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Supplemental Environmental Assessment: Expansion and Improvements at Ohio Western Reserve National Cemetery Rittman, Ohio

Prepared for:

U.S. Department of Veterans Affairs
Ohio Western Reserve National Cemetery
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EXECUTIVE SUMMARY

In July 2015, the Department of Veterans Affairs (VA) completed an environmental assessment (EA) to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with expanding and improving the Ohio Western Reserve National Cemetery (OWRNC). The project proposed in 2015 would cover approximately 30 acres within the boundary of OWRNC property and provide for 10 years of interment capacity. The 2015 EA concluded that no significant impacts would occur and the VA issued a finding of no significant impact. The project was put on hold before construction began. In 2018, the project was relaunched and the scope was adjusted slightly to accommodate new components including a new honor guard building and general site improvements to existing structures, roadways, and hardscapes.

In this supplemental environmental assessment (SEA), the VA, National Cemetery Administration (NCA) identifies, analyzes, and documents the potential physical, environmental, and cultural impacts associated with the proposed additions to the original project scope.

The project purpose and need remain the same as defined in the 2015 EA:

The **purpose** of the Proposed Action is to continue to enable the NCA to provide eligible veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs in the Cleveland region for the next 10 years.

The Proposed Action is **needed** to meet the NCA's goal of providing eligible veterans and their families with reasonable access to VA interment options.

Two alternatives are analyzed in this SEA:

- The **Proposed Action** is to expand and improve the OWRNC within the existing cemetery property to provide 10 years of interment capacity. The proposed action encompasses items evaluated in the 2015 EA as well as the additions to the project scope, which include a new honor guard building and general site improvements to existing structures, roadways, and hardscapes.

- The **No Action** is to reject the proposed changes to the project scope including construction of a new honor guard building and general site improvements to existing structures, roadways, and hardscapes.

Table 1 lists the resource areas analyzed in the 2015 EA and this SEA and summarizes the potential impacts of the Proposed Action and the No Action alternatives. A definition of the criteria used for analysis of potential impacts and the detailed analyses for resource areas are included in Section 3. Resource areas that are not subject to change from the 2015 assessment will not be further analyzed or detailed in this document.

Table 1. Summary of Resource Area Impacts

Resource/Issue	Proposed Action	No Action	Change from 2015 EA
Meets Purpose and Need for Action	Yes	No	- New honor guard building - General site improvements
Aesthetics	Short-term, direct, minor, adverse impact from presence of heavy equipment and unfinished work during construction.	None	No change
Air Quality	Short-term, direct, minor, adverse impact from particulate emissions during construction. Long-term, direct, minor, adverse operational impacts from burial activities. Emissions would comply with all permit requirements and regulations.	None	No change
Cultural Resources	Outside of the national cemetery itself, the Proposed Action would not impact any historic properties. Consistency with NCA design standards for national cemeteries would ensure no adverse impact to the NRHP-eligible national cemetery.	None	No change
Geology, Topography, and Soils	Short-term, direct, minor, adverse impact from erosion sedimentation during construction and operation; impacts would be minimized through best management practices and conformance with National Pollutant Discharge Elimination System permit requirements.	None	No change
Hydrology and Water Quality	Short-term, direct, minor, adverse impact on surface water during construction from potential sedimentation of runoff; impact would be minimized through best management practices and conformance with National Pollutant Discharge Elimination System permit requirements.	None	No change
Wildlife and Habitat	Short- and long-term, direct, minor, adverse impacts on wildlife species and habitat due to disturbance during construction and long-term conversion of habitat to landscaped grounds. No impact to listed species due to avoidance measures.	None	No change

Noise	Short-term, direct, minor, adverse impact from construction noise. Long-term, direct, minor, adverse intermittent noise impacts during operation from ceremonial M-16 rifle salutes and grounds maintenance.	None	No change
Land Use	Long-term, direct, minor, adverse impact from pushing back the edge of a wooded area from 20 to 200 feet in some sections of the expansion area.	None	No change
Floodplains, Wetlands, and Coastal Zone Management	Long-term, direct, minor, adverse impacts from filling 0.16 acres of isolated wetlands. Wetlands on site are non-jurisdictional, and not regulated by the Army Corps of Engineers under the federal Clean Water Act Section 404. Impacts to isolated wetlands would be minimized by complying with the terms of an Ohio Environmental Protection Agency - Level One Isolated Wetland Permit.	None	No change
Socioeconomics and Environmental Justice	No adverse impact. Short-term, direct, negligible, beneficial, localized impacts from construction worker hiring.	None	No change
Community Services	Long-term, direct, significant, beneficial impact by extending the longevity of the Ohio Western Reserve National Cemetery, and providing burial services for Veterans and their families in the Cleveland region. No adverse impact on other community services.	Long-term, direct, significant, adverse, impact after current capacity is reached and veterans' families must travel long distances for burial and visitation.	No change
Solid and Hazardous Materials	Negligible generation of solid waste during construction, and continued generation at current levels from operations. No adverse impact.	None	No change
Transportation and Parking	Short-term, direct, minor, adverse impact from increased construction traffic traveling on roads near and within the national cemetery. No operational transportation or parking impact.	None	No change
Utilities	No adverse impact.	None	No change
Potential for Generating Substantial Controversy	None identified.	None	No change

Section 1.0 Introduction

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) honors veterans and their families with final resting places in national shrines and with lasting tributes that commemorate their service and sacrifice to the nation. VA's Office of Construction and Facility Management's mission is to advance VA's mission in support of the nation's veterans by planning, designing, constructing, and acquiring major facilities and setting design and construction standards.

In 1992, NCA developed an environmental impact statement (EIS) for the construction and operation of a new national cemetery in Rittman, Ohio (VA 1992). The cemetery is formally known as Ohio Western Reserve National Cemetery (OWRNC) and serves the Cleveland region. Approximately 65 acres of the 273-acre property are currently developed for burial and related operations.

In 2015, VA completed an Environmental Assessment (EA) to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with expanding and improving OWRNC (VA 2015). The project proposed in 2015 would cover approximately 30 acres within the cemetery property and provide for 10 more years of interment capacity including casket, columbarium, and in-ground cremation sites. The project was also proposed to improve OWRNC by providing a committal shelter, supporting infrastructure, parking, irrigation, landscaping, visitor amenities, signage, and operational facility improvements. The 2015 EA concluded that no significant impacts would occur and the VA issued a finding of no significant impact.

The project was put on hold before construction began. In 2018, the project was relaunched and the scope was modified to accommodate new components including a new honor guard building and general site improvements to existing structures (administration building, committal shelters, wash bay building, public information center and restrooms), roadways (installation of curb and gutter on existing roadways and paving an existing maintenance road), and hardscapes (replacing pavers with concrete in the flag assembly area, public information center, and columbarium areas).

At the outlook of the planning process for the current proposed project, the VA considered placing a committal shelter at a location on the cemetery property that is adjacent to a creek. At that location along the creek, there is a bend with a severely eroding bank. Due to the condition of the streambank, the VA considered including a stabilization component to the project. With that, scoping letters that were sent to potentially interested agencies and tribes described the proposed project with a streambank stabilization component. However, the planned committal shelter has since been relocated to an area outside the vicinity of the creek, rendering the streambank stabilization component of the project unnecessary. Therefore, it will no longer be included as part of the proposed action or analyzed further.

In this supplemental environmental analysis (SEA), VA identifies, analyzes, and documents any potential changes in physical, environmental, cultural, and socioeconomic impacts associated with the proposed changes in the project scope from the expansion and improvement project assessed in the 2015 environmental assessment.

This SEA has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 United States Code 4321 et seq.), the President's Council on Environmental Quality (CEQ) "Regulations Implementing the Procedural Provisions of NEPA" (40 Code of Federal Regulations [CFR] 1500-1508), VA's NEPA regulations titled, "Environmental Effects of the Department of Veteran's Affairs Actions (38 CFR Part 26), and VA's NEPA Interim Guidance for Projects (VA 2010). These requirements specify that VA must evaluate the potential environmental impacts of VA facilities, operations, and related funding decisions prior to taking action. VA must apply the NEPA review process and use the information

to make an informed decision prior to undertaking a proposed action. An EA provides sufficient evidence and analysis for determining whether an action would cause significant environmental impacts (requiring an EIS). A SEA is prepared when important new information becomes available or the agency makes substantial changes in the proposed action that are relevant to environmental concerns after an EA or EIS is prepared (40 CFR 1502.9). If the agency determines that an action would not cause significant environmental impacts, the agency can issue a finding of no significant impact (FONSI) (40 CFR 1508.9). A FONSI is a decision document that briefly presents the reasons why an action would not have a significant effect on the human environment (40 CFR 1508.13). As required by NEPA and the implementing regulations from CEQ and VA, the alternative of taking no action is evaluated, providing a baseline for comparison of potential impacts from the action alternative(s).

1.1 Background

OWRNC is located in Medina County, approximately 50 miles south of Cleveland, at 10175 Rawiga Road, Rittman, Ohio, 44270. Figure A depicts the general location and site boundary. In October 1992, VA finalized the EIS identifying the site as the environmentally preferred alternative for the new national cemetery to serve the Cleveland region. The property was acquired, initial construction was completed, and operations began in June 2000. Approximately 65 acres of the 273-acre property are currently developed for burial and related operations. The remainder of the property consists of an area of leased farmland, areas of native vegetation consisting of grasses and low shrubs, and a wooded area along Tommy Run (a creek that bisects the property from north to south).

1.2 Purpose and Need

The **Proposed Action** is to expand and improve the OWRNC within the existing cemetery property to provide 10 years of interment capacity. The proposed action encompasses items evaluated in the 2015 EA as well as the additions to the project scope, which include a new honor guard building and general site improvements to existing structures, roadways, and hardscapes.

The **No Action** is to reject the proposed changes to the project scope including construction of a new honor guard building and general site improvements to existing structures, roadways, and hardscapes.

1.3 Decision-Making

VA, as a federal agency, is required to incorporate environmental considerations into their decision-making process for the actions they propose to undertake. This is done in accordance with the previously identified laws, regulations, and guidance.

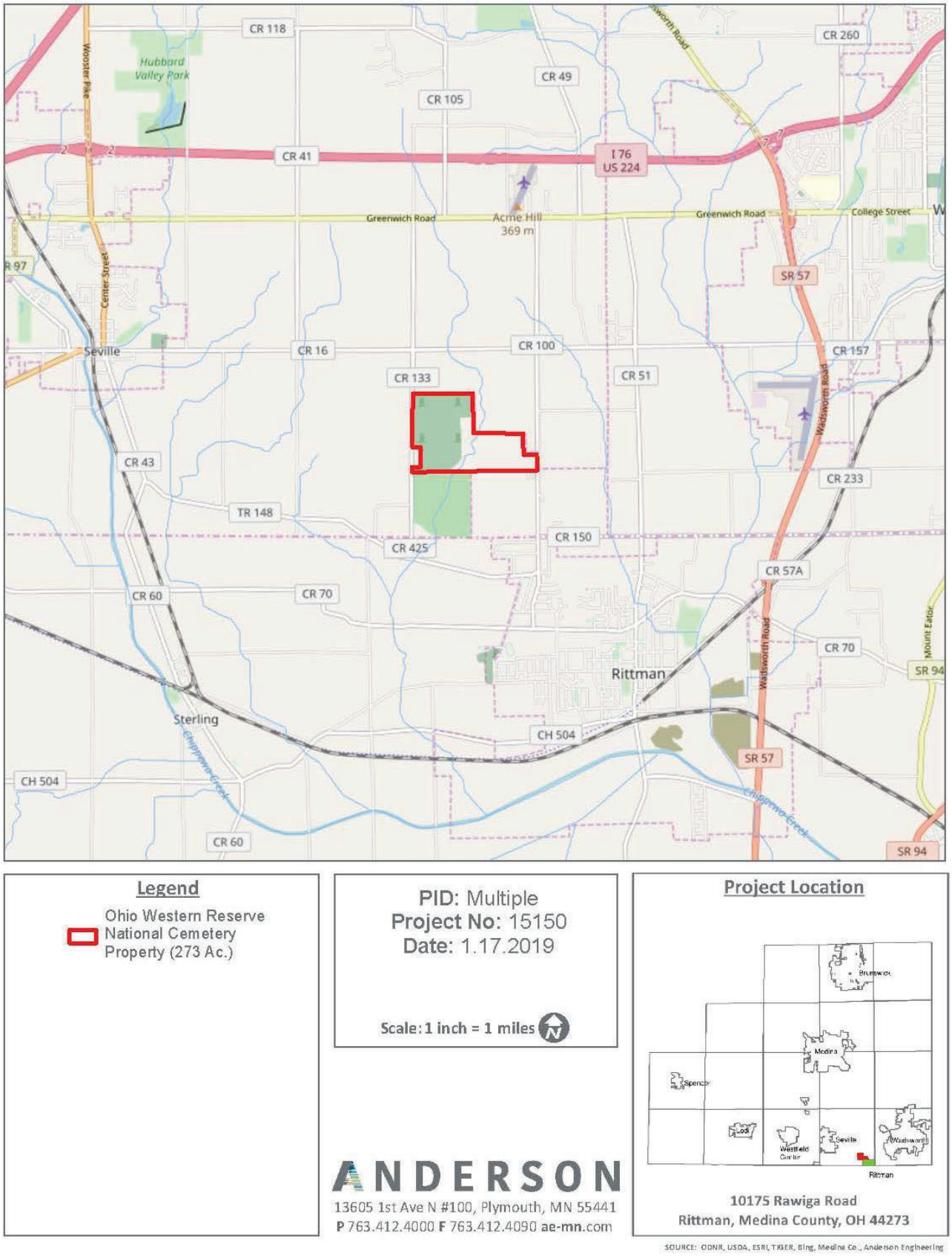
This SEA has been developed to:

- Evaluate the possible environmental effects of the Proposed Action and No Action alternative, as well as methods to reduce these effects
- Inform decision-makers and the public of the possible effects
- Allow for public input into the decision-making process
- Allow for informed decision-making by the federal government
- Document the NEPA process

This NEPA process includes identifying the actions that the government would commit to undertake to minimize environmental effects, as required under NEPA CEQ regulations and VA's NEPA regulations.

The intent of the document is to provide VA with appropriate information to make an informed decision on whether to implement the Proposed Action or the No Action alternative.

Figure A. General Location Map



Section 2.0 Proposed Action and Alternatives

2.1 Proposed Action

The Proposed Action is to expand and improve the OWRNC within the existing cemetery property to provide an additional 10 years of interment capacity. The proposed action includes items evaluated in the 2015 EA as well as the additions to the project scope. Figure B shows an overview of the project parameters and the changes in scope from the 2015 proposed action. The proposed expansion and improvements in 2015 included columbarium, crypt sections, garden niches, a committal shelter, roadways and parking, and landscaping. The new items that were added to the scope of work and that will be the focus of this SEA include construction of an honor guard building and general site improvements to existing structures, roadways, and hardscapes.

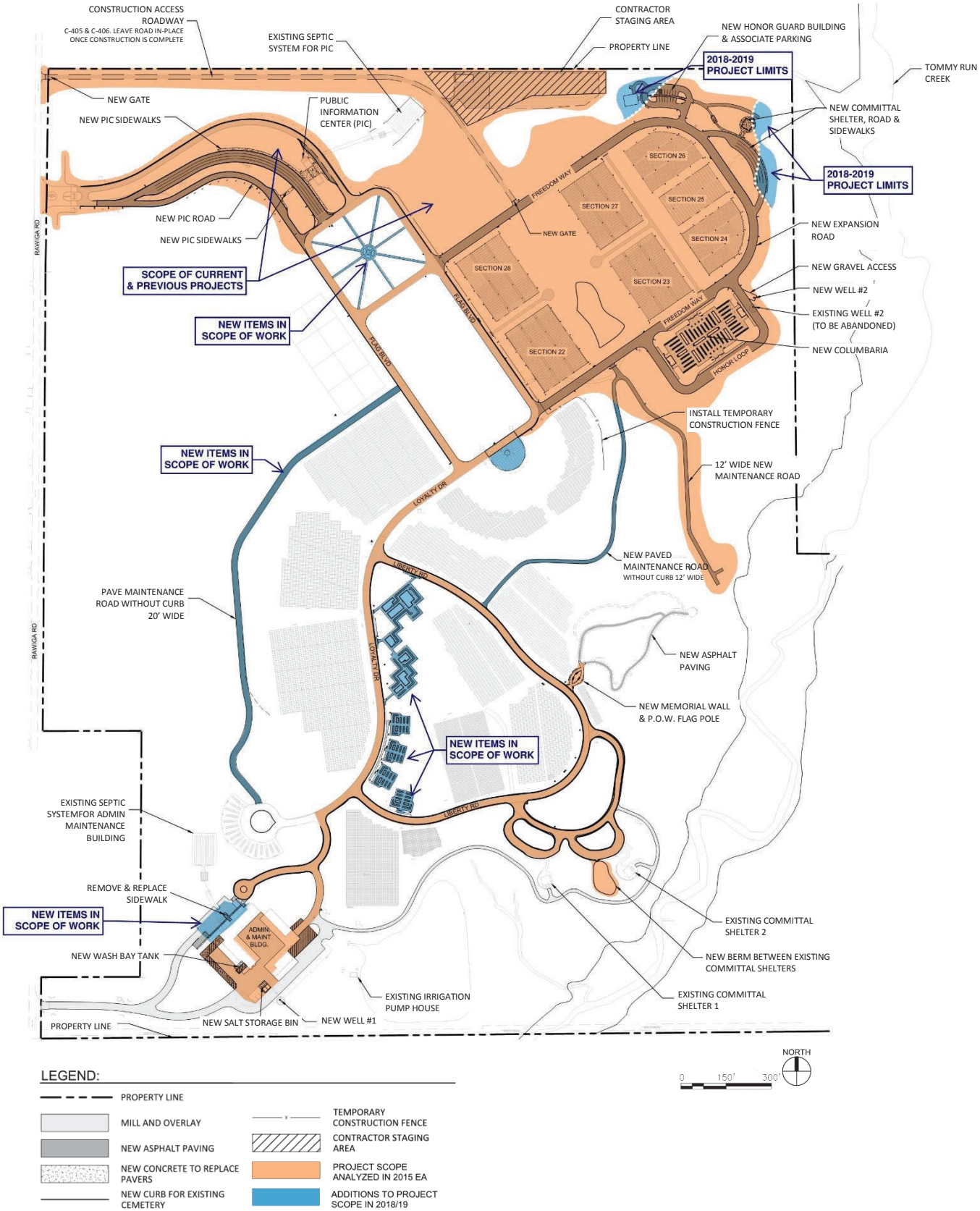
- The honor guard building provides a place for the honor guard team to prepare before and wait between ceremonies. The building would include a covered porch that would function as a gathering place for honor guard members and serve as overnight storage for carts. Utilities, including electricity, water, and sewer, would be connected to this building.

- General site improvements include updates to the existing structures (administration building, committal shelters, wash bay building, public information center and restrooms), replacing pavers with concrete in the flag assembly area, public information center, and columbarium areas, installation of curb and gutter on existing roadways, and paving an existing gravel maintenance road (without curbs).

2.2 No Action

The No Action alternative serves as a benchmark to compare the effects of the Proposed Action. For this project, the No Action alternative is to reject the proposed changes to the project scope the construction of a new honor guard building. The No Action alternative would not allow construction of a new honor guard building and leave the national cemetery without the space necessary for honor guard members to prepare for burials and services.

Figure B. Changes in Project Scope



Section 3.0 Affected Environment and Environmental Consequences

3.1 Criteria for Analysis of Impacts

This section describes the existing conditions at OWRNC and presents an analysis of the potential environmental consequences of the Proposed Action and No Action alternative. Each alternative was evaluated for its potential impacts on physical, biological, and socioeconomic resources in accordance with the CEQ regulations at 40 CFR 1508.8

The specific criteria for evaluating the potential environmental impacts of the Proposed Action and the No Action alternative are described in the following paragraphs. The significance of an action is also measured in terms of its context and intensity. The potential environmental impacts are described in terms of duration, whether they are direct or indirect, the magnitude of the impact, and whether they are adverse or beneficial, as summarized in the following paragraphs:

- **Short-term or long-term -** In general, short-term impacts are those that would occur only with respect to a particular time-lined activity, for a finite period, or only during the time required for construction or installation activities. Long-term impacts are those that are more likely to be persistent and chronic.

- **Direct or indirect -** A direct impact is caused by an action and occurs around the same time at or near the location of the action. An indirect impact is caused by an action and might occur later in time or be farther removed in distance but still be a reasonably foreseeable outcome of the action.

- **Less-than-significant (negligible, minor, moderate), or significant -**These relative terms are used to characterize the magnitude or intensity of an impact. Negligible impacts are generally those that might be perceptible but are at the lower level of detection. A minor impact is slight, but detectable. A moderate impact is readily apparent. Significant impacts are those that, in their context and due to their magnitude (severity), have the potential to meet the thresholds for significance set forth in the CEQ regulations (40 CFR 1508.27) and, thus, warrant heightened attention and examination for potential means for mitigation to fulfill the policies set forth in NEPA. Significance criteria by resource area are presented in the following sections.

- **Adverse or beneficial** - An adverse impact is one having unfavorable or undesirable outcomes on the man-made or natural environment. A beneficial impact is one having positive outcomes on the man-made or natural environment.

3.2 Cultural Resources

Cultural resources include both historic and prehistoric archaeological resources, as well as historic structures in the built environment. This impact analysis focused on sites and structures listed in, or eligible for nomination to, the National Register of Historic Places (NRHP), and the regulations (36 CFR Part 800) for implementing Section 106 of the National Historic Preservation Act of 1966.

3.2.1 Existing Environment

As detailed in the 2015 EA, the entire national cemetery property was subject to an intensive archaeological survey, coordinated with the State Historic Preservation Office (SHPO), Ohio Historic Preservation Office, prior to its initial development in 1994–1995. The survey identified 14 prehistoric sites on the property and

three historic sites, none of which were eligible for the NRHP.

The National Park Service has determined that all national cemeteries are exceptionally significant places that are eligible for listing in the NRHP. The portions of the national cemetery property that have been developed for cemetery purposes are considered contributing, while unimproved acreage is considered noncontributing (NPS 2011).

3.2.2 Effects of the Preferred Action Alternative

The proposed action would not directly affect any historic properties that are eligible for listing in the NRHP. 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.

As stated in the 2015 EA, a representative of the Ohio SHPO visited the site in December of 2014 and determined that the development of OWRNC was in keeping with the environmental setting of the surrounding area and had resulted in no adverse effect. Consultation with SHPO in 2019 regarding the updated project resulted in concurrence with the prior determination that the project would not affect historic properties. Furthermore, since the proposed expansion and improvements of the cemetery are 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.

3.2.3 Effects of the No Action Alternative

No construction or cemetery operation in expansion areas would occur under the No Action alternative. Therefore, there would be no impact to cultural resources.

3.2.4 Minimization/Management Measures

As requested by SHPO, the NCA will notify SHPO if new or additional effects or historic properties are identified.

3.3 Wildlife and Habitat

3.3.1 Existing Environment

In February 2019, the VA contacted the United States Fish and Wildlife Service (USFWS) and the Ohio Department of Natural Resources (DNR) to identify any new potential for the presence of state or federally-listed threatened or endangered species on or in the vicinity of the site. The agencies responded advising that the project is within the range of the state and federally listed endangered Indiana bat (*Myotis sodalis*) and the state listed species of concern and federally listed threatened northern long-eared bat (*Myotis septentrionalis*).

Winter habitat for the Indiana bat and northern long-eared bat includes caves and mines, neither of which are present on the cemetery property. In the spring and summer, however, the bats migrate to wooded areas to roost. Roosting trees for these bat species include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. The forested area along Tommy Run has the potential to contain trees that may act as roosting trees for the bat species.

The Ohio DNR indicated that there are no other records of state endangered or threatened plants or animals within the project area, or records of state potentially threatened plants, special interest or species of concern animals, or any federally listed species on or in the vicinity of the site. Additionally, there are not any records of unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national forests, national wildlife refuges, or other protected natural areas within the project area.

The USFWS review of the proposed project resulted in concurrence that it was not likely to adversely affect any federally listed species, based on commitment not to cut potential roosting trees for bat species during the spring and summer months.

3.3.2 Effects of the Preferred Action Alternative

The preferred Action Alternative at the site would have short- and long-term, direct, minor, adverse impacts on wildlife species and habitat due to disturbance during construction and long-term conversion of habitat to landscaped grounds. The effects to biological resources would be managed to minor levels by timing construction activities to avoid impacts to bat habitat during the roosting season and by implementation of best management practices.

3.3.3 Effects of the No Action Alternative

Under the No Action Alternative, the purpose and need would not be met. No construction by VA would occur, resulting in no effects to vegetation or wildlife habitat in the proposed project area.

3.3.4 Minimization/Management Measures

To reduce effects to biological resources during construction, the VA would time all cutting of trees greater than or equal to three inches in diameter at breast height to occur between October 1st and March 31st to avoid adverse effects to the threatened and endangered bat species. If trees suitable for bat roosting must be cut during the summer months, the VA will have net surveys conducted between June 1st and August 15th, prior to any cutting. The net surveys would incorporate nine net nights per square 0.5 kilometer of project area.

3.4 Floodplains, Wetlands, and Coastal Zone Management

3.4.1 Existing Environment

The cemetery property is primarily upland area that is bisected from north to south by Tommy Run, a perennial creek. The wooded riparian area immediately adjacent to Tommy Run is within a 100-year flood zone (1 percent annual chance flood hazard), with small pockets in the 500-year flood zone (0.2 percent annual chance flood hazard). The upland area adjacent to Tommy Run slopes steeply toward the drainage, which limits the flood zones to be within close proximity to the creek. Figure C shows the location of the flood zones within the cemetery property.

A wetland determination report for the proposed project area was commissioned and a survey was conducted in July 2014 (SmithGroup JJR 2014). As described in the 2015 EA, six wetland areas (A-F) ranging from 0.02 to 0.24 acres (totaling 0.55 acres) were identified. The United States Army Corps of Engineers (USACE) determined that these are isolated wetland and are not jurisdictional waters of the

United States (USACE 2015).

Medina County is not one of the nine counties subject to the Ohio Coastal Management Program (ODNR 2007); therefore, the resource issue of coastal zone management is not discussed further in this SEA.

3.4.2 Effects of the Preferred Action Alternative

The proposed expansion and improvements would not occur within the flood zones.

Long-term, direct, minor, adverse impacts to wetlands would occur from filling 0.16 acres of isolated wetlands. Construction for the cemetery expansion and improvements would disturb three of the six wetlands (B, C, and E) from excavating, grading, and filling that portion of the cemetery property (Figure D). USACE has made a determination that these wetlands are intrastate, isolated, non-navigable waters according to 33 CFR 328.3(a)(3) and therefore are not jurisdictional waters of the U.S. subject to Section 404 of the Clean Water Act (Robinette 2015).

Isolated wetlands are considered waters of the State of Ohio and are regulated by the OEPA, Division of Surface Water, Section 401 Wetlands and Streams Permitting Section. The individual wetlands, totaling 0.42 acres, are Category 1 (that is, they provide minimal wildlife habitat, minimal hydrological and recreation function, and are hydrologically isolated). As the potential impact to the three affected wetlands is less than 0.5 acres, a Level One Isolated Wetland Permit (complying with the Section 401 Water Quality Certification) would be required.

3.4.3 Effects of the No Action Alternative

Under the No Action Alternative, the purpose and need would not be met. No construction by VA would occur, resulting in no effects to floodplains and wetlands in the proposed project area.

3.4.4 Minimization/Management Measures

Due to the locations and small sizes, the three wetlands subject to impact would be difficult to avoid. A Level One Isolated Wetland Permit would be obtained before the wetlands would be impacted. To mitigate for the wetland impacts, the VA would plan to purchase wetland bank credits, if available, from a mitigation site within the watershed. If credits are not available, the VA would mitigate through the In-Lieu Fee Program. See Appendix B for documentation of purchased wetland mitigation credits. The proposed project would impact 0.16 acres of Category One non-forested wetlands and the mitigation ratio for less than 0.5 acres of Category One wetlands is 2:1. Therefore, the VA would plan to purchase 0.4 wetland bank credits (rounding to the nearest whole tenth of an acre).

Figure C. FEMA Flood Zones

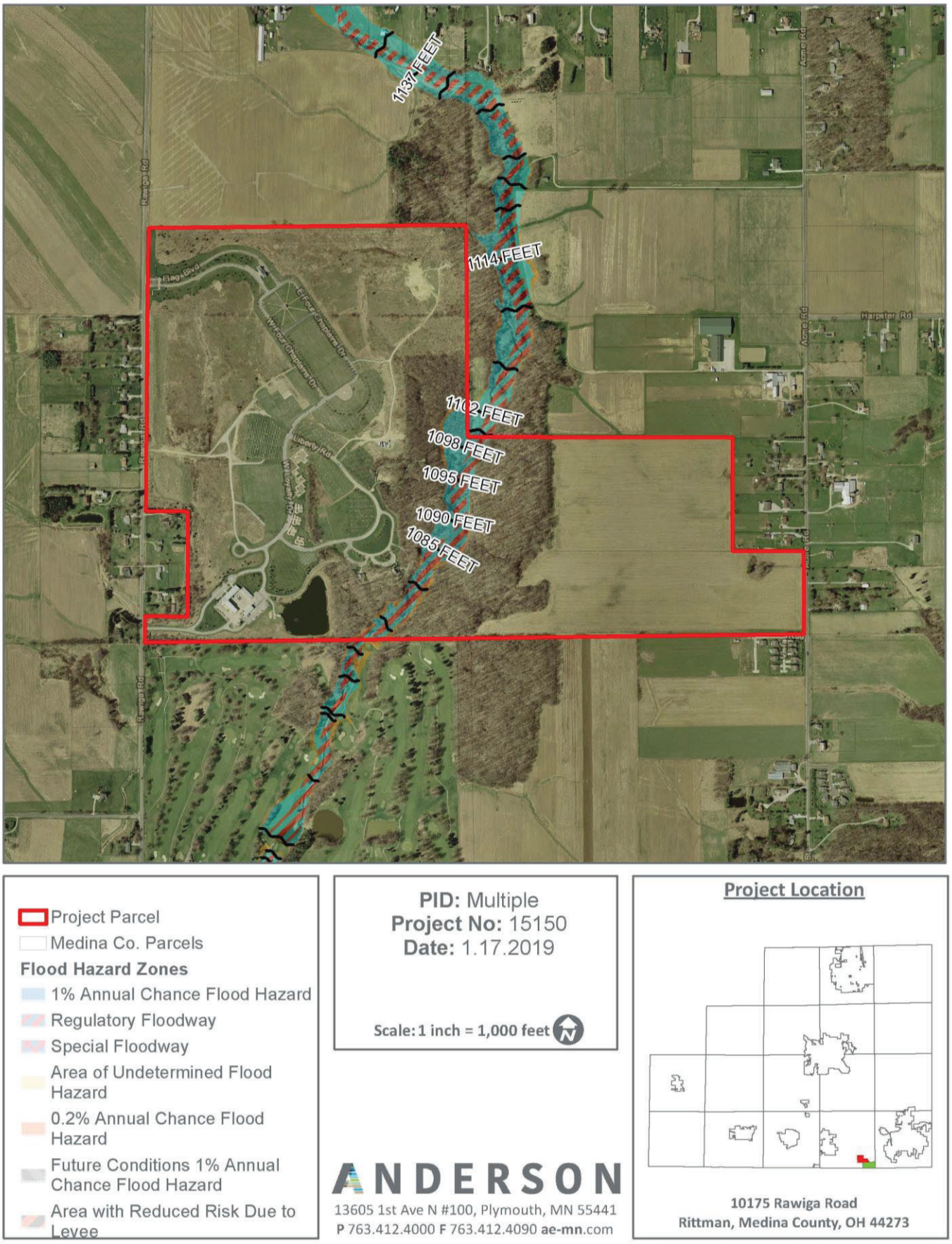
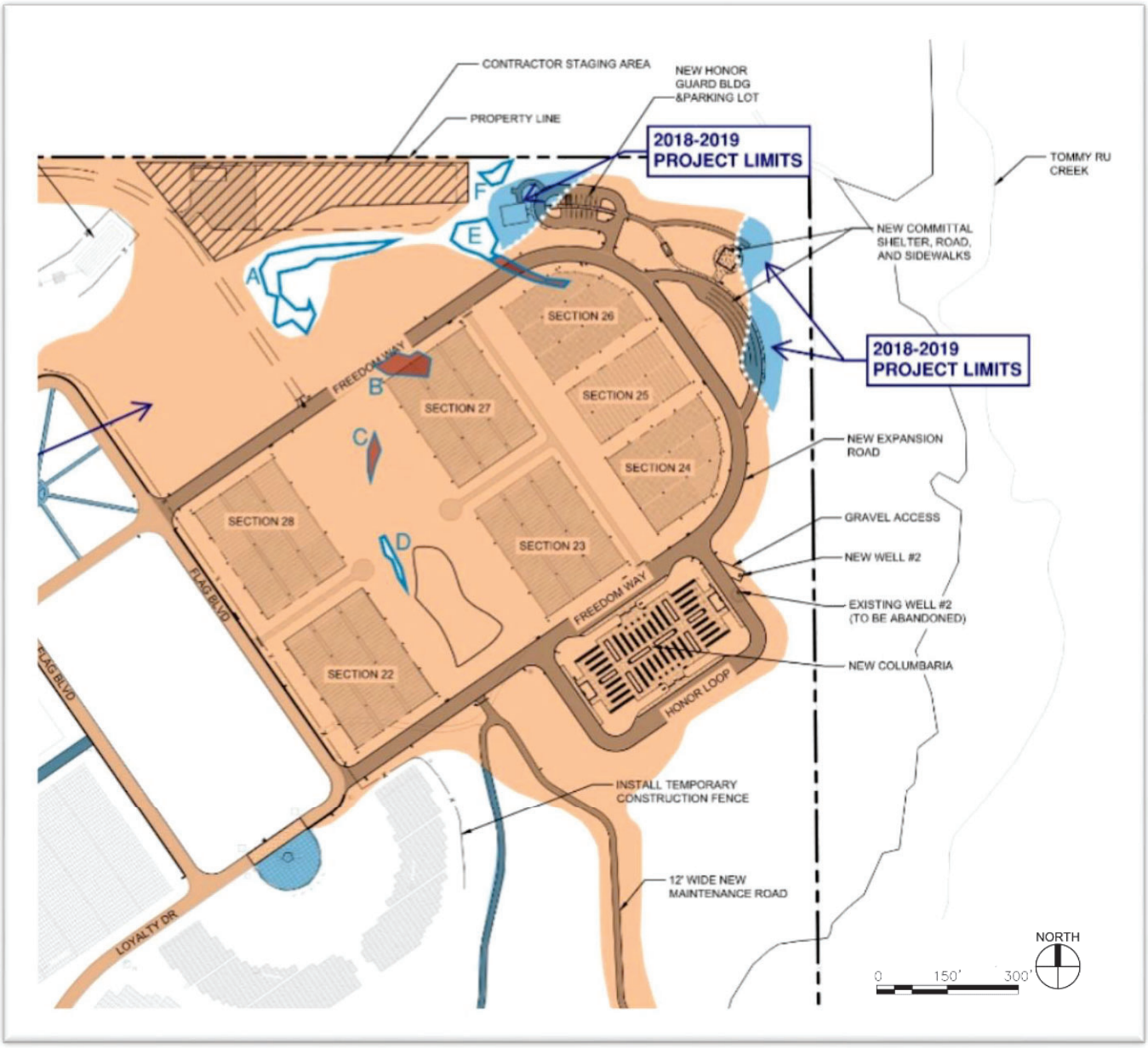


Figure D. Wetland Impact Areas



LEGEND:

- PROPERTY LINE
- MILL AND OVERLAY
- NEW ASPHALT PAVING
- NEW CONCRETE TO REPLACE PAVERS
- NEW CURB FOR EXISTING CEMETERY
- TEMPORARY CONSTRUCTION FENCE
- CONTRACTOR STAGING AREA
- PROJECT SCOPE ANALYZED IN 2015 EA
- ADDITIONS TO PROJECT SCOPE IN 2018/19
- WETLAND (A - F)
- WETLAND IMPACT AREA

3.5 Utilities

3.5.1 Existing Environment

Background information on utilities at the site are described in the 2015 EA.

VA consulted with the Ohio Environmental Protection Agency (OEPA) to determine the status of the OWRNC water system, and it was confirmed that the system is not subject to regulation by the OEPA as a public water system (Appendix A).

3.5.2 Effects of the Preferred Action Alternative

The Proposed Action includes extending utility services to the new honor guard building including electric utilities and telecommunications. The electrical system would consist of energy efficient lighting, convenience power, security system and fire alarm. The building is heated by natural gas. Cabling would be extended into the building to support information outlets with telephone and network connections. Utility usage at the new honor guard building would be unsubstantial in comparison to regional utility usage and would not have adverse impacts on utility suppliers.

The Proposed Action also includes renovations to the existing wash bay, which has not been functional. The wash bay is used to wash digging equipment and contains a water recycling system with underground tanks. The Proposed Action would involve replacing the wash bay equipment and drains and installing a new sediment catch basin within the drains. Since the Proposed Action simply involves renovations to an existing system, it is not likely to result in substantial new impacts to utilities.

3.5.3 Effects of the No Action Alternative

Under No Action, no new impacts to utilities would result.

3.6 Cumulative Impacts

As defined by CEQ Regulations in 40 CFR Part 1508.7, cumulative impacts are those which "result from the incremental impact of the Proposed Action when added to other past, present, and reasonably foreseeable future actions, without regard to the agency (Federal or non-Federal) or individual who undertakes such other actions."

Given the nature and location of the Proposed Action within the current cemetery property boundary and its nature as a simple 10-year continuation of current cemetery operations, no significant cumulative adverse effects to any resources are anticipated.

3.7 Potential for Generating Substantial Controversy

During both the 2015 EA process and the current SEA process, the VA has solicited input from various federal, state, and local government agencies regarding the proposed action. None of the agencies have expressed opposition to the proposed action. These agencies were given the opportunity to comment on the draft EA in 2015 and will be given the opportunity to comment on the draft SEA as well. Input will be incorporated into the final SEA.

During the scoping for the 2015 EA, residents living adjacent to the cemetery actively participated in a discussion about the proposed expansion and no areas of controversy were identified.

Section 4.0 Public Involvement

The VA invites public participation in decision-making on new proposals through the NEPA process. Public participation with respect to decision making on the Proposed Action is guided by 38 CFR Part 26, the VA's policy for implementing NEPA. Additional guidance is provided in the VA's NEPA Interim Guidance for Projects (VA 2010). Consideration of the views and information of all interested persons promotes open communication and enables better decision making. Agencies, organizations, and members of the public with a potential interest in the Proposed Action, such as area residents, interested organizations, and disadvantaged persons are urged to participate. A record of agency coordination associated with the SEA is provided in Appendix A.

4.1 Public Involvement

The VA, as the federal proponent of this Proposed Action, will publish and distribute a draft SEA for a 15-day public comment period, which will start with the publication of a notice of availability in the local newspaper. An electronic copy of the draft SEA will be available through the VA's website at http://www.cem.va.gov/cem/EA.asp. The VA will also notice availability of the draft SEA to interested agencies for comment concurrent with the public comment period.

4.2 Agency Coordination

Interagency and Intergovernmental Coordination for Environmental Planning is a federally mandated process for informing and coordinating with other governmental agencies regarding federal Proposed Actions. As part of the NEPA process (42 United States Code 4331 Section 102), public agencies were consulted to provide input on potential environmental effects on resources under their jurisdiction within the Proposed Action area, and provide any relevant information. The following agencies were contacted as part of this SEA: USACE, USFWS, ODNR, OEPA, and SHPO.

VA received responses from the following agencies: USFWS, ODNR, OEPA, and SHPO. Input provided by these agencies is addressed in the appropriate resource sub-sections of Section 3. Written correspondence from the agencies is provided in Appendix A. The following summarizes the agency input received and incorporated in the analysis of this SEA:

- **USFWS** reviewed the project description and concurred with the determination that the project, as proposed, is not likely to adversely affect any federally listed species. This is based on the commitment to only cut trees greater than three inches in diameter at breast height between October 1 and March 31 to avoid adverse effects to the federally listed endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*).

- **ODNR** Division of Wildlife recommends that impacts to streams, wetlands and other water resources be avoided and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation. The Division of Wildlife also recommends that if suitable habitat for threatened bat species occurs within the project area and that any necessary tree cutting should occur between October 1 and March 31. ODNR also reviewed the Natural Heritage Database, which resulted in no records [of state endangered or threatened plants or animals; state potentially threatened plants, special interest or species of concern; federally listed species; unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national forests, national

wildlife refuges, or other natural areas] at or within a one-mile radius of the project area.

- **OEPA** stated that an isolated wetland permit application is required for wetlands impacted by the project and that a General National Pollutant Discharge Elimination System (NPDES) permit would be needed for construction activity. OEPA also stated that the Medina Health Department will review and approve new on-site domestic small flow sewage systems.

- **SHPO** acknowledged that the entire project area was previously investigated and that previous coordination with their office had resulted in a determination that the cemetery expansion and improvement project would not affect historic properties. SHPO reviewed the adjusted project scope and stated that their office still agrees with their prior determination.

4.3 Native American and Section 106 NHPA Consultation

In accordance with Section 106 of the National Historic Preservation Act (NHPA), Executive Order 13175 and the Native American Graves Protection and Repatriation Act, VA sent letters during the SEA process asking for input to federally recognized tribes in the region that may attach religious or cultural significance to the property affected by the Proposed Action. Eight Native American tribes with possible ancestral ties to the Proposed Action's project area were contacted based on review of the Tribal Directory Assessment Tool from the United States Department of Housing and Urban Development. The following Native American tribes were contacted as part of this SEA: Eastern Shawnee Tribe of Oklahoma, Forest County Potawatomi Community, Hannahville Indian Community, Miami Tribe of Oklahoma, Ottawa Tribe of Oklahoma, Seneca Nation of Indians, Seneca-Cayuga Nation and Wyandotte Nation.

An example of the written correspondence to tribes is provided in Appendix A. No responses were received.

Also in accordance with Section 106 of the NHPA and 36 CFR Part 800 and as detailed in section 4.2, VA consulted with SHPO.

Section 5.0 Summary and Conclusion

This SEA analyzes the potential environmental effects of VA's Proposed Action for amending the 2015 project plan for expansion and improvements to the Ohio Western Reserve National Cemetery in Medina County, Ohio.

This SEA evaluates two alternatives:

1) Proposed Action: to expand and improve the OWRNC within the existing cemetery property to provide 10 years of interment capacity. The proposed action encompasses items evaluated in the 2015 EA as well as the additions to the project scope, which include a new honor guard building and general site improvements to existing structures, roadways, and hardscapes.
2) No Action alternative: to reject the proposed changes to the project scope including construction of a new honor guard building and general site improvements to existing structures, roadways, and hardscapes.

This SEA evaluates possible effects to resource areas that are subject to change from the those previously evaluated in the 2015 EA. The revisited resource areas in this SEA include cultural resources; wildlife and habitat; floodplains, wetlands, and coastal zone management; and utilities. To date, no significant impacts or potential for generating substantial controversy have been identified in this SEA. Comments received over the course of the public involvement period will be incorporated into the Final SEA.

Section 6.0 List of Preparers

Office of Construction and Facilities Management Fernando Fernández, Environmental Engineer
Anderson Engineering of MN, LLC 13605 1st Ave N, Suite 100 Plymouth, MN 55441 Ben Hodapp, PWS, Environmental Department Manager Katie Ring, Environmental Associate Eric Sautbine, PE, Project Manager Curt Claeys, PLA, Landscape Architecture Department Manager

Section 7.0 References

NPS 2011. *National Register Eligibility of National Cemeteries – A Clarification of Policy (9/8/2011)*. National Park Service, U.S. Department of the Interior.

ODNR 2007. *Combined Coastal Management Program and Final Environmental Impact Statement for the State of Ohio*, Prepared by Office of Ocean and Coastal Resource Management, National Oceanic and Atmospheric Administration, and Office of Coastal Management, Ohio Department of Natural Resources. April 2007.

Robinette 2015. LRH-2014-1022-SCR Jurisdictional Determination (JD) Assessed Under Isolation Evaluation (328.3(a)(3)). Electronic mail. February 3, 2015.

SmithGroup JJR 2014. *Wetland Determination Report: Ohio Western Reserve National Cemetery.* U.S. Department of Veterans Affairs, National Cemetery Administration. Ann Arbor, MI. December 3, 2014.

USACE 2015. *Approved Jurisdictional Determination: LRH-2014-1022-MUS-Unnamed Tributary Tommy Run.* Letter from Teresa D. Spagna, Acting Chief, North Branch, Huntington District, U.S. Army Corps of Engineers to Glenn Elliott, Office of Construction & Facilities Management, U.S. Department of Veterans Affairs. February 26, 2015.

VA 1992. *Final Environmental Impact Statement for a National Cemetery to Serve the Cleveland Area*. U.S. Department of Veterans Affairs, Office of Construction and Facilities Management. October 1992.

VA 2010. *VA NEPA Interim Guidance for Projects*. U.S. Department of Veterans Affairs, Office of Construction and Facilities Management. September 30, 2010.

VA 2015. *Final Environmental Assessment: Expansion and Improvements at Ohio Western Reserve National Cemetery Rittman, Ohio*. U.S. Department of Veterans Affairs, Office of Construction and Facilities Management. July 2015.

Section 8.0 List of Acronyms and Abbreviations

CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EA	environmental assessment
EIS	environmental impact statement
FONSI	finding of no significant impact
NCA	National Cemetery Administration
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
ODNR	Ohio Department of Natural Resource
OEPA	Ohio Environmental Protection Agency
OWRNC	Ohio Western Reserve National Cemetery
SEA	supplemental environmental assessment
SHPO	state historic preservation office
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
VA	United States Department of Veterans Affairs

Section 9.0 List of Environmental Permits Required

Agency	Applicable Regulations	Requirements
Ohio Environmental Protection Agency	Ohio Revised Code 6111.02 through 6111.028.	Level One Isolated Wetland Permit
Ohio Environmental Protection Agency	Federal Clean Water Act	General National Pollutant Discharge Elimination System (NPDES) Permit for construction activity with a Storm Water Pollution Prevention Plan

APPENDIX A:
AGENCY CORRESPONDENCE

UNITED STATES DEPARTMENT OF THE INTERIOR
U.S. Fish and Wildlife Service
Ecological Services Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / Fax (614) 416-8994

TAILS# 03E15000-2019-I-0510

Dear Mr. Elliott,

We have received your recent correspondence regarding the above-referenced project. You have requested concurrence with your determination of effects to federally listed species, pursuant to section 7(a)(2) of the Endangered Species Act of 1973, as amended (ESA).

The U.S. Fish and Wildlife Service (Service) has reviewed your project description and concurs with your determination that the project, as proposed, is not likely to adversely affect any federally listed species. This is based on the commitment to cut all trees ≥3 inches dbh only between October 1 and March 31 to avoid adverse effects to the federally listed endangered Indiana bat (Myotis sodalis) and threatened northern long-eared bat (Myotis septentrionalis).

This concludes consultation on this action as required by section 7(a)(2) of the ESA. Should, during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be reinitiated to assess whether the determinations are still valid.

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or ohio@fws.gov.

Sincerely,

Patrice M. Ashfield
Field Office Supervisor

Ohio Department of Natural Resources

MIKE DEWINE, GOVERNOR | MARY MERTZ, DIRECTOR

Office of Real Estate
Paul R. Baldridge, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6649
Fax: (614) 267-4764

April 18, 2019

Katie Ring
Anderson
13605 1st Avenue N., Suite 100
Plymouth, MN 55441

Re: 19-226; Ohio Western Reserve National Cemetery, Proposed Cemetery Expansion Project

Project: The proposed project involves the improvement and expansion of the Ohio Western Reserve National Cemetery.

Location: The proposed project is located in Rittman, Medina County, Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do 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.

Natural Heritage Database: The Natural Heritage Database has no records at or within a one-mile radius of the project area.

A review of the Ohio Natural Heritage Database indicates there are no other records of state endangered or threatened plants or animals within the project area. There are also no records of state potentially threatened plants, special interest or species of concern animals, or any federally listed species. In addition, we are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national forests, national wildlife refuges, or other protected natural areas within the project area. The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

Fish and Wildlife: The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to streams, wetlands and other water resources be avoided and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.

The project is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees to include: shagbark hickory (*Carya ovata*), shellbark hickory (*Carya laciniosa*), bitternut hickory (*Carya cordiformis*), black ash (*Fraxinus nigra*), green ash (*Fraxinus pennsylvanica*), white ash (*Fraxinus americana*), shingle oak (*Quercus imbricaria*), northern red oak (*Quercus rubra*), slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), eastern cottonwood (*Populus deltoides*), silver maple (*Acer saccharinum*), sassafras (*Sassafras albidum*), post oak (*Quercus stellata*), and white oak (*Quercus alba*). Indiana bat roost trees consists of trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31. If suitable trees must be cut during the summer months, the DOW recommends a net survey be conducted between June 1 and August 15, prior to any cutting. Net surveys should incorporate either nine net nights per square 0.5 kilometer of project area, or four net nights per kilometer for linear projects. If no tree removal is proposed, this project is not likely to impact this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the U.S. Fish & Wildlife Service.

Water Resources: The Division of Water Resources has the following comment.

The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administrator contact information can be found at the website below.

http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf

ODNR appreciates the opportunity to provide these comments. Please contact Sarah Tebbe, Environmental Specialist, at (614) 265-6397 or Sarah.Tebbe@dnr.state.oh.us if you have questions about these comments or need additional information.

John Kessler
Environmental Services Administrator

Ohio Environmental Protection Agency

Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

May 3, 2019

Re: Cemetery Expansion
General Correspondence
401 Wetlands
Medina County
8DU00008

Fernando Fernandez
Department of Veteran Affairs
Office of Construction & Facilities
Washington DC 20420

Subject: Ohio Western National Cemetery Expansion
Water Resource Comments

Dear Mr. Fernandez:

The Ohio Environmental Protection Agency (Ohio EPA) received your information regarding the proposed expansion of the Ohio Western National Cemetery located in Rittman, Ohio. After reviewing the information provided to our Agency including maps and associated documentation, I wanted to make you aware of the following permits to be considered for the project.

It was indicated that an isolated wetland permit application for impacts was being developed for submittal to Ohio EPA. Also, depending upon the length of stream bank protection work prescribed, a 404 or Nationwide Permit from the US Army Corp of Engineers may be required. A 404 permit would trigger the need for an individual 401 certification from Ohio EPA. The stream bank protection project should be done utilizing natural stone and prohibit the use of asphalt or concrete.

This project will disturb more than one acre of property, so a General National Pollutant Discharge Elimination System (NPDES) permit for construction activity will be needed. In conjunction with the permit, a Storm Water Pollution Prevention Plan must also be developed. Please be aware, all applications for general permits must be submitted electronically via the eBiz Center.

It appears that a new on-site sewage system is contemplated. With a recent change in delegation, the Medina County Health Department will be reviewing and approving new on-site domestic small flow sewage systems.

Located at the Administration and Maintenance Building, there was a notation of a new 'wash bay tank'. Additional information is needed to determine the source and ultimate disposal of the wash water. Depending on the circumstances, a Permit to Install may be required from Ohio EPA.

Lastly, there appears to be new drinking water wells, domestic water pumping station and associated water lines. Please be aware that Rule 3745-81-01 of the Ohio Administrative Code (OAC) defines a public water system as a facility that has at least fifteen service connections or regularly serves an average of at least twenty-five individuals daily at least 60 days out of the year. Please contact Laurel Ljubi within the Ohio EPA-DDAGW Northeast District Office at Laurel.Ljubi@epa.ohio.gov or at (330) 963-1182 to evaluate if this facility meets the definition of a public drinking water system.

Thank you for the opportunity to provide input on your planned project, if you have any additional questions, feel free to contact our office at (330)963-1200.

Sincerely,

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

RDB/cs

OHIO HISTORY CONNECTION

In reply, refer to
1993-MED-15990

July 8, 2019

Emailed by SHPO

Glenn Elliott
U.S. Department of Veteran Affairs
Office of Construction & Facilities Management
425 I Street, NW
Room 6W417a
Washington D.C., 20001
glenn.elliott@va.gov

RE: Expansion and Improvements at Ohio Western Reserve National Cemetery, City of Rittman, Medina County, Ohio

Dear Mr. Elliott:

This is in response to the correspondence, received on June 14, 2019, regarding the proposed expansion and improvements at Ohio Western Reserve National Cemetery, City of Rittman, Medina County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

It is my understanding that previous coordination regarding expansion and improvements at the Ohio Western Reserve National Cemetery with our office in 2015 was put on hold. The proposed project has been re-implemented with some modifications, including the scope was adjusted to include an honor guard building general site improvements to existing structures, roadways, and hardscapes. The entire project area was previously investigated and previous coordination with our office determined the cemetery expansion and improvement project would not affect historic properties. Our office still agrees with this determination.

No further coordination with this office is necessary, unless the project changes or unless new or additional historic properties are discovered during implementation of this project. In such a situation, this office should be contacted as per 36 CFR 800.13. Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs.

If you have any questions, please contact me at (614) 298-2022, or by e-mail at khorrocks@ohiohistory.org. Thank you for your cooperation.

Sincerely,

Krista Horrocks, Project Reviews Manager
Resource Protection and Review

RPR Serial No: 1079633

DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington DC 20420

May 2, 2019

Mr. Kenneth Meshiguad, Tribal Chairperson
Hannahville Indian Community, Michigan
N14911 Hannahville Bl Road,
Wilson, Michigan 49896-9728

RE: Tribal Consultation - Ohio Western Reserve National Cemetery, Proposed Cemetery Expansion Project

Dear Kenneth Meshiguad,

The U.S. Department of Veterans Affairs (VA) is proposing to expand and improve the existing Ohio Western Reserve National Cemetery. The cemetery is located approximately 50 miles south of Cleveland at 10175 Rawiga Road, Rittman, Medina County, Ohio.

The proposed project would develop approximately 30 acres within the boundary of the cemetery and provide for 10 years of burial operations including interment space for casket, columbarium, and inground cremation sites; and provide irrigation, landscaping, visitor amenities, signage, and operational facility improvements. This project was previously evaluated in 2015, however, the project was put on hold before implementation and construction began. In 2018, the project was picked back up and the scope was adjusted to include a bank stabilization project along a severely eroding bend of the creek, Tommy Run, a new honor guard building, and general site improvements to existing structures (administration building, committal shelters, wash bay building, public information center and restrooms), roadways (installation of curb and gutter on existing roadways and paving an existing maintenance road), and hardscapes (replacing pavers with concrete in the flag assembly area, public information center, and columbarium areas). Attachment 1 is an aerial of OWRNC and depicts the property boundaries. Attachment 2 shows the overall project areas and changes from the 2015 project scope.

As part of the VA's 2015 environmental assessment (EA), letters were sent to each federally recognized tribe identified as having current or historical ties to the location. The assessment and finding of no adverse effect to historic properties was presented and the VA invited tribal input and feedback to the cultural resource assessment. At that time, no comments were returned, the 2015 EA concluded that no significant impacts would occur, and the VA issued a finding of no significant impact. Due to the changes in the project scope, the VA is preparing a supplemental environmental assessment and is reaching out again to invite input and feedback regarding cultural resources and historic properties.

The entire national cemetery property was subject to investigation, coordinated with the State Historic Preservation Office, prior to its initial development in 1994-1995. At that time, an intensive archaeological survey covering the entire cemetery property was conducted. Based on the results of the investigation and former consultation, the VA has tentatively concluded that the project would not adversely affect any historic properties or cultural resources. A summary of the archaeological survey is attached for reference (Attachment 3).

We welcome your participation in this process and would appreciate receiving any comments in response to this letter and attachments within 30 days. If you are interested in this action, please contact Glenn Elliott, Environmental Engineer, at Glenn.Elliott@va.gov or at 202-632-5879.

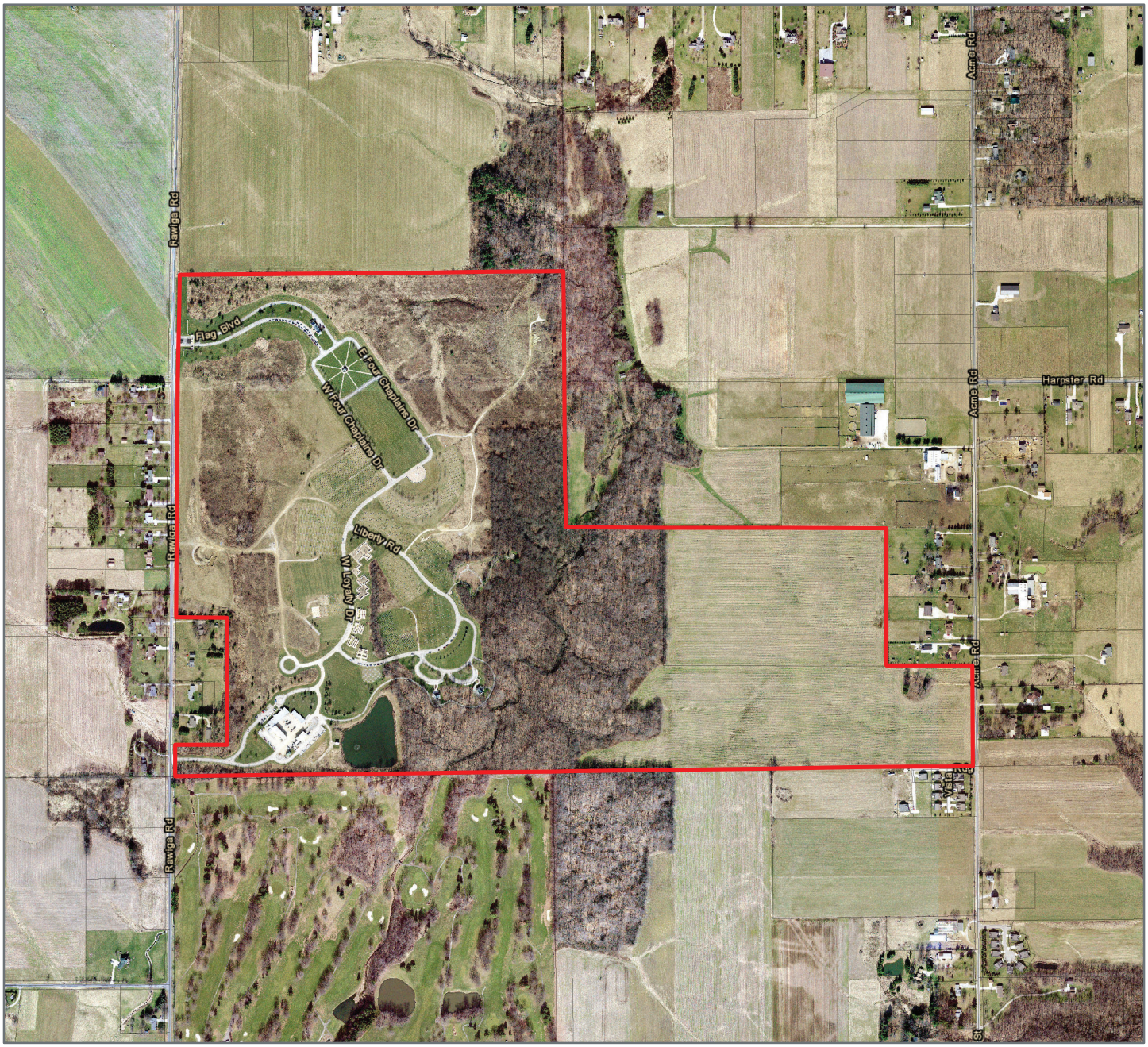
Sincerely,

Mr. William E. Hooker, III
Historical Architect
U.S. Department of Veterans Affairs

Attachments:

1. Site Aerial
2. Comparison Between 2015 and 2019 Project Scope Analyzed
3. Archaeological Resource Survey Summary

Attachment 1. Site Aerial



Legend

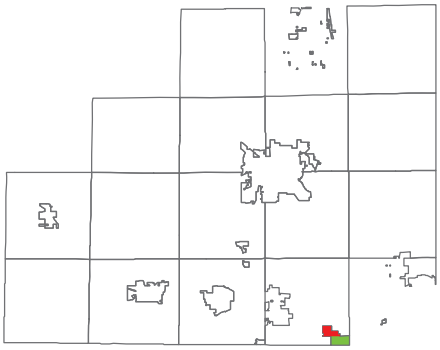
Project Parcel

Medina Co. Parcels

PID: Multiple
Project No: 15150
Date: 1.17.2019

Scale: 1 inch = 1,000 feet

Project Location

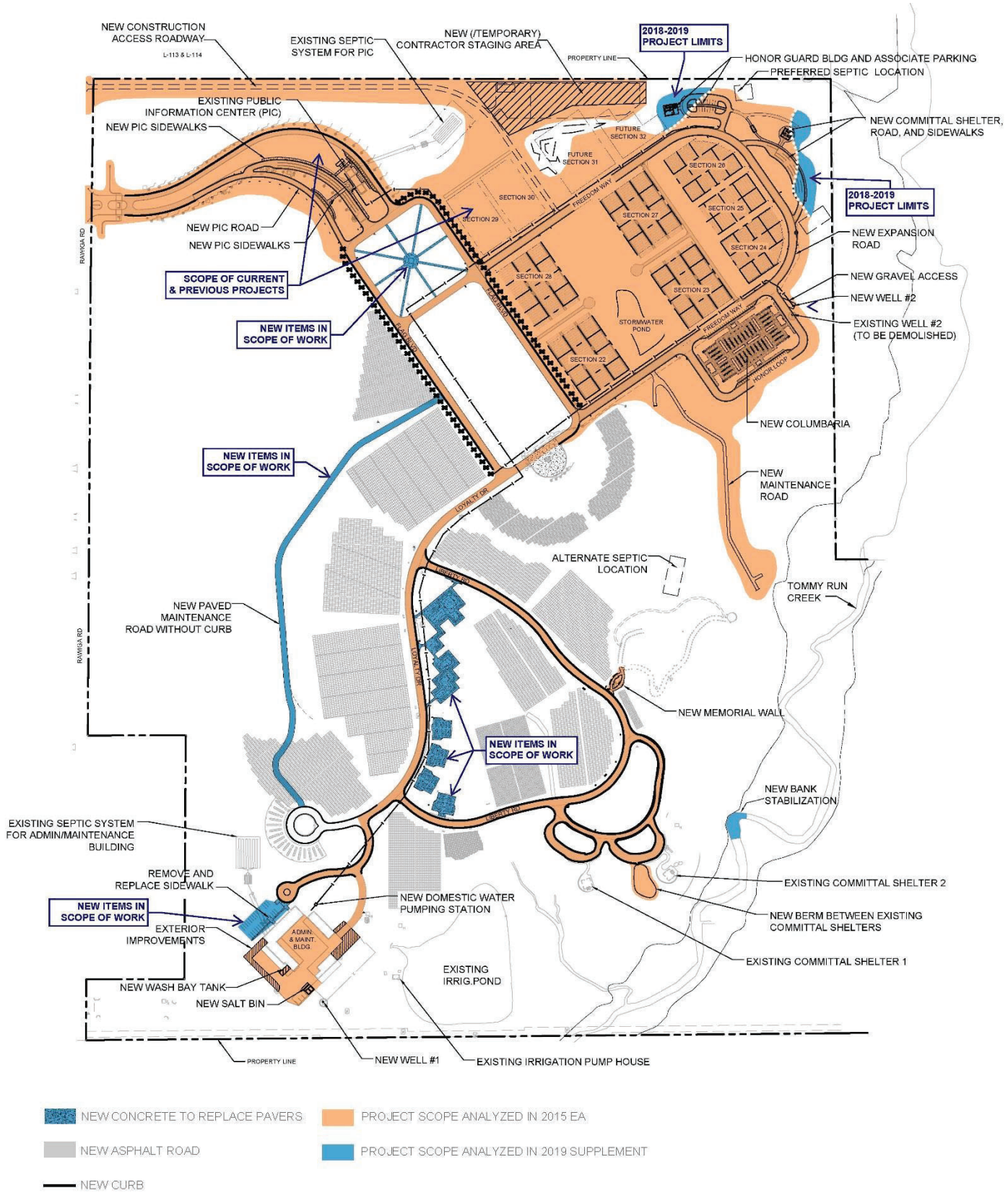


10175 Rawiga Road
Rittman, Medina County, OH 44273

ANDERSON
13605 1st Ave N #100, Plymouth, MN 55441
P 763.412.4000 **F** 763.412.4090 **ae-mn**.com

SOURCE: ODNR, USDA, ESRI, TIGER, Bing, Medina Co., Anderson Engineering

Attachment 2. Comparison Between 2015 and 2019 Project Scope Analyzed



Attachment 3.

Archaeological Resource Survey Summary

The entire national cemetery property was subject to previous investigation prior to its initial development in 1994–1995. 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. 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.

The following paragraphs summarize the findings of the 1993 archaeological survey. The locations of findings are depicted in Figure 1. Sites 33ME0294 and 33ME0293, both unknown prehistoric sites, are located in the proposed expansion area.

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.

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 screw lid-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.

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. 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. 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 2-4). 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 5-6). The barn at 3030 Seville Road is a large raised basement barn with concrete foundation, vertical board walls, and metal panel roof (Figure 7). 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. 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.

References

Otter, Edward 1993. *Cultural Resources Survey for the Proposed National Cemetery in Guilford Township, Medina County, Ohio*. Bregman and Co., Inc., Bethesda, Maryland.

Figure 1. Archaeological Survey Map

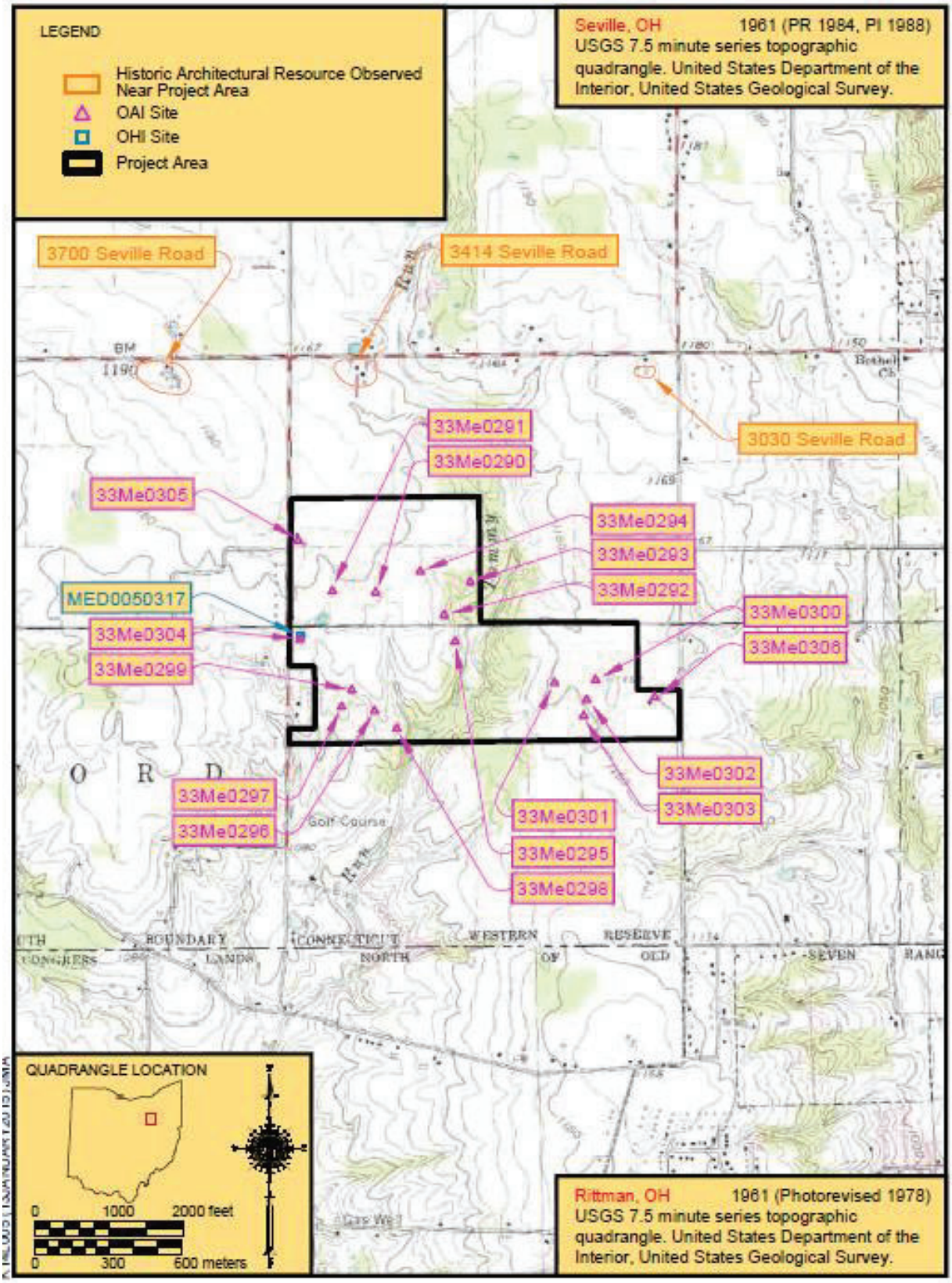


Figure 2. Primary residence associated with the farmstead at 3114 Seville Road (MED0031017), facing southeast.

Figure 3. Primary and secondary residences associated with the farmstead at 3414 Seville Road (MED0031017), facing southwest.

Figure 4. Outbuildings associated with the farmstead at 3414 Seville Road (MED0031017), facing south.

Figure 5. Overview of the farmstead at 3700 Seville Road, facing west.

Figure 6. Detail of the residence associated with the farmstead at 3700 Seville Road, facing west.

Figure 7. View of the barn at 3030 Seville Road, facing west.

APPENDIX B:
WETLAND MITIGATION CREDITS

Stream and Wetlands FOUNDATION

123 South Broad Street, Suite 238
P.O. Box 369
Lancaster, Ohio 43130
T: (740) 654-4016
F: (740) 689-0890

November 18, 2019

Mr. Mark Polen
Ohio Western Reserve National Cemetery
U.S Department of Veterans Affairs
10175 Rawiga Road
Rittman, Ohio 44273

RE: Wetlands Mitigation at its Ohio Western Reserve National Cemetery site located at 10175 Rawiga Road in the City of Rittman, Medina County, Ohio.
ACCT NO. BDH-102
Ohio EPA ID No. 196385W

Dear Mr. Polen:

The Stream + Wetlands Foundation received on November 18, 2019 a final payment of $19,800 (check #33019), for the purchase of 0.4 acres of non-forested wetland mitigation credits from the Big Darby Hellbranch Wetlands Mitigation Bank for the Ohio Western Reserve National Cemetery site.

This payment along with the previous deposit payments fulfills your financial obligations with the S+W Foundation for this project. Please keep a copy of this letter and revised agreement for your records.

Thank you very much for allowing S+W Foundation to assist you with the wetlands mitigation needs of this project. Should you need further assistance, please feel free to call anytime.

Sincerely,

Vincent E. Messerly, P.E.
President

Cc: Ben Hodapp, Anderson Engineering of MN, LLC., via email
Cory L. Wilson, Army Corps of Engineers, via email

APPENDIX C:
LEVEL ONE ISOLATED WETLAND PERMIT

Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

Re: OWRNC Expansion and Improvements
Permit - Intermediate
Approval
401 Wetlands
Medina
DSW401196385W

October 23, 2019

Fernando Fernandez
VA Ohio Western Reserve National Cemetery
Department of Veterans Affairs
Office of Construction & Facilities Management
425 I Street NW, Room 6W417b
Washington D.C. 20001

Subject: Grant Authorization under Level One General Isolated Wetlands Permit
Ohio Western Reserve National Cemetery (OWRNC) Expansion and Improvements
Ohio EPA ID No. 196385W

Dear Mr. Fernandez:

On June 28, 2019, the Ohio Environmental Protection Agency (Ohio EPA) received a Pre-Activity Notice (PAN) for coverage under the OHIO GENERAL PERMIT FOR FILLING CATEGORY 1 AND CATEGORY 2 WETLANDS (general permit). In the PAN, you requested to impact 0.16 acres of non-forested Category 1 wetlands for the purpose of expanding the existing cemetery located at 10175 Rawiga Road in Rittman, Medina County (41 deg. 00' 13.74" N / 81 deg. 48' 31.49" W). After an administrative review of the PAN, it was determined to be complete on October 9, 2019. As compensatory mitigation for the aforementioned impacts, 0.4 acres of non-forested wetland mitigation credits were reserved at the Big Darby Hellbranch Wetlands Mitigation Bank with the Stream and Wetlands Foundation.

Please. familiariz yourself with the general permit (see Jink below). It contains requirements and prohibitions with which you must comply.
http://www.epa.ohio.gov/portals/35/401/2017-2022 General IWP.pdf

Additionally, please be aware that as per ORC §6111.022(E) and Part V of the general permit, the proposed filling of the isolated wetland must be completed within two years of the date of this letter. If you do not complete the filling within this time, you must submit a new pre-activity notice to Ohio EPA.

You may find a copy of Ohio EPA's rules and laws online at http://www.epa.ohio.gov/dsw/dswrules.aspx. Information regarding Ohio's Section 401 and Isolated Wetlands Permitting programs is also available online at http://www.epa.ohio.gov/dsw/401/permitting.aspx.

If you have any questions, please contact me at (330) 963-1172 or via email at ed.wilk@epa.ohio.gov.

Sincerely,

Ed Wilk
Application Coordinator
401/Wetlands/Mitigation Section
EW/cs

ec Andrea Kilbourne, Ohio EPA, DSW, Mitigation Coordinator
Jeff Boyles, 401/Wetlands/Mitigation Section Supervisor, Ohio EPA
Cory Wilson, Department of the Army, Huntington District, Corps of Engineers Vince Messerly, Stream+ Wetlands Foundation
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