed eligible for the National Register of Historic Places (NRHP). Site 33ME304 is the Shook site, an archaeological component associated with a standing structure. The site dimensions were given as 200 meters north–south by 100 meters east–west. Two shovel test pits were positive for artifacts at this location. Shovel Test 22 Level 1 yielded one piece of window glass and one piece of plain whiteware, while Shovel Test 27 Level 1 yielded one piece of asbestos siding, two pieces of coal, three brick fragments, one piece of window glass, one screwlid-type jar rim fragment, and two pieces of whiteware. Shovel Test 34 revealed a line of mortar 6 centimeters below the surface, running north–south; this line of mortar was traced for a length of 1.5 meters (5.0 feet) and was thought to be associated with a house foundation. Site 33ME305, the Hutchinson site, had an estimated area of 110 meters by 110 meters, with the western edge of the site situated along Rawiga Road. One positive shovel test pit produced one wire nail, one amber bottle glass fragment, four pieces of mortar, one piece of concrete, two brick fragments, and four pieces of buff stoneware, all from Level 1. This archaeological component was associated with a concrete block garage and the ruined remains of a barn. Site 33ME306, the Walker site, was assumed to be associated with an extant structure, but no shovel tests were excavated in the lawn surrounding the property as the house was occupied at the time of survey.

Sites 33ME0294 and 33ME0293, both unknown prehistoric sites, are located in the Proposed Action area. Site 33ME0305, a historic site; Site 33ME0291, an unknown prehistoric site; and Site 33ME304, the historic site associated with the Shook farmstead, are located within the alternative action area. As discussed during our onsite meeting on December 16, 2014, the original 1993 archaeological survey was adequate; it was accepted by the Ohio SHPO when it was submitted for review, and no further archaeological survey is required in connection with any part of this proposed project included in the original survey. Neither the Proposed Action nor the Alternative Action would affect archaeological resources that are eligible for listing in the NRHP.

**Historic Architectural Resources:**

The 1993 survey also noted standing structures in the project area associated with the historic archaeological sites mentioned above. These included a concrete block garage and ruined remains of a barn associated with the Hutchinson site; a late-nineteenth-century barn, two frame garages, and a corrugated steel silo associated with the Shook site; and a late-nineteenth-century house, barn, and shed associated with the Walker site. Of these, only the Shook barn, recorded for the Ohio Historic Inventory as MED0050317, was considered potentially significant for its architectural merits as a slate roofed barn. While the Hutchinson site and Shook barn previously were located in the Alternative Action area, all of the standing structures were demolished during the initial development of the national cemetery property.

Today the property functions as the Ohio Western Reserve National Cemetery. Although the cemetery is not 50 years of age, the National Park Service has determined that all national cemeteries are exceptionally significant places that are eligible for listing in the NRHP. Those portions of the national cemetery property that have been developed for cemetery purposes are considered contributing, while unimproved acreage is considered noncontributing (NPS 2011). Since the project is in keeping with NCA
design standards for national cemeteries, it would result in no adverse effect to the NRHP-eligible national cemetery property.

The area surrounding the national cemetery is characterized by a golf course to the south, wooded land to the east, twentieth-century residential development to the west, and agricultural development to the north and northwest. Notable among the twentieth-century houses in the vicinity, farmsteads likely dating to the nineteenth century were observed at 3700 and 3414 Seville Road, and a large barn was noted at 3030 Seville Road. Per guidance provided during our meeting, these properties were photographed but not formally evaluated for the current project. They represent common rural property types that define the surrounding area. The farmstead at 3414 Seville Road was previously recorded as MED0031017, the Lee Straub House. It features a New England one-and-a-half dwelling with vinyl siding and replacement windows, a secondary upright and wing dwelling with replacement exterior materials and multiple additions, and several barns and agricultural outbuildings of various vintages (Figures 7–9). The farmstead at 3700 Seville Road contains an upright and wing dwelling with vinyl siding and replacement windows and several barns and agricultural outbuildings of various vintages (Figures 10–11). The barn at 3030 Seville Road is a large raised basement barn with concrete foundation, vertical board walls, and metal panel roof (Figure 12). While the NRHP status of these properties is undetermined at this time, the proposed project would not affect any of the qualities of these sites for which they may be significant. As discussed during our meeting, the development of the Ohio Western Reserve National Cemetery in 1994–1995 was in keeping with the environmental setting of the surrounding area and had resulted in no adverse effect. Since the proposed expanded development of the cemetery property is located within the existing cemetery boundaries and in keeping with the original character and purpose of the site, it likewise poses no adverse effect to any historic properties that may be located within its viewshed or the surrounding area.

Thus, NCA finds that the development of the proposed project at Ohio Western Reserve National Cemetery will result in no adverse effect to historic properties. If you have any comments or require any additional information in order to concur with this finding, please contact me at (202) 632-5879 or Glenn.Elliott@va.gov.

Sincerely,

Glenn Elliott
Environmental Engineer
Office of Construction & Facilities Management
Figure 7. Primary residence associated with the farmstead at 3414 Seville Road (MED0031017), facing southeast.

Figure 8. Primary and secondary residences associated with the farmstead at 3414 Seville Road (MED0031017), facing southwest.
Figure 9. Outbuildings associated with the farmstead at 3414 Seville Road (MED0031017), facing south.

Figure 10. Overview of the farmstead at 3700 Seville Road, facing west.
Figure 11. Detail of the residence associated with the farmstead at 3700 Seville Road, facing west.

Figure 12. View of the barn at 3030 Seville Road, facing west.
References


April 3, 2015

Mr. Glenn M. Elliott, Environmental Engineer  
U.S. Department of Veterans Affairs  
Office of Construction & Facilities Management  
425 ‘Eye’ Street N.W., Room 6W417A  
Washington, D.C. 20001

Re: Capacity Expansion at the Ohio Western Reserve Cemetery  
Guilford Township, Medina County, Ohio

Dear Mr. Elliott,

This is in response to correspondence from your office dated January 26, 2015 (received January 29), regarding the above referenced project. The comments of the Ohio State Historic Preservation Office (SHPO) are submitted in accordance with provisions of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 [36 CFR 800]).

The undertaking will continue construction of cemetery facilities within the existing cemetery. SHPO reviewed this undertaking prior to the initiation of the construction of the cemetery in the 1990s. At that time an intensive archaeological survey was conducted and SHPO concurred that none of the identified archaeological sites was eligible for inclusion in the National Register. We also concurred that none of the standing architecture in the proposed cemetery was eligible for inclusion in the National Register. For the current proposed capacity expansion we agree that no additional archaeological survey is needed. Given the passage of twenty years and the potential that standing architecture could have achieved significance, we requested additional information on farm buildings from where the cemetery or the traffic to and from the cemetery would be in within the viewshed. The January 26, 2015, correspondence provides the additional requested information. Based on available information, we concur that there will be No Historic Properties Affected by this undertaking. No additional coordination with this office is necessary for this undertaking unless there is a change in the scope of work. In addition, if new or additional effects or historic properties are identified this office should be notified [36 CFR 800.13].

Any questions concerning this matter should be addressed to David Snyder at (614) 298-2000, between the hours of 8 am. to 5 pm. Thank you for your cooperation.

Sincerely,

David Snyder, Archaeology Reviews Manager  
Resource Protection and Review

DMS/ds (OHPO Serial Number: 1056890)

xc: Elizabeth G. Heavin (by email)
February 19, 2015

Tamara Francis-Fourkiller
Delaware Nation
Cultural Preservation Office
P.O. Box 825
Anadarko, OK 73005

Dear Ms. Francis-Fourkiller,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) is seeking to determine whether any historic properties may be affected by the proposed expansion and improvements to the existing Ohio Western Reserve National Cemetery in Medina County, Ohio. Although the cemetery is not 50 years of age, the National Park Service has determined that all national cemeteries are exceptionally significant places that are eligible for listing in the National Register of Historic Places. The entire national cemetery property was subject to previous investigation, coordinated with the Ohio State Historic Preservation Office (SHPO), prior to its initial development in 1994–1995. The proposed expansion project is located within the existing cemetery property boundary. During original cemetery development, this portion of the property was graded and roadways were added to serve future development needs. Based on the results of an investigation that we sponsored that was conducted by Cultural Resource Analysts, Inc., it is our tentative conclusion that our project will not have an adverse effect on any historic properties.

We would appreciate receiving your advice about any historic preservation or related issues you believe may be involved in our conduct of this undertaking. Attached for your reference and use is a description of the project and a summary of the cultural resources investigation.

In accordance with 36 CFR 800.4(d)(1)(i), we would appreciate receiving any comments in response to this letter and attachments within 30 days. If you have any comments or require any additional information in order to concur with this finding, please contact me at (202) 632-5879 or Glenn.Elliott@va.gov.

Sincerely,

Glenn Elliott
Environmental Engineer
Office of Construction & Facilities Management

Enclosure
February 19, 2015

Mr. Kenneth Meshiguad
Hannahville Indian Community
N14911 Hannahville B1 Rd.
Wilson, MI 49896-9728

Dear Mr. Meshiguad,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) is seeking to determine whether any historic properties may be affected by the proposed expansion and improvements to the existing Ohio Western Reserve National Cemetery in Medina County, Ohio. Although the cemetery is not 50 years of age, the National Park Service has determined that all national cemeteries are exceptionally significant places that are eligible for listing in the National Register of Historic Places. The entire national cemetery property was subject to previous investigation, coordinated with the Ohio State Historic Preservation Office (SHPO), prior to its initial development in 1994–1995. The proposed expansion project is located within the existing cemetery property boundary. During original cemetery development, this portion of the property was graded and roadways were added to serve future development needs. Based on the results of an investigation that we sponsored that was conducted by Cultural Resource Analysts, Inc., it is our tentative conclusion that our project will not have an adverse effect on any historic properties.

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In accordance with 36 CFR 800.4(d)(1)(i), we would appreciate receiving any comments in response to this letter and attachments within 30 days. If you have any comments or require any additional information in order to concur with this finding, please contact me at (202) 632-5879 or Glenn.Elliott@va.gov.

Sincerely,

Glenn Elliott
Environmental Engineer
Office of Construction & Facilities Management

Enclosure
February 19, 2015

Rhonda Hayworth
Ottawa Tribe of Oklahoma
PO Box 110
13 S. Hwy. 69 A
Miami, Oklahoma 74354

Dear Rhonda Hayworth,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) is seeking to determine whether any historic properties may be affected by the proposed expansion and improvements to the existing Ohio Western Reserve National Cemetery in Medina County, Ohio. Although the cemetery is not 50 years of age, the National Park Service has determined that all national cemeteries are exceptionally significant places that are eligible for listing in the National Register of Historic Places. The entire national cemetery property was subject to previous investigation, coordinated with the Ohio State Historic Preservation Office (SHPO), prior to its initial development in 1994–1995. The proposed expansion project is located within the existing cemetery property boundary. During original cemetery development, this portion of the property was graded and roadways were added to serve future development needs. Based on the results of an investigation that we sponsored that was conducted by Cultural Resource Analysts, Inc., it is our tentative conclusion that our project will not have an adverse effect on any historic properties.

We would appreciate receiving your advice about any historic preservation or related issues you believe may be involved in our conduct of this undertaking. Attached for your reference and use is a description of the project and a summary of the cultural resources investigation.

In accordance with 36 CFR 800.4(d)(1)(i), we would appreciate receiving any comments in response to this letter and attachments within 30 days. If you have any comments or require any additional information in order to concur with this finding, please contact me at (202) 632-5879 or Glenn.Elliott@va.gov.

Sincerely,

Glenn Elliott
Environmental Engineer
Office of Construction & Facilities Management

Enclosure
February 19, 2015

Melissa Cook, THPO
Forest County Potawatomi Community
Cultural Center, Library & Museum
PO Box 340
Crandon, Wisconsin 54520

Dear Ms. Cook,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) is seeking to determine whether any historic properties may be affected by the proposed expansion and improvements to the existing Ohio Western Reserve National Cemetery in Medina County, Ohio. Although the cemetery is not 50 years of age, the National Park Service has determined that all national cemeteries are exceptionally significant places that are eligible for listing in the National Register of Historic Places. The entire national cemetery property was subject to previous investigation, coordinated with the Ohio State Historic Preservation Office (SHPO), prior to its initial development in 1994–1995. The proposed expansion project is located within the existing cemetery property boundary. During original cemetery development, this portion of the property was graded and roadways were added to serve future development needs. Based on the results of an investigation that we sponsored that was conducted by Cultural Resource Analysts, Inc., it is our tentative conclusion that our project will not have an adverse effect on any historic properties.

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In accordance with 36 CFR 800.4(d)(1)(i), we would appreciate receiving any comments in response to this letter and attachments within 30 days. If you have any comments or require any additional information in order to concur with this finding, please contact me at (202) 632-5879 or Glenn.Elliott@va.gov.

Sincerely,

Glenn Elliott
Environmental Engineer
Office of Construction & Facilities Management

Enclosure
February 19, 2015

Sherri Clemons
Wyandotte Nation
64700 E. Hwy 60
Wyandotte, Oklahoma 74370

Dear Ms. Clemons,

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) is seeking to determine whether any historic properties may be affected by the proposed expansion and improvements to the existing Ohio Western Reserve National Cemetery in Medina County, Ohio. Although the cemetery is not 50 years of age, the National Park Service has determined that all national cemeteries are exceptionally significant places that are eligible for listing in the National Register of Historic Places. The entire national cemetery property was subject to previous investigation, coordinated with the Ohio State Historic Preservation Office (SHPO), prior to its initial development in 1994–1995. The proposed expansion project is located within the existing cemetery property boundary. During original cemetery development, this portion of the property was graded and roadways were added to serve future development needs. Based on the results of an investigation that we sponsored that was conducted by Cultural Resource Analysts, Inc., it is our tentative conclusion that our project will not have an adverse effect on any historic properties.

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In accordance with 36 CFR 800.4(d)(1)(i), we would appreciate receiving any comments in response to this letter and attachments within 30 days. If you have any comments or require any additional information in order to concur with this finding, please contact me at (202) 632-5879 or Glenn.Elliott@va.gov.

Sincerely,

Glenn Elliott
Environmental Engineer
Office of Construction & Facilities Management

Enclosure
Proposed Project: Expansion and Improvements at Ohio Western Reserve National Cemetery, Rittman, Ohio

This proposed project will cover approximately 30 acres within the boundary of the Ohio Western Reserve National Cemetery and provide for 10 years of burial operations including casket, columbarium, and in-ground cremation sites; and provide an Honor Guard Building, supporting infrastructure, parking, irrigation, landscaping, visitor amenities, signage, and operational facility improvements. NCA is considering three alternatives in the environmental review process:

- **Proposed Action** to expand and improve the Ohio Western Reserve National Cemetery in the northeastern portion of the existing cemetery property, to provide 10 years of burial expansion.
- **Alternative Action** to expand and to not improve the Ohio Western Reserve National Cemetery in the western portion of the existing cemetery property, to provide 10 years of burial expansion.
- The **No Action** alternative to not expand and improve the Ohio Western Reserve National Cemetery, but to continue burial operations until the current cemetery capacity is reached and conducting site maintenance activities thereafter.

The proposed expansion and improvements include the following:

- **Columbarium** – A columbarium would be constructed (25,500 capacity). Each of its three sections would be 4 to 5 niches high (approximately 8 to 10 feet high). The columbarium would be located in the extreme northeastern portion of the project area.
- **Crypt** – Eight crypt sections would be constructed (13,750 capacity). The crypt sections would be located immediately northeast of Flag Boulevard.
- **Garden Niche** – Five garden niche sections would be constructed (3,996 capacity). The garden niche sections would be located between the columbarium and crypt sections in the northeastern and eastern portions of the project area.
- **Committal Shelter** – One committal shelter would be constructed in the southeastern portion of the project area. The committal shelter would be constructed similar to the two existing shelters at the cemetery. The committal shelter would be served by electric utilities to provide lighting and small electric heating capabilities inside the structure. Telephone communications would also be installed.
- **Honor Guard Building** – One Honor Guard Building would be constructed in the vicinity of existing Committal Shelter #2 (southern portion of the cemetery). The Honor Guard Building would be served by electric utilities to provide lighting and small electric heating capabilities inside the structure. Telephone communications would also be installed. The Honor Guard Building would be connected to the cemetery’s potable water supply and served by a wastewater septic system.
- **Roadways and Parking** – New roadways and bump-out parking areas would be constructed in the expansion project area. Existing roadways requiring remediation would be improved. A temporary construction access road would be constructed near the northern property boundary. Signage would be placed throughout the expansion project area as appropriate.
- **Landscaping** – The expansion area would be landscaped in keeping with the overall cemetery appearance, for visual aesthetics and to provide a sound barrier. Landscape irrigation would be provided from a new groundwater supply well that would be part of the site improvements.

The alternative action consists of largely the same elements, although arranged differently in the western part of the cemetery. Figures 1 through 6 depict the cemetery location, the proposed and alternative site plans, and the current site appearance.
Figure 1. Ohio Western Reserve National Cemetery – General Location Map
Figure 2. Ohio Western Reserve National Cemetery – Site Boundary

Legend

Ohio Western Reserve National Cemetery

Coordinate System: WGS84 Web Mercator (Auxiliary Sphere)
Base map Source: Bing Aerial, 2014
Figure 3. Proposed Action
Figure 4. Alternative Action.
The entire national cemetery property was subject to previous investigation prior to its initial development in 1994–1995. It is located in southeastern Medina County, approximately 1.5 miles northwest of Rittman, Ohio. The project area itself is former farmland, cut by Tommy Creek, which encompassed the remains of three farmsteads at the time of the original cultural resources survey in 1993. The proposed project is located in the northwest portion of the original land selected for the cemetery. During original cemetery development, this portion of the property was graded and roadways were added to serve future development needs (Figures 5 and 6). There are no existing structures on the location proposed for the expansion project. Historic architectural resources in the vicinity of the cemetery include several nineteenth-century farmsteads with associated outbuildings.

Figure 5. Existing entrance to Ohio Western Reserve National Cemetery, located at the north end of the alternative action area, facing east.
For the purposes of this proposed project, NCA has defined the area of potential effect (APE) for archaeological resources to include the two approximately 30-acre project areas for the preferred and alternative actions, and the APE for historic architectural resources to include the project areas and adjacent properties within the viewshed of the proposed project. A summary of previous investigations and resources within the APE is provided below, and the locations of previously recorded sites are indicated on Figure 7.

**Archaeological Resources**

The land acquired by NCA for development of the Ohio Western Reserve National Cemetery, consisting of 97 hectares (240 acres), was surveyed in its entirety for archaeological resources and was investigated by a pedestrian survey supplemented with screened shovel testing (Otter 1993). The survey was conducted to identify and evaluate any archaeological resources in the project area that might be adversely affected by the development of the cemetery. Surface survey, using transects spaced at 10-meter intervals, identified 14 prehistoric sites (33ME290 through 33ME303). Shovel tests were excavated every 30 meters in transects spaced 30 meters apart. A total of 177 shovel tests were excavated, resulting in documentation of two historic sites (33ME304 and 33ME305). A third historic site (33ME306) was documented on the basis of standing structures and the potential for archaeological deposits.
Figure 7. Topographic map depicting the locations of previously recorded OAI and OHI sites within the APE.
Sites 33ME290–33ME303 consisted of one to four prehistoric lithic artifacts, none of which were diagnostic. Site size ranged from 1 to 100 square meters for these 14 sites. Nine of the 14 sites have isolated finds. None of these sites were deemed eligible for the National Register of Historic Places (NRHP). Site 33ME304 is the Shook site, an archaeological component associated with a standing structure. The site dimensions were given as 200 meters north–south by 100 meters east–west. Two shovel test pits were positive for artifacts at this location. Shovel Test 22 Level 1 yielded one piece of window glass and one piece of plain whiteware, while Shovel Test 27 Level 1 yielded one piece of asbestos siding, two pieces of coal, three brick fragments, one piece of window glass, one screwlid-type jar rim fragment, and two pieces of whiteware. Shovel Test 34 revealed a line of mortar 6 centimeters below the surface, running north–south; this line of mortar was traced for a length of 1.5 meters (5.0 feet) and was thought to be associated with a house foundation. Site 33ME305, the Hutchinson site, had an estimated area of 110 meters by 110 meters, with the western edge of the site situated along Rawiga Road. One positive shovel test pit produced one wire nail, one amber bottle glass fragment, four pieces of mortar, one piece of concrete, two brick fragments, and four pieces of buff stoneware, all from Level 1. This archaeological component was associated with a concrete block garage and the ruined remains of a barn. Site 33ME306, the Walker site, was assumed to be associated with an extant structure, but no shovel tests were excavated in the lawn surrounding the property as the house was occupied at the time of survey.

Sites 33ME0294 and 33ME0293, both unknown prehistoric sites, are located in the Proposed Action area. Site 33ME0305, a historic site; Site 33ME0291, an unknown prehistoric site; and Site 33ME304, the historic site associated with the Shook farmstead, are located within the alternative action area. As discussed during an onsite meeting with Ohio SHPO on December 16, 2014, the original 1993 archaeological survey was adequate; it was accepted by the Ohio SHPO when it was submitted for review, and no further archaeological survey is required in connection with any part of this proposed project included in the original survey. Neither the Proposed Action nor the Alternative Action would affect archaeological resources that are eligible for listing in the NRHP.

References


February 26, 2015

Regulatory Division
North Branch
LRH-2014-1022-MUS-Unnamed Tributary Tommy Run

APPROVED JURISDICTIONAL DETERMINATION

Mr. Glenn Elliott
United States Department of Veterans Affairs
Office of Construction & Facilities Management
425 I Street, NW Room 6W417a
Washington, D.C. 20001

Dear Mr. Elliott:

I refer to the Wetland Determination Report Ohio Western Reserve National Cemetery 10175 Rawiga Road City of Rittman, Medina County, OH (Report) dated 3 December 2014 and prepared by SmithGroup JJR. You have requested an approved jurisdictional determination (JD) for the aquatic resources identified within the proposed northeastern expansion area of the existing Ohio Western Reserve National Cemetery. The Ohio Western Reserve National Cemetery is located (N 41.00608, W -81.81215) in the City of Rittman, Medina County, Ohio. Your JD request has been assigned the following file number: LRH-2014-1022-MUS-Unnamed Tributary Tommy Run. Please reference this file number on all future correspondence related to this JD request.

The United States Army Corps of Engineers’ (Corps) authority to regulate waters of the United States is based, in part, on the definitions and limits of jurisdiction contained in 33 CFR 328 and 33 CFR 329. Section 404 of the Clean Water Act (Section 404) requires a Department of the Army permit be obtained prior to the discharge of dredged and/or fill material into waters of the United States, including wetlands. Section 10 of the Rivers and Harbors Act of 1899 (Section 10) requires a Department of the Army permit be obtained for any work in, on, over or under a navigable water of the United States. Our December 2, 2008 headquarters guidance entitled Clean Water Act Jurisdiction Following the U.S. Supreme Court’s Decision in Rapanos v. United States & Carabell v. United States was followed in the final verification of Section 404 jurisdiction.

Based upon a review of the submitted report and a site visit conducted on November 12, 2014 by representatives of this office, six wetlands (Wetlands A-F) are present within the study area as indicated in the table below.
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<th>Aquatic Resource ID</th>
<th>Wetland Classification/Flow Regime</th>
<th>Delineated Area (Acres and/or Linear Feet)</th>
<th>Isolated or Jurisdictional</th>
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<td>Palustrine emergent</td>
<td>0.08</td>
<td>Isolated</td>
</tr>
<tr>
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</tr>
<tr>
<td>Wetland F</td>
<td>Palustrine emergent</td>
<td>0.03</td>
<td>Isolated</td>
</tr>
</tbody>
</table>

Wetlands A-F are completely surrounded by uplands and do not present hydrologic connections to a surface tributary system. In addition to being hydrologically isolated from a surface tributary system, Wetlands A-F do not appear to support interstate or foreign commerce interests nor do they contain any rare or endangered species. Based on this information, we have determined Wetlands A-F are isolated wetlands and are not jurisdictional waters of the United States. Therefore, no Section 404 authorization would be required from this office for the discharge of dredged and/or fill material into these wetlands. However, you should contact the Ohio Environmental Protection Agency, Division of Surface Water, at 614-644-2001 to determine state permit requirements.

In accordance with the June 5, 2007 Joint Memorandum between the United States Environmental Protection Agency (USEPA) and the Corps, and the January 28, 2008 Corps Memorandum regarding coordination on jurisdictional determinations, this determination was coordinated with the USEPA Region 5 and Corps Headquarters, with coordination completed on February 23, 2014.

This jurisdictional verification is valid for a period of five years from the date of this letter unless new information warrants revision of the delineation prior to the expiration date. This letter contains an approved JD for the subject site. If you object to this determination, you may request an administrative appeal under Corps regulations at 33 CFR 331. Enclosed you will find a Notification of Appeal Process (NAP) fact sheet and Request for Appeal (RFA) form. If you request to appeal this determination you must submit a completed RFA form to the Great Lakes and Ohio River Division Office at the following address:

Appeals Review Officer  
Great Lakes and Ohio River Division  
550 Main Street RM 10524  
Cincinnati, Ohio 45202-3222  
Phone: (513) 684-7261 Fax: (513) 684-2460

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 CFR 331.5, and that it has been received by the Division Office within 60 days of the date of the NAP. Should you decide to submit an RFA form, it must be received at the above address by April 27, 2015. It is not necessary to submit an RFA form to the Division Office if you do not object to the determination in this letter.
This determination has been conducted to identify the limits of the Corps' Section 404 jurisdiction for the particular site identified in this request. This determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985. If you or your tenant are United States Department of Agriculture (USDA) program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service prior to starting work.

A copy of this letter is being provided to Ms. Rachel Taulbee with the Ohio Environmental Protection Agency at the Lazarus Government Building, Post Office Box 1049 Columbus, Ohio 43216-3669. If you have any questions concerning the above, please contact Lee A. Robinette of the North Branch at 304-399-5930, by mail at the above address, or by email at: lee.a.robinette@usace.army.mil.

Sincerely,

Teresa D. Spagna
Acting Chief, North Branch

Enclosures
February 23, 2015

Mr. Derrick Harmon
Natural Resources Conservation Service
6090 Wedgewood Rd.
Medina, OH 44256

Re: Ohio Western Reserve National Cemetery, Proposed Cemetery Expansion Project

Dear Mr. Harmon:

On February 12, 2015, the U.S. Department of Veteran Affairs, National Cemetery Administration (NCA) submitted a Farmland Conversion Impact Rating form to the Natural Resources Conservation Service (NRCS) regarding proposed and alternative expansion areas at the Ohio Western Reserve National Cemetery in Medina County, Ohio. On February 13, 2015, NCA received a determination that the proposed and alternative expansion areas contain prime, unique, statewide, or local important farmland.

In accordance with the Farmland Protection Policy Act, enclosed is the Farmland Conversion Impact Rating form with Parts VI and VII completed. NCA completed the site assessment criteria evaluations, arriving at a total score of 120 points for both the proposed and alternative expansion areas. As the total score is less than 160 points, NCA concludes that the expansion areas need not be given further consideration for protection and no additional sites need to be evaluated.

If you have any comments or require any additional information, please contact me at (202) 632-5879 or Glenn.Elliott@va.gov.

Sincerely,

Glenn Elliott, Environmental Engineer
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management

cc: Steve Baker, USDA-NRCS, State Soil Scientist
# FARMLAND CONVERSION IMPACT RATING

## PART I

**Date Of Land Evaluation Request**: February 12, 2015

**Name of Project**: OWR National Cemetery Expansion

**Federal Agency Involved**: National Cemetery Administration

**Proposed Land Use**: Cemetery Operations

**County and State**: Medina County, OH

## PART II

**Date Request Received By NRCS**: 2/12/15

**Person Completing Form**: Steve Baker

**Average Farm Size**

- Hay Beans Corn
  - Acres: 94 % 145763

## PART III

**Farmland In Govt. Jurisdiction**

- Acres: 94 % 145890

**Date Land Evaluation Returned by NRCS**: 2/13/2015

## PART IV

### Land Evaluation Information

- **Total Acres Prime And Unique Farmland**: 19.3
- **Total Acres Statewide Important or Local Important Farmland**: 6.2
- **Percentage Of Farmland in County Or Local Govt. Unit To Be Converted**: 0.0002
- **Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value**: 83

## PART V

**Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)**

- **Maximum Points**
  - Site A: 60
  - Site B: 60

## PART VI

### Site Assessment Criteria

- **Maximum Points**
  - Site A: 160
  - Site B: 60
  - Site C: 0
  - Site D: 0

### Relative Value Of Farmland

- **From Part V**: 100

## PART VII

### Total Points

- **Total of above 2 lines**: 260

**Site Selected**: A (Proposed Site)

**Date Of Selection**: February 23, 2015

**Reason For Selection**: Within cemetery property, adjacent to current operations, few isolated wetlands, no significant adverse environmental impacts. Site B (Alternative Site) may be considered for future cemetery expansion.

**Name of Federal agency representative completing this form**: Glenn Elliott

**Date**: 02/23/2015
April 15, 2015

Glenn Elliott
Dept. of Veterans Affairs
Office of Construction & Facilities Mgmt.
425 I St. NW, Room 6W417a
Washington, DC 20001

Dear Mr. Elliott,

After reviewing the Natural Heritage Database, I find the Division of Wildlife has no records of rare or endangered species in the Ohio Western Reserve National Cemetery Expansion project area, including a one mile radius, in Guilford Township, Medina County, Ohio. We are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forests, national wildlife refuges, parks or forests or other protected natural areas within a one mile radius of the project area.

Our inventory program has not completely surveyed Ohio and relies on information supplied by many individuals and organizations. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. This letter only represents a review of rare species and natural features data within the Ohio Natural Heritage Database. It does not fulfill coordination under the National Environmental Policy Act (NEPA) or the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S. C. 661 et seq.) and does not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

Please contact me at 614-265-6818 if I can be of further assistance.

Sincerely,

Debbie Woischke
Ohio Natural Heritage Database Program
March 10, 2015

Re: Western Reserve National Cemetery
General Correspondence
401 Wetlands
Medina County

Glenn Elliott
US Department of Veterans Affairs
Office of Construction & Facilities Management
425 I Street, NW, Room 5W417a
Washington, D.C. 20001

Subject: Ohio EPA Certification Requirements

Dear Mr. Elliott:

Ohio EPA has been notified by the Huntington District of the Army Corps of Engineers isolated wetlands have been delineated on your project site for the proposed expansion of the Western Reserve National Cemetery located on Rawiga Rd in the City of Rittman, Medina County. As indicated in their February 26, 2015 letter, you must coordinate your project with the State of Ohio regarding impacts to isolated wetlands. If you propose to impact the non-jurisdictional waters (isolated wetland), you will first need to fill out an Isolated Wetland Permit application and submit the required information. Once received, Ohio EPA's Division of Surface Water (DSW) will review your application in accordance with Ohio Revised Code, Sections 3745.113 and 6111.02 through 6111.029. The proposed project may be subject to the public notice and public participation requirements of the Antidegradation rule.

You can download the necessary applications and supporting documents from the Ohio EPA's DSW web page at http://epa.ohio.gov/dsw/401/permitting.aspx. Your consultant should be knowledgeable of the permitting practice and can prepare the applications for you.

Please be advised that before any impacts are imposed, you must submit a permit application and receive the appropriate permits. If you have any questions, please contact me at (330) 963-1112 or via email at rich blasick@epa ohio.gov.

Sincerely,

[Signature]

Richard D. Blasick, P.E.
Environmental Manager
Division of Surface Water

RDB/cs
APPENDIX B: COMMENTS ON DRAFT ENVIRONMENTAL ASSESSMENT

- U.S. Environmental Protection Agency Region 5
- Ohio State Historic Preservation Office
- City of Rittman City Manager
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Mr. Glenn Elliott  
U.S. Department of Veterans Affairs  
Office of Construction & Facilities Management  
425 Eye Street NW  
Room 6W417a  
Washington DC  20001  

Re: Draft Environmental Assessment for Improvements and Expanded Operations,  
Ohio Western Reserve National Cemetery, Rittman, Ohio  

Dear Mr. Elliott:  

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the United States Environmental Protection Agency (EPA) reviewed the Department of Veterans Affairs (VA) above-referenced Draft Environmental Assessment (DEA), dated April 14, 2015. This letter provides the results of our review.  

The DEA identifies a proposal by the VA to make improvements and expand operations on approximately 30 acres within the existing national cemetery site. The EA adequately describes the no action and action alternatives considered. A preferred alternative (expansion and improvement in the northeastern portion of the existing cemetery property to provide for 10 years of burial expansion) is identified. The rationale for the proposed elimination of other alternatives is provided. Impacts and potential mitigation measures are disclosed. No substantial wetland impacts (less than a half-acre) are anticipated.  

The proposed alternative along with the alternatives not chosen in the EA were reviewed for such impacts associated with potential physical, environmental, cultural, and socioeconomic effects. EPA has the following comment:
Section 3.5 Hydrology and Water Quality: This section provides a brief description of local topography with proximate surface waters and ground water resources. The DEA further provides assurances that operations will not affect ground water quality based on alternate burial practices in areas of high water table.

Recommendation: There is no discussion on the potential chemical impacts on the environment and surrounding community from the burial operations and the practice of embalming. The Final EA should provide some discussion on current day embalming practices, the chemicals from embalming that could impact groundwater and surface water, as well as the fate and transport of those chemicals in the environment.

Thank you for the opportunity to review and comment on the EA. EPA requests a copy of the VA NEPA determination for this proposal as soon as it becomes available. If you have any questions regarding our comments, contact Mike Lukowich, P.E., at (312) 353-4645 or Lukowich.Michael@epa.gov.

Sincerely,

Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance
June 23, 2015

Mr. Glenn M. Elliott, Environmental Engineer
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management
425 ‘Eye’ Street N.W., Room 6W417A
Washington, D.C. 20001

Re: Ohio Western Reserve National Cemetery EA
Guilford Township, Medina County, Ohio

Dear Mr. Elliott,

This is in response to correspondence from your office dated April 17, 2015 (received April 20), regarding the above referenced project. The comments of the Ohio State Historic Preservation Office (SHPO) are submitted in accordance with provisions of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 [36 CFR 800]).

The undertaking will continue construction of cemetery facilities within the existing cemetery. SHPO reviewed this undertaking prior to the initiation of the construction of the cemetery in the 1990s. At that time an intensive archaeological survey was conducted and SHPO concurred that none of the identified archaeological sites was eligible for inclusion in the National Register. We also concurred that none of the standing architecture in the proposed cemetery was eligible for inclusion in the National Register. For the current proposed capacity expansion we agree that no additional archaeological survey is needed. Given the passage of twenty years and the potential that standing architecture could have achieved significance, we requested and received additional information on farm buildings from where the cemetery or the traffic to and from the cemetery would be within the viewshed. Based on the documentation we received and analysis presented in the EA, we concur that there will be No Historic Properties Affected by this undertaking. No additional coordination with this office is necessary for this undertaking unless there is a change in the scope of work. In addition, if new or additional effects or historic properties are identified this office should be notified [36 CFR 800.13].

Any questions concerning this matter should be addressed to David Snyder at (614) 298-2000, between the hours of 8 am. to 5 pm. Thank you for your cooperation.

Sincerely,

David Snyder, Archaeology Reviews Manager
Resource Protection and Review

DMS/ds (OHPO Serial Number 1058009)
April 28, 2015

Mr. Glenn Elliot
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management
Environmental Engineer
425 Eye Street NW
Room 6W417a
Washington DC 20001

Re: Ohio Western Reserve National Cemetery EA

Dear Mr. Elliott,

The City of Rittman greatly admires the work that has been done at the Ohio Western Reserve National Cemetery and look forward to the construction listed in your expansion plan that was mailed to my office dated April 17th.

We would like to bring to your attention a potential problem that you need to be aware of regarding the plan to drill water wells on your facility for the purpose of irrigation. The City of Rittman has an existing ordinance banning water wells being put in when City Water lines are located within and on your property. I have copied the ordinance section for your inspection:

961.05 WATER TAP-IN POLICY; EXEMPTIONS.
(a) Any person owning property within the corporate limits of the City, which property is improved with one or more residences, houses, buildings or structures for or intended for human use, occupancy, employment or any other similar purpose whatever, and the property abuts on any street, alley or right of way in which there is located a water line within 100 feet from the nearest property line, shall, within ninety days after such water line is in service, at his expense, install suitable facilities in the residences, houses, buildings or structures and connect the facilities with the water in accordance with the terms and provisions of this section; provided, however, that in the event compliance with this section causes economic hardship to the person, he may apply to the City for exemption. An application for exemption shall state in detail the circumstances which are claimed to cause the economic hardship. Exemptions shall only be granted to residential users and shall not apply to commercial and industrial users.

The other issue that we are concerned about is the fact that when the Ohio Western Reserve Cemetery was built it was insisted that we put in a 12 inch water line to that facility for consumption and to fill the irrigation pond. With the weather in NE Ohio, it has been my understanding that the existing irrigation pond has not needed to be replenished very often, and the few employees that are assigned to the facility have not used the water as much as expected.
which causes concern for the chlorine level in the 12 inch main to dissipate before it is being used for consumption. We feel that if the Western Reserve Cemetery would continue to put in water for irrigation this problem will continue and be even more prevalent with the chlorine dissipation problem.

City Council discussed this issue last night at their regular meeting and directed me to send a letter to you expressing the fact that while they are concerned with this situation they do support the National Cemetery and this project. If you have any comments, concerns or ideas on how we can resolve this issue we are certainly willing to look at any and all proposals.

Thank you for your time regarding this issue.

Larry A. Boggs

City Manager