

**FINDING OF NO SIGNIFICANT IMPACT (FONSI)**  
**U.S. DEPARTMENT OF VETERANS AFFAIRS**  
**PROPOSED CONSTRUCTION AND OPERATION OF THE**  
**PHASE 2 EXPANSION**  
**GREAT LAKES NATIONAL CEMETERY**  
**HOLLY TOWNSHIP, OAKLAND COUNTY, MICHIGAN**

**1 INTRODUCTION**

The U.S. Department of Veterans Affairs (VA), National Cemetery Administration (NCA), completed a Site-Specific Environmental Assessment (SEA), included herein in its entirety by reference, to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Proposed Action to construct and operate the Phase 2 expansion at the Great Lakes National Cemetery (GLNC) at 4200 Belford Road, Holly Township, Oakland County, Michigan.

VA prepared the SEA 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).

**1.1 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.

The Veterans Millennium Health Care and Benefits Act of 1999 required VA to establish six additional National Cemeteries in areas of the U.S. where burial needs were greatest. One of these six areas was in Michigan, specifically the Detroit metropolitan area. Accordingly, in August 2001 NCA completed an Environmental Assessment (EA) analyzing the initial site selection and the reasonably foreseeable impacts associated with the phased construction and operation of a new national cemetery in the Detroit metropolitan area. Four different sites were identified, and the potential impact from developing each site as a typical National Cemetery was assessed and documented. Based on the EA and a subsequent FONSI, NCA selected a 544-acre property in Holly Township.

In 2002, VA purchased the property that would become GLNC and began preparing a Master Plan for the design of the phased build-out of the property. The Phase 1 development was completed in 2005 and GLNC opened for burials in October of that same year. The Phase 1 development is located in the northwestern portion of GLNC and provides 18 burial sections, four columbarium complexes, an assembly area with associated parking, a combination Public Information Complex/Administrative Building, three committal service shelters, a maintenance complex and maintenance yard, an honor guard building, a memorial walk, and associated roadways, infrastructure, site furnishings, and utilities. Much of the infrastructure was designed to support future development phases.

Due to gravesite depletion, VA in 2018 determined that an expansion of GLNC was necessary to continue providing burial benefits to Veterans and their families in the Detroit metropolitan area. VA projects that if an expansion does not occur there will be gravesite depletion of casketed gravesites by January 2043 columbarium niche cremation sites by August 2024, and in-ground cremation gravesites by July 2023.

Under the Proposed Action, VA would implement the Phase 2 expansion to address the need for increased burial capacity for the next approximately 10 years.

VA prepared this FONSI and the Final SEA, incorporated herein in its entirety, 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).

## **1.2 Purpose and Need**

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

The Proposed Action is *needed* to allow NCA to continue meeting its goal of providing eligible Veterans and their families with reasonable access to VA burial options and address the depletion of gravesites.

## **2 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES Proposed Action**

Under the Proposed Action, VA would implement the Phase 2 expansion within an approximately 30-acre area in the central western portion of GLNC, with additional improvements to existing infrastructure within an approximately 20-acre portion of the existing Phase 1 cemetery. The Phase 2 expansion would provide an approximately 10 years of new burial capacity at GLNC.

Specific elements of the Proposed Action are outlined below and provided in greater detail in the SEA.

- New Burial Sections – The Phase 2 expansion would provide approximately 28,570 new gravesites in 16 new burial sections, including:
- In-Ground Burial Section – New in-ground burial sections would provide approximately 9,600 pre-placed double depth crypts in five burial sections; 300 over-sized pre-placed double depth crypts in one burial section west of the existing Columbarium C; and 6,600 in-ground cremation sites in eight burial sections.
- Columbarium – A new columbarium complex would provide approximately 12,070 columbarium niches for cremation urns on a dedicated road with associated parking.
- Cortege Lane Expansion – The existing cortege lanes would be expanded to allow for the construction of two additional lanes and one pass-through lane. The lanes would be expanded to the east into the existing lawn area adjacent to the PIC/Administrative building.
- Assembly Area Parking – Additional parking spaces would be provided at the existing assembly area to accommodate more automobiles. Cortege lanes would be expanded to the south, southeast, and east of the existing parking area. The existing service road and sidewalks would be adjusted to accommodate for the new parking lot layout.
- Committal Service Shelters – A new committal service shelter would be constructed off the new Phase 2 roadway. Parking would be expanded at the existing Committal Shelters 1 and 2. A satellite parking lot would be constructed at Committal Shelter 1 to accommodate honor guard parking needs. A new sidewalk would be constructed to allow pedestrian access between the parking lot and the existing honor guard building. New honor guard parking spaces would also be provided northwest of Committal Shelter 2.

- Roadway Expansion and Improvements – The cemetery roadways would be extended to the new columbarium complex, committal service shelter, and burial sections. New roadways would avoid wetland impacts.
- Memorial Walk Expansion – The memorial walkway that runs parallel to Fagan Lake would be extended to connect to existing Committal Shelter 3, and to the west to connect with the walkway that currently encircles Memorial Section 1.
- Grading – New burial sections would be graded in accordance with NCA site design guidelines. Associated drainage systems would be provided to ensure proper stormwater management and avoidance of ponding/flooding.
- Landscaping – The expansion area would be landscaped to provide privacy and in a manner that is consistent with the existing cemetery. Planted vegetation would include native, non-invasive varieties of turf grass, including Kentucky bluegrass and perennial ryegrass.
- Environmentally Sensitive Design - The Phase 2 expansion would impact approximately 0.1 acre of existing forested habitat and 0.02 acres of emergent wetlands. To minimize these impacts, approximately one acre of new tree and shrub canopy would be created within the Phase 2 expansion area. Many of these plantings provide habitat for pollinator species, including insects, birds, and bats.
- Irrigation – Operation of the Phase 2 expansion would require consumption of water to irrigate the new landscaped areas. The existing looped mainline irrigation system would be extended to the new burial sections. Fagan Lake would continue to be the source for irrigation water. Potable water would not be used to supply irrigation water.
- Energy Efficiency - The Proposed Action includes numerous energy efficient systems that increase sustainability and limit energy use associated with operating existing and proposed Phase 2 expansion infrastructure at GLNC. Energy efficient systems specified for the Proposed Action include low-water plumbing; high-efficiency LED lighting and automated lighting controls; mechanical fan motor upgrades; and architectural requirements to comply with federal mandates and VA policies for sustainable construction, including thermal insulation, doors and frames, and windows.

The Proposed Action would extend the longevity of GLNC for approximately 10 years and accommodate long-term burial needs of future generations of Veterans and their families in the Detroit metropolitan area. Therefore, the Proposed Action would meet the purpose and need for action. No other reasonable action alternatives were carried forward in the analysis in the SEA.

## **2.2 No Action Alternative**

VA evaluated a No Action alternative as part of the SEA, as required under the CEQ Regulations (40 CFR 1502.14). Under the No Action Alternative, the Proposed Action would not be implemented, and long-term, reasonable access to burial benefits would not be provided to Veterans and their families living in the Detroit metropolitan area.

Currently, the closest National Cemetery to GLNC is the Fort Custer National Cemetery in Augusta, MI, approximately 134 miles from GLNC. National Cemeteries located more than 75 miles from the Detroit metropolitan area are considered to be located beyond a reasonable distance of Veterans and their families in this region. Therefore, Veterans and their families residing in the Detroit metropolitan area would be

underserved once the GLNC reaches full capacity. If Veterans and their families must resort to private burials, they are deprived the honor and privilege bestowed upon them by a grateful nation for their service to their country.

While the No Action Alternative would not satisfy the purpose of or need for action, it was retained to reflect the status quo and provide a comparative baseline against which to evaluate the effects of the Proposed Action.

### **3 Summary of Environmental Consequences**

In assessing environmental impacts of the Proposed Action VA determined there would be no significant adverse impacts, considered individually or cumulatively, from the construction or operation of the Proposed Action to the environmental resources analyzed in detail in the SEA. Any less-than-significant adverse impacts to resources are summarized below and are described in more detail in the SEA.

Additionally, construction or operation of the Proposed Action would have no impact or a negligible impact on air quality, geology, topography, noise, land use, floodplains and coastal zone management areas, solid waste and hazardous materials, transportation, utilities, or environmental justice. Additionally, implementing the Proposed Action would not generate substantial public controversy because the community anticipates that VA would extend the longevity of the GLNC through phased expansions as described in the GLNC Master Plan.

#### **3.1 Impacts Anticipated During Construction**

Construction activities associated with the Proposed Action would occur over an approximately 24-month period and include land clearing, filling, grading, construction of interment areas and roadways, construction of a new committal service shelter, extension of irrigation lines, landscaping, and improvements to selected existing infrastructure. Where construction activities cannot entirely avoid impacting the environment, the Proposed Action incorporates Best Management Practices (BMPs) to minimize anticipated impacts to less-than-significant adverse levels to resources including aesthetics, soils, wildlife and habitat, and wetlands. Impacts to these resource topics are summarized in the following paragraphs.

**Aesthetics.** Construction of the Proposed Action would temporarily impact the aesthetic quality of the western central and northern portions of GLNC due to the presence of construction equipment and materials, and unfinished stages of site preparation and construction. To minimize these impacts, privacy fencing would be erected around construction areas, while BMPs would be implemented to minimize fugitive dust generation by using water trucks for dust suppression; removing loose soil from construction equipment before exiting the construction area; installing and maintaining gravel pads at the construction exits; and planting native, non-invasive vegetation to stabilize exposed soils immediately following construction.

**Soils.** Construction of the Proposed Action would require land clearing and grading to prepare the ground for burial sections, roadways, and the new committal shelter. Although much of the Phase 2 expansion area is under agricultural production (without a vegetative cover outside the growing season), grading would impact soils in areas not under agricultural production by removing the vegetative cover and exposing the underlying soils. Exposed soils may be susceptible to erosion and may lead to sedimentation of nearby surface waters. To minimize these potential adverse impacts, BMPs specified in the Soil Erosion and Sedimentation Control Part 91 permit (issued by the Oakland County Water Resources Commission), as well as the National Pollutant Discharge Elimination System (NPDES) permit (issued by Michigan Department of Environment, Great Lakes and Energy [EGLE]) would be implemented for erosion control

and stormwater runoff management, including the use of silt fencing, haybales, and revegetating exposed soils immediately following construction. Conversion of farmland to non-agricultural use would have a negligible impact on overall farmland acreage in Oakland County, Michigan.

**Wildlife and Habitat.** The Proposed Action would permanently convert approximately 30-acres of land to landscaped cemetery grounds. This would remove existing potential habitat for the federally listed Indiana bat and northern-long eared bat (NLEB). To minimize impacts to the Indiana bat, VA would adhere to the U.S. Fish and Wildlife Service (USFWS) time of year restrictions for tree clearing, by avoiding tree clearing from 1 April through 15 October, and from 1 June to 31 July to avoid prohibited incidental take of NLEBs during the pup season. USFWS has concurred with VA's determination that the Proposed Action would not result in any disturbance to an active bald eagle nest located near the Phase 2 expansion area at GLNC.

**Wetlands.** VA obtained a Michigan EGLE wetlands permit for construction of an access road to the new columbarium complex that would require filling 0.02 acres of emergent wetland, and installing a 48-foot, 18-inch wetland equalization culvert within the new columbarium access road in order to provide water level equalization and free flow of surface water and/or movement of organisms between portions of the wetland system within the Phase 2 expansion area. Installation and maintenance of the culvert would ensure adverse impacts to other wetlands at and adjacent to the Phase 2 expansion area are minimized.

### 3.2 Impacts During Operation

**Aesthetics.** Operation of the Phase 2 cemetery would provide direct, long-term, moderately beneficial aesthetic effects within the proposed Phase 2 expansion area. The Proposed Action would convert the Phase 2 expansion area from agricultural fields into a park-like setting, including professionally maintained landscaped grounds, winding roadways, and peaceful spaces for families and visitors to pay their respects.

Operation of the Proposed Action would have a beneficial but less-than-significant impact on socioeconomics, transportation and parking. Additionally, operation of the Phase 4 expansion would have a long-term, significant beneficial impact on community services by providing approximately 12,000 new interment sites and extending the longevity of the MNC for approximately 10 years.

## 4 Cumulative Impacts

Impacts from implementing the Proposed Action in combination with those from past, present, and reasonably foreseeable future development at and in the vicinity of GLNC is not expected to generate additional adverse impacts or increase the intensity of impacts above a less-than-significant level on resources analyzed in this SEA.

According to the 2017 revised Holly Township Master Plan, the areas directly surrounding GLNC will remain as rural estate and low-density residential development for the foreseeable future. Additionally, there are no major projects in the vicinity of GLNC as identified in the Master Plan that would have adverse cumulative impacts when considered with the Proposed Action. Future reasonably foreseeable development projects within the larger Oakland County that may have cumulative impacts when considered with the Proposed Action include the Interstate 75 Corridor Project. This project encompasses approximately 18 miles of freeway within Oakland County. When considered with the Proposed Action, the I-75 Corridor Project has the potential to result in cumulative impacts on wetlands and soils. However, the adoption of BMPs and the distance between the projects and relatively minimal impacts when considered with the greater Oakland County area, would ensure that they are kept at less-than-significant levels.

The Proposed Action is not anticipated to induce any additional growth in the vicinity of the GLNC. Further, the area for the proposed expansion is designated and permitted for future development as a

cemetery and is within the existing boundaries of VA's property. The Proposed Action is consistent with current and anticipated land uses at the GLNC.

For these reasons, and the adoption of BMPs and impact avoidance and minimization measures, the Proposed Action would have no significant adverse impacts, on an individual or cumulative basis, to the environmental resources analyzed in the SEA.

**5 Impact Minimization Measures.**

To ensure impacts to the environment remain at less-than-significant adverse levels, VA would implement the management, avoidance, and regulatory compliance measures identified in the SEA, which are summarized in Appendix A in this FONSI.

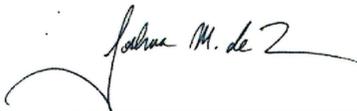
**6 Regulatory Agency, Native American Tribes, and Public Comment**

VA involved regulatory agencies and the public in decision-making for this Proposed Action. VA published a Notice of Availability (NOA) announcing the release of a Draft SEA for a 30-day comment period in the *Oakland Press* on August 23 and 25, 2019. VA mailed the NOA to selected federal, state, and local regulatory agencies and Native American Tribes. As stated in the NOA, the Draft SEA was published and available for review at GLNC; the Holly Township Library, 1116 N Saginaw Street, Holly, MI 48442; and available for electronic download at <http://www.cem.va.gov/cem/EA.asp>. An affidavit of publication of the Draft SEA NOA is provided in Appendix C of the Final SEA.

No comments were received from the public during the Draft SEA 30-day review period. The US Army Corps of Engineers (USACE) provided comments reiterating the wetland and floodplain regulations; USACE did not express opposition to the Proposed Action. The US Environmental Protection Agency (USEPA) provided comments relating to promoting pollinator species and energy efficiency; USEPA did not express opposition to the Proposed Action. No comments were received from Native American Tribes. Copies of correspondence are included in Appendix B of the Final SEA.

**7 Finding of No Significant Impact**

As a result of the analysis of impacts in the Final SEA, summarized and incorporated herein by reference in its entirety, it is the conclusion of VA that, with the implementation of appropriate management, avoidance, and regulatory compliance measures, included as Appendix A in this FONSI, 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)(c) 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.



Executive Director, Midwest District, National Cemetery Administration

12/2/2019

Date

**FERNANDO L.  
FERNANDEZ 336237**

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Mr. Fernando L. Fernández, REM  
Environmental Engineer  
VA Construction and Facilities Management Office

12/2/2019

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>
Control fugitive dust emissions through routine construction BMPs, including using water trucks to prevent dust emissions, and install gravel-covered pads to remove dirt from the tires of vehicles leaving the Proposed Action construction site.
Erect temporary privacy fence around the construction zone, particularly near the boundary between the Phase 2 expansion area and the existing Phase 1 columbarium complex.
<b>Operation</b>
Perform 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).
<b><i>AIR QUALITY</i></b>
<b>Construction</b>
Reduce emissions associated with on-road construction vehicles by consolidating material deliveries and stage heavy equipment on-site to reduce mobilizations.
Implement dust suppression methods to include application of water and construction scheduling (avoid earthwork during extremely windy and dry periods or when there is an emergency weather advisory). Additionally, haul tarps would be used to cover any soils transported to or from the construction site.
Stabilize exposed soil with native, non-invasive vegetation or mulching to minimize erosion and potential dust generation.
Limit construction vehicle speeds on paved roads within GLNC and vicinity at or below posted limits to minimize dust generation. On unpaved surfaces, including Belford Road and Fagan Road, maintain vehicle speeds at or below posted speed limits to minimize dust generation from exposed soils.
Visually monitor all construction activities on a daily basis, particularly during extended periods of dry weather; implement additional dust control measures as needed.
Limit engine idling to less than five minutes and implement USEPA-recommended diesel controls to the extent practicable, including the use of clean diesel through add-on control technologies such as diesel particulate filters and diesel oxidation catalysts, repowers, or newer, cleaner equipment.
<b><i>GEOLOGY, SOILS, AND TOPOGRAPHY</i></b>
<b>Construction</b>
Obtain the Part 91 permit under Part 91, Soil Erosion and Sedimentation Control, of the Michigan Natural Resources and Environmental Protection Act from the Oakland County Water Resources Commission. Submit the Part 91 permit, approved SESC plan, and Notice of Coverage application to EGLE Water Resources Division for coverage under the NPDES permitting program.
Install and maintain sedimentation and erosion control measures specified in the SWPPP and SESC, 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 native, non-invasive vegetation as soon as construction conditions allow.
Reuse suitable excess soils as a source of on-site fill to the maximum extent practicable.
<b>Operation</b>
Conduct routine landscaping to ensure soil remains vegetated and stabilized to prevent erosion.
Temporarily stockpile excavated soil for individual burial sites at the maintenance area (or other designed on-site storage area). Sod new burial sites to prevent erosion of soil.

**CULTURAL RESOURCES****Construction**

Comply with the NHPA, Archaeological Resources Protection Act of 1979, NAGPRA, American Indian Religious Freedom Act, 36 CFR Part 79, and EO 13007 Indian Sacred Sites.

In the unlikely event that human remains or cultural resources are encountered during construction, an “Inadvertent Discovery” plan would be implemented to avoid adverse impacts. Under this plan, if prehistoric or historic artifacts or human remains that could be associated with Native American, early European, or American settlement are encountered at any time within the project site area, all activities involving subsurface disturbance in the vicinity of the discovery would cease until VA and the MI SHPO are notified, such that items are properly identified and treated according to applicable federal, state, and tribal laws.

**Operation**

Implement the “Inadvertent Discovery” plan described above in the case that excavations uncover human remains or other cultural items.

**WILDLIFE AND HABITAT****Construction**

Adhere to USFWS avoidance measures for the Indiana bat by implementing seasonal tree clearing restrictions from 1 April through 15 October.

Adhere to USFWS avoidance measures for the northern long-eared bat by implementing seasonal tree clearing restrictions from 1 June through 31 July.

Adhere to USFWS Bald Eagle Avoidance Measures

Plant approximately one acre of new tree and shrub canopy within the Phase 2 expansion area; use species that promote pollinator species to the extent practicable.

**Operation**

Utilize native, non-invasive, drought-resistant vegetation for area landscaping to reduce irrigation requirements.

Landscape lawn areas primarily with turf grass, including Kentucky bluegrass and perennial ryegrass.

Do not subject trees and shrubs to direct herbicide and pesticide applications.

**NOISE****Construction**

Coordinate with the GLNC National Cemetery Administrator prior to mobilizing construction machinery through the Phase 1 cemetery to avoid and minimize noise-related disturbances to ongoing memorial services.

Schedule construction activities to minimize impacts to memorial services to the extent possible, unless there is a specific activity that would directly impact the current operation of the cemetery, in which case the activity would be scheduled outside of the normal construction schedule.

Comply with OSHA requirements to protect hearing of workers around loud construction equipment.

Use properly maintained and muffled vehicles and equipment.

Locate stationary operating equipment as far away from surrounding residents as possible. Shut down heavy equipment and other noise emitters when they are not in use.

**HYDROLOGY AND WATER QUALITY****Construction and Operation**

Implement the BMPs listed above for Geology, Soils, and Topography to minimize sediment-laden runoff from reaching wetlands and surface water bodies.

Develop a site design that accounts for pre/post 100-year volume stormwater drainage and retention at a minimum.

Utilize native, non-invasive, drought-resistant vegetation for area landscaping to reduce irrigation volumes.

Implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the project area, to reduce the impact of incidental releases of petroleum-based fluids from construction and operational equipment to groundwater or surface water quality.
Locate machinery servicing and refueling areas away from streambeds and washes to reduce the possibility and minimize the impacts of accidental spills or discharges.
During operations, pesticide/herbicide applications (as part of routine maintenance activities) would be conducted to the minimum extent necessary and in accordance with manufacturer specifications, to avoid impacts to underlying groundwater resources.
<b><i>FLOODPLAINS, WETLANDS AND COASTAL ZONE MANAGEMENT</i></b>
<b>Construction and Operation</b>
Comply with the conditions of the EGLE WRD permit for the filling of 0.02 acres of emergent wetland and installation of a wetland equalization culvert.
Avoid disturbance to other wetlands outside of the development area, as previously described for Soils and Habitat.
Prevent surface water runoff to the onsite and adjacent surface waters including Fagan Lake and Round Lake and avoid interaction with onsite and adjacent surface waters.
<b><i>SOLID WASTE AND HAZARDOUS MATERIALS</i></b>
<b>Construction</b>
Recycle excess construction materials to the maximum extent practicable.
<b>Operation</b>
Manage solid wastes in designated areas and establish routine pickup and disposal to appropriate landfill facilities by qualified vendors.
Manage solid and hazardous wastes according to VA's solid and hazardous materials SOPs and management measures specified in NCA Master Construction Specifications, and applicable federal and state laws.
<b><i>TRANSPORTATION AND PARKING</i></b>
<b>Construction</b>
Coordinate with the GLNC Administrator to identify the preferred entrance and exit point at GLNC, relative to daily mobilization of construction equipment and workers associated with the Phase 2 expansion.
Coordinate with the GLNC Administrator prior to mobilizing construction machinery through the Phase 1 cemetery to avoid interfering with cortege travel.
Stage construction equipment where it is not readily visible to visitors, maintaining the solemnity of the park-like setting of the Phase 1 GLNC.
If warranted, utilize flaggers to notify oncoming traffic of slower construction vehicles entering or exiting the cemetery from Belford Road and/or Fagan Road.
<b><i>UTILITIES</i></b>
<b>Construction</b>
Adhere to Phase 2 design plans when extending the irrigation utility to the Phase 2 expansion area and creating stormwater management systems.
<b>Operation</b>
Utilize Fagan Lake to supply irrigation water for newly landscaped grounds within the Phase 2 expansion area.
Maintain stormwater management systems in good working order.