

**FINDING OF NO SIGNIFICANT IMPACT (FONSI)**  
**U.S. DEPARTMENT OF VETERANS AFFAIRS**  
**PROPOSED CONSTRUCTION AND OPERATION OF THE**  
**GRAVESITE EXPANSION AND CEMETERY IMPROVEMENTS PROJECT AT THE**  
**FLORIDA NATIONAL CEMETERY, BUSHNELL, SUMTER COUNTY, FLORIDA**

**Introduction**

The U.S. Department of Veterans Affairs (VA), National Cemetery Administration (NCA), prepared a Final Site-Specific Environmental Assessment (SEA), included herein by reference, that was prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Proposed Action to construct and operate an approximately 50-acre cemetery expansion phase within the existing Florida National Cemetery located at 6502 SW 102nd Avenue, Bushnell, Sumter County, Florida. Under the Proposed Action, the VA would extend the longevity of the Florida National Cemetery by creating three new burial areas on currently undeveloped forested land within the western portion of the existing cemetery property. The Proposed Action would provide a total of approximately 50,350 casket, columbarium, and in-ground cremation burial sites; roadways connecting the existing cemetery to the new burial areas; and expanded infrastructure, including stormwater management, irrigation, and landscaping improvements at the new burial areas. The Proposed Action would be designed according to the 2005 Florida National Cemetery Expansion Site Master Plan.

The SEA was prepared in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 et seq.), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and VA's NEPA implementing regulations, 38 CFR Part 26 (*Environmental Effects of the Department of Veterans Affairs Actions*). The SEA also tiers to and incorporates by reference the findings from the VA's 1983 Final Environmental Impact Statement for the initial siting, construction, and operation of the Florida National Cemetery, as well as the VA's 2004 EA for the additional purchase of approximately 137 acres of land, which the VA subsequently developed as the western expansion of the Florida National Cemetery and where the Proposed Action expansions would be located.

The **purpose** of the Proposed Action is to enable the NCA to continue providing interment benefits to eligible veterans and their families by further extending the longevity of the Florida National Cemetery.

The Proposed Action is **needed** to allow the NCA to continue meeting its goal of providing eligible veterans and their families with reasonable access to VA burial options in central Florida. NCA defines reasonable access to burial benefits as follows: "a first interment option, for casketed or cremated remains in national or state Veteran's cemetery, is available within 75 miles of the Veterans' home".

If the Proposed Action is not implemented, the longevity of the Florida National Cemetery would not be extended, and future generations of eligible veterans and their families increasingly would not have long-term, reasonable access to burial benefits at a National Cemetery in central Florida. These veterans and their families would be required to travel to a National Cemetery located more than 75 miles from central Florida. The nearest National Cemetery is the Cape Canaveral National Cemetery, located approximately 120 miles to the east in Titusville, Florida; the Jacksonville National Cemetery located approximately 170 miles to the northeast in Jacksonville, Florida; the Tallahassee National Cemetery located approximately 225 miles to the northwest in Tallahassee, Florida; and the South Florida National Cemetery located approximately 250 miles to the southeast in Lake Worth, Florida.

## **Background**

NCA is responsible for providing cemetery services for veterans and other eligible persons pursuant to the provisions of the *National Cemeteries Act of 1973* and other statutory authority and regulations. Under this mandate, NCA is responsible for the operation and maintenance of existing national cemeteries and the construction of new national cemeteries.

In 1980, the VA completed an EIS for the site selection and future development of an approximately 400-acre property that is now the Florida National Cemetery. The initial phased of construction began in 1986, and the first interments occurred in 1988. By 1999, the VA determined the original capacity of the Florida National Cemetery would be reached by 2006, approximately 20 years sooner than planned. In response, the VA in 1999 expanded the cemetery by purchasing an approximately 137-acre parcel adjacent to the west of the original cemetery boundary. A conservation easement with the State of Florida prohibits development on approximately 25 of the 137-acre tract, leaving 112 acres available for development. In 2004, the VA completed an Environmental Assessment (EA) for the conceptual future development of the 112-acre area and concluded that development would have no significant adverse impact on the environment. In 2005, the VA completed the Expansion Site Master Plan that specified the layout for future cemetery expansion phases within the 112-acre tract. To date, the VA has developed approximately 65 acres of the 112-acre tract with new interment sites, roadways, irrigation systems, and a satellite maintenance building.

Under the current Proposed Action, three expansion areas and associated infrastructure improvements would be located within an approximately 50-acre portion of the 112-acre tract, which the layout of each expansion area following the design depicted in the 2005 Expansion Site Master Plan. An SEA for this Proposed Action is now required to assess the potential impacts associated with the construction and operation of the expansions and infrastructure improvements, as these site-specific details were not available at the time when the prior 2004 EA was prepared.

## **Description of Proposed Action and Alternatives**

### ***Proposed Action***

Under the Proposed Action, the expansions and infrastructure improvements would occur at three separate areas (East Area, South Area, and West Area) within a "Project Study Area" totaling approximately 50 acres. As summarized in Table 1 below, the Proposed Action would provide approximately 13,850 pre-placed crypt sites, 14,000 cremains in-ground burial sites, 500 private gravesites, and 22,000 columbarium niches; roadways connecting the new burial areas to the existing cemetery roadways; stormwater retention basins to accommodate the increased run-off from new impervious surfaces; landscaping with native, non-invasive plants; and extension of irrigation utilities to maintain the new landscaping. The Proposed Action will extend the longevity of the Florida National Cemetery and accommodate future long-term burial needs of future generations of veterans and their families in central Florida. Therefore, the Proposed Action would meet the purpose and need for action. No other reasonable action alternatives were carried forward for this SEA.

Table 1. Summary of the Proposed Action Elements

Project Study Area Name (size in acres)	Proposed Expansion Development Activity within Each Expansion Area
East Area (6.5 acres)	Clear and grade approximately 3.8 acres of forested land. Develop with approximately 14,400 columbarium niches, and construct an access road connecting the new niches to the existing cemetery.
South Area (30.9 acres)	Clear and grade approximately 21.5 acres of forested land. Develop with approximately 9,000 in-ground cremains sites, 13,000 pre-placed crypt sites, and construct an access road connecting the new burial areas to the existing cemetery.
West Area (11.1 acres)	Clear and grade approximately 4.5 acres of forested land. Develop with approximately 2,000 in-ground cremains sites, 9,040 columbarium niches, and construct an access road connecting the new burial areas to the existing cemetery.

The constructed elements would have the following features:

- Columbarium – Columbarium sites would be graded and have multiple sections of niches each 4- to 5- inches high (approximately 7-8 feet high) with a border of landscaped grounds and existing forest. Columbarium capacity would be 14,400 in the East Area (three sections with 4,800 niches each) and 9,040 in the West Area. The columbarium in the West Area would be separated from the in-ground cremains section by existing forest.
- In-Ground Cremains – Sites would be graded and separated from other interment areas using landscaped vegetation. Capacity would be approximately 2,000 in the West Area (two sections with 1,000 sites each) and 9,000 in the South Area (nine sections with 1,000 sites each). The South Area cremains section would be surrounded by the new ring road.
- Pre-Placed Crypts – Crypt sections would be graded and constructed in five sections surrounding the central in-ground cremains section in the South Area. Each section would provide approximately 2,600 sites (13,000 total sites). Each crypt section would be landscaped with grass and decorative shrubs and would be separated from other crypt sections by existing forest and from the cremains section by the new ring road.
- Roadways and Parking – New roadways would be constructed to extend access from existing roadways to the new interment areas. The West Area ring roadway would be approximately 0.3 miles; the East Area semi-circle would be 0.1 mile; and the South Area ring roadway would be approximately 0.5 miles long. No modifications to existing roadways would be required. No new parking areas would be created; visitors are allowed to park on the roadway shoulders.
- Landscaping/Irrigation – The expansion areas would be landscaped in a manner consistent with the overall cemetery appearance, for visual aesthetics, and to provide privacy. Planted vegetation would include shrubs (ex. *Loropetalums* cultivars), trees (ex. Crepe Myrtle), and turf (ex. St. Augustine grass), which are currently planted at the Florida National Cemetery. Landscape irrigation water would be provided from a combination of the existing groundwater wells that currently supply the Florida National Cemetery and a new groundwater supply well installed within the boundary of the Florida National Cemetery.

The following paragraphs summarize major design elements incorporated into the Proposed Action that are protective of the natural environment.

- *Avoidance of Environmentally Sensitive Areas.* Based on the 2005 Expansion Site Master Plan (VA, 2005a), the VA has designed the expansion areas to entirely avoid development within the conservation easement areas surrounding the majority of the South Area and to the east of the East Area. Additionally, only approximately 30 acres of the 50-acre Project Study Area require clearing, while existing vegetation will be preserved in the remaining 19 acres. Surveys for on-site jurisdictional wetlands “Waters of the U.S.” were performed and concluded that none were present. 100-year and 500-year floodplains are not present and do not require avoidance.
- *Avoidance and Protection of Listed Species.* Prior to construction, the VA will conduct surveys for gopher tortoises and eastern indigo snakes; if present, individual animals will be relocated to an approved off-site recipient location.
- *Stormwater Management.* The Proposed Action would create approximately 100,000 square feet of new impervious surfaces, primarily from the new roadways (approximately 0.9 miles, 20-foot width) in the South Area (VA, 2005a). The development would be graded to direct stormwater into a new stormwater retention basin to be constructed adjacent to the northwest and south crypt sites (VA, 2005a). The additional volume of stormwater run-off in the West and East Areas would be directed to existing stormwater drainage basins in each of those areas (VA, 2005a).

As part of the design process, the VA would also comply to the maximum extent technically feasible with the U.S. Environmental Protection Agency’s (USEPA) Technical Guidance on Implementing the Stormwater Run-off Requirements for Federal Projects under Section 438 of the *Energy Independence and Security Act* (EISA) (USEPA, 2009).

- *Utility Requirements – Irrigation Water Supply.* Operation of the proposed expansion areas would require consumption of water for irrigation. Consumption of no other utilities would be required to operate the expansion areas. As previously noted, irrigation water would be obtained from a combination of existing groundwater supply wells currently used to supply irrigation water at the cemetery, and a new groundwater well to be installed within the cemetery property during construction.
- Based on the 2005 Expansion Site Master Plan (VA, 2005a), the expansion areas include approximately 25 acres of irrigated landscaping. The estimated watering needs for this area are less than approximately 50,000 gallons per day (GPD) at peak season, and this volume is accounted for within the VA’s recently submitted Water Use Permit modification for a total requested water use of 743,100 GPD (SWFWMD Application 20008675-006, dated July 1, 2018).

### **No Action Alternative**

The No Action alternative represents the status quo and serves as the benchmark against which the effects of the Proposed Action is evaluated. For this project, No Action is defined as not expanding and improving the Florida National Cemetery, and continuing burial operations until the existing cemetery reaches capacity within continuing maintenance activities thereafter.

The No Action alternative would challenge NCA’s goal of providing eligible veterans with reasonable access (within 75 miles of the veteran’s home) to VA burial options in central Florida, and, therefore,

would not meet the purpose and need for the Proposed Action. Under the No Action alternative, the longevity of the Florida National Cemetery would not be extended, causing the estimated 470,000 veterans and their families residing in central Florida to be underserved in the future. At that point, the VA would not be in compliance with the requirements of the *Service Members Civil Relief Act*.

Once the current capacity of the Florida National Cemetery is reached, veterans and their families would be required to travel further to other National Cemeteries with available capacity. As previously described, the nearest National Cemeteries to central Florida include the Cape Canaveral National Cemetery (120 miles east); the Jacksonville National Cemetery (170 miles northeast); the Tallahassee National Cemetery (225 miles northwest); and the South Florida National Cemetery (250 miles southeast). Furthermore, the No Action alternative would create hardships for the survivors of deceased veterans who wish to attend funerals and grave visitations at a National Cemetery located outside of central Florida, due to the longer distances between their homes and the burial sites outside of this region. If Veterans and their families must resort to private burials, they are deprived of the honor and privilege bestowed upon them by a grateful nation for their service to their country.

### **Environmental Analysis**

As documented in the SEA, the VA concludes that no significant adverse impacts, considered individually or cumulatively, would result from implementing the Proposed Action. Construction activities associated with the Proposed Action would occur over an approximately 18-month period and include land clearing, grading, extension of irrigation utilities, road paving, and installation of pre-placed crypts and columbarium. Where the construction activities cannot entirely avoid impacting the environment, the Proposed Action incorporates measures to minimize potential impacts to less-than-significant adverse levels to resources including aesthetics, air quality, cultural resources associated with inadvertent discovery, topography, soil, groundwater, wildlife and habitat, noise, solid waste management, transportation, and the irrigation utility. The level of adverse impact on many of these resources is considered to be negligible. With the exception of wildlife and habitat, adverse impacts to all other resources would end once the 18-month construction period is completed. The loss of approximately 30 acres of forest habitat would have a long-term, less-than-significant adverse impact on common flora and fauna; no federally-listed flora are present. Potential adverse impacts to the state-listed gopher tortoise (*Gopherus polyphemus*) and federally-listed eastern indigo snake (*Drymarchon couperi*) would be minimized at less-than-significant levels through avoidance and relocation of individual animals prior to the start of construction activities. Construction would have a short-term, less-than-significant beneficial impact on socioeconomics as a result of hiring local construction workers and purchasing construction materials from local and regional vendors when practical.

Under the Proposed Action, existing VA staff would professionally operate and maintain the new expansion areas and infrastructure. Maintenance would involve irrigation and mowing of newly landscaped areas, cleaning memorial sites, and waste collection (primarily discarded flowers). The noise from these activities would have a less-than-significant impact on visitors; the noise levels and short-term durations would be similar to operational noises currently generated at the cemetery and experienced by visitors. Potential impacts to soil quality associated with excavations for individual burial sites would be maintained at less-than-significant adverse levels by minimizing the generation of excess soils, limiting the area of exposed soils, and revegetating exposed soils with native, non-invasive vegetation. Operation of the Proposed Action would have a long-term, significant beneficial impact on community services by providing approximately 47,000 new interment sites to veterans and their families. Extending the longevity of the Florida National Cemetery would also have a long-term, beneficial impact on socioeconomics by lessening the costs of visitors who travel to the Florida National

Cemetery and who also reside in central Florida.

Construction or operation of the Proposed Action would have no adverse impact on parking, geology, environmental justice, coastal zone resources, community services other than burial services, or on resources that are not present at the Project Study Area including surface waters, floodplains, and wetlands. Additionally, implementing the Proposed Action would not generate substantial public controversy.

The VA will implement the management, avoidance, and regulatory compliance measures to minimize impacts to the aforementioned environmental resources at less-than-significant adverse levels as described in the SEA and summarized in the attached table (included as Appendix A in this FONSI).

### **Agency and Public Comment**

On December 11, 2017, the VA held a meeting at the VFW William L. Lovett Post at 6036 County Road 618, Bushnell, Florida, to inform the public and stakeholders about the Proposed Action and the NEPA process. An announcement was published in advance of the meeting in the *Village Daily Sun* on December 8 and 10, 2017. Public comments received during the meeting focused on administrative (non-environmental) improvements at the Florida National Cemetery. Additionally, during preparation of the Draft SEA, the VA mailed letters on December 5, 2017, to solicit early input on the Proposed Action from federal, state, and local agencies, as well as three federally-recognized Native American Tribes (Miccosukee Tribe of Indians of Florida; Seminole Tribe of Florida; Seminole National of Oklahoma). The letter also invited these organization to attend the public meeting. The USEPA responded to the letter by recommending that the expansion areas avoid wetlands and floodplains, and to coordinate with the USFWS. The USFWS nor any other organization responded to the letter requesting early input on the Proposed Action.

On May 2, 2018, the VA sent letters that explained how the VA had determined the Proposed Action would have no adverse impact on cultural resources and requested concurrence from the Native American Tribes and the Florida State Historic Preservation Office (SHPO). On May 18, 2018, the Florida SHPO concurred that the Proposed Action would have No Adverse Effect on historic properties, but that the VA should implement an inadvertent discovery program during ground-disturbing activities. On June 5, 2018, the Seminole Tribe of Florida requested additional information to complete their review of the Proposed Action pursuant to Section 106 and 36 CFR 800. On August 15, 2018, the VA provided the requested information, and on September 27, 2018, the Seminole Tribe of Florida responded with no objections to the Proposed Action, but requested notification if any archaeological, historical, or burial resources are inadvertently discovered.

Upon completion of the Draft SEA, a NOA announcing its availability for a 30-day review period was published in the *Village Daily Sun* on August 19 and 21, 2018. Additionally, a copy of the NOA was mailed to all of the federal, state, and location agencies and Native American Tribes previously solicited for input. On September 24, 2018, the Florida Clearinghouse allowed the VA to proceed with the Proposed Action without further review from the Clearinghouse under Executive Order 12372. No other agency or public comments were received during the 30-day review period. Accordingly, no substantive changes to the Draft SEA were required to prepare the Final SEA.

**Finding of No Significant Impact**

As a result of the analysis of impacts in the SEA, summarized and incorporated by reference herein, it is the conclusion of VA that, with the implementation of appropriate management, avoidance, and regulatory compliance measures included herein as Appendix A, the Proposed Action would not generate significant public controversy and would cause no significant impact of an adverse nature on the quality of the natural or human environment within the meaning of Section 102(2)(I) of the National Environmental Policy Act of 1969. Therefore, per the NEPA, the CEQ regulations, and 38 CFR Part 26, I am signing this FONSI, and preparation of an Environmental Impact Statement for the Proposed Action is not required.

Stephan J Frank  
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Stephan Frank  
Executive Director, Southeast District  
National Cemetery Administration

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Date

Glenn M. Elliott 689970

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Mr. Glenn Elliott, Senior PP/M  
Environmental Officer  
VA Construction and Facilities Management Office

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Date

**APPENDIX A**

**Best Management Practices, Environmental Avoidance and Protection Measures, and Regulatory Compliance Measures Incorporated into the Proposed Action**

<b><i>AESTHETICS</i></b>
<b>Construction</b>
<ul style="list-style-type: none"><li>Control fugitive dust emissions through routine construction BMPs, including using water trucks to prevent dust emissions and gravel-covered access roads to remove dirt from the tires of vehicles leaving the construction areas in the Proposed Action site.</li></ul>
<ul style="list-style-type: none"><li>Erect temporary privacy fence around the construction zone and maintain the existing vegetative buffers around the perimeter of the East Area expansion. Erect temporary privacy fencing during construction in the West and South Areas along the borders nearest to SW 65th Terrace.</li></ul>
<b>Operation</b>
<ul style="list-style-type: none"><li>Routine and scheduled professional landscape maintenance to ensure the upkeep of the park-like appearance of the grounds and associated physical infrastructure (e.g. roads, interment areas).</li></ul>
<b><i>AIR QUALITY</i></b>
<b>Construction</b>
<ul style="list-style-type: none"><li>Implement dust suppression methods to include application of water, construction scheduling, and maintaining limited and decreased on-site vehicle speed limits.</li></ul>
<ul style="list-style-type: none"><li>Stabilize exposed soil with vegetation or mulching to minimize erosion and subsequent dust generation.</li></ul>
<ul style="list-style-type: none"><li>Construction vehicles will travel on paved roads within the Florida National Cemetery and vicinity at speeds at or below posted limits. This will minimize dust generated by vehicles and equipment on paved surfaces. On unpaved surfaces at the site, vehicle speeds will be maintained at or below 5 miles per hour to prevent dust generation of exposed soil. Haul trucks transporting soil will be covered with haul tarps.</li></ul>
<ul style="list-style-type: none"><li>Visually monitor all construction activities on a daily basis, and particularly during extended periods of dry weather; implement additional dust control measures as needed.</li></ul>
<b><i>CULTURAL RESOURCES</i></b>
<b>Construction and Operation</b>
<ul style="list-style-type: none"><li>Implement an “Inadvertent Discovery” plan: If prehistoric or historic artifacts that could be associated with Native American, early European, or American settlement are encountered at any time within the project site area, the VA will cease all activities involving subsurface disturbance in the vicinity of the discovery. The Florida Department of State, Division of Historical Resources, Compliance Review Section and federally-recognized Native American Tribes in the region who may attach religious or cultural significance to the property affected by the Proposed Action will be contacted, and project activities will not resume without verbal and/or written authorization. In the event that unmarked human remains are encountered during permitted activities, all work will stop immediately, and the proper authorities will be notified in accordance with Section 872.05, <i>Florida Statutes</i>.</li></ul>

<b><i>SOILS AND TOPOGRAPHY</i></b>
<b>Construction</b>
<ul style="list-style-type: none"> <li>▪ Design the expansion areas to comply with EISA 438 to the maximum extent technically feasible through engineering and design controls, such as minimizing the creation of new impervious surfaces, directing stormwater run-off to retention basins, and allowing precipitation to infiltrate into the ground surface to the maximum extent possible. Ensure the design is also consistent with Southwest Florida Water Management District (SWFWMD) requirement that the post-development site conditions have a combined site and soil stormwater storage equivalent to the pre-development condition (Chapter 40E-41 Basin Criteria of the Florida Administrative Code [FAC]).</li> </ul>
<ul style="list-style-type: none"> <li>▪ Develop a soil erosion and sediment control (SESC) plan for approval by the VA and prior to conducting any work.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Install and maintain sedimentation and erosion control measures, including the use of silt fencing, synthetic hay bales, specified loading and unloading areas, covering exposed soils during anticipated storm events, and revegetating soils with temporary and/or permanent non-invasive vegetation as soon as construction conditions allow.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Implement measures to prevent dust emissions from disturbed soil at each expansion area and on construction vehicles leaving and entering each area.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Revegetate disturbed areas as soon as construction is completed. Use native, non-invasive vegetation. Professionally maintain vegetation during operation.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Adhere to the terms of the FDEP National Pollutant Discharge Elimination System (NPDES) General Permit for Construction Activity and the SWFWMD Environmental Resource Permit (ERP) (Chapter 62-330, FAC).</li> </ul>
<ul style="list-style-type: none"> <li>▪ Maintain spill kits to rapidly respond to and limit impacts from accidental releases of equipment fluids or chemicals. Report releases of regulated quantities of regulated chemicals to the VA and FDEP. Perform cleanup according to applicable regulatory requirements.</li> </ul>
<b>Operation</b>
<ul style="list-style-type: none"> <li>▪ Conduct routine landscaping to ensure soil remains vegetated and stabilized to prevent erosion.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Temporarily stockpile excavated soil for individual burial sites in the West and South Areas and return to the burial site from which it was obtained. Sod new burial site to prevent erosion.</li> </ul>
<b><i>HYDROLOGY AND WATER QUALITY</i></b>
<b>Construction and Operation</b>
<ul style="list-style-type: none"> <li>▪ Implement the BMPs listed above for Geology, Soils, and Topography.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Utilize native, non-invasive, drought-resistant vegetation for area landscaping to reduce irrigation requirements.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Route stormwater run-off from impervious surfaces to designated stormwater retention and drainage areas.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the project area, to reduce the impacts of incidental releases of vehicle fluids to groundwater quality.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Design and operate the irrigation system to maximize efficiency and conserve water resources in accordance with the VA’s design guidelines and SOPs and in accordance with the existing SWFWMD Consumptive Water Use Permit and the pending modified permit (per VA application 200008675-006, submitted July 1, 2018).</li> </ul>

<b><i>HABITAT AND WILDLIFE</i></b>
<b>Construction</b>
<ul style="list-style-type: none"> <li>▪ Coordinate with USFWS prior to engaging in land development activities.</li> <li>▪ Survey suitable habitat within the proposed expansion area within the Project Study Area prior to construction.</li> <li>▪ In order to reduce the effect the Proposed Action may have on the eastern indigo snake, the VA would incorporate the Standard Protection Measures for the Eastern Indigo Snake in their construction plans, in addition to excavating all possible underground refugia (i.e., gopher tortoise burrows) prior to commencing construction. Coordinate with the USFWS on concurrence prior to initiating construction.</li> <li>▪ Conduct 15% and 100% surveys for gopher tortoise burrows according to FWC requirements prior to any clearing and earthwork.</li> <li>▪ Prior to construction of the proposed expansion project, conduct surveys for the presence of the Southeastern American kestrel. Coordinate with the FWC if any Southeastern American kestrel nests are observed.</li> </ul>
<b>Operation</b>
<ul style="list-style-type: none"> <li>▪ Utilize native, non-invasive, drought-resistant vegetation for area landscaping to reduce irrigation requirements.</li> <li>▪ Lawn areas will primarily be seeded or sodded with St. Augustine grass, while perimeter shrubs and trees will include <i>Loropetalum</i> cultivars and Crepe Myrtle.</li> </ul>
<b><i>NOISE</i></b>
<b>Construction</b>
<ul style="list-style-type: none"> <li>▪ Schedule construction activities to minimize impacts to interment ceremonies to the extent possible unless there is a specific activity that would directly impact the current operation of the cemetery, in which case schedule the activity outside of the normal construction schedule.</li> <li>▪ Equip construction equipment with noise dampening equipment (mufflers, noise shields) and turn equipment off when not in use.</li> <li>▪ Comply with OSHA requirements to protect workers' hearing around loud equipment.</li> </ul>
<b><i>FLOODPLAINS</i></b>
<b>Construction and Operation</b>
<ul style="list-style-type: none"> <li>▪ Ensure any future improvements are above the 100-year floodplain base elevation in the West Area, and avoid development within the 500-year floodplain in the western portion of the West Area.</li> </ul>
<b><i>SOLID WASTE AND HAZARDOUS MATERIALS</i></b>
<b>Construction</b>
<ul style="list-style-type: none"> <li>▪ Reutilize excavated soils on-site in accordance with site design specifications. Utilize excess soils off-site.</li> <li>▪ Recycle excess construction materials off-site.</li> <li>▪ Manage solid and hazardous waste according to the VA's solid and hazardous materials SOPs and management measures specified in NCA Master Construction Specifications, and applicable federal and state laws.</li> <li>▪ Implement management measures for incidental releases specified under Soils.</li> </ul>
<b>Operation</b>
<ul style="list-style-type: none"> <li>▪ Manage solid wastes in designated areas and establish routine pickup and disposal to appropriate landfill facilities by qualified vendors, consistent with current practices at the Florida National Cemetery.</li> <li>▪ Apply pesticides/herbicides according to label instructions by licensed applicators.</li> </ul>

***TRANSPORTATION***

**Construction**

- Construction vehicles will use the existing maintenance road (along CR 476B) to enter and exit the Florida National Cemetery. If required, flaggers will be utilized to notify oncoming traffic of slower construction vehicles entering or exiting CR 476B from the maintenance road.
- Stage construction equipment at the site to ensure construction equipment is not readily visible to visitors and maintains the solemnity of the Florida National Cemetery.
- Establish gravel areas at the exit of construction areas to remove dirt/soil from construction vehicle tires prior to entering the roadways within the Florida National Cemetery.

***UTILITIES***

**Operation**

- Pending approval of the modified Consumptive Water Use Permit application to SWFWMD submitted on July 1, 2018 (permit 20008675-006), follow the water conservation management plan activities and groundwater water withdrawal limitations under the existing permit, and all requirements under the new permit upon issuance.