

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

U.S. DEPARTMENT OF VETERANS AFFAIRS PROPOSED CONSTRUCTION AND OPERATION OF THE PUERTO RICO NATIONAL CEMETERY REPLACEMENT MOROVIS, PUERTO RICO

Introduction

The U.S. Department of Veterans Affairs (VA), National Cemetery Administration (NCA), prepared a Final Site-Specific Environmental Assessment (SEA), included herein by reference, to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Proposed Action to construct and operate the initial phase ("Phase 1") of the Puerto Rico National Cemetery Replacement, to be located on the VA's property at PR-137, Km 11.2 in the municipality of Morovis, Puerto Rico. The VA's property is approximately 247.5 acres. However, only 124 acres are suitable for development. The remaining 123 acres will be preserved in perpetuity under a conservation easement granted to the Puerto Rico Department of Natural Resources (PRDNER). The Phase 1 cemetery would cover approximately 50 acres of the 124 acres suitable for development. The Phase 1 cemetery would provide for 10 years of burial operations including casket, columbarium, in-ground cremation sites, and committal shelters, and well as supporting infrastructure including buildings, roadways, parking, irrigation, landscaping, visitor amenities, signage, and other operational facility improvements to support potential future cemetery expansion phases elsewhere within the remaining 124-acre suitable development area. Additionally, under the Proposed Action the VA would implement PRDNER-required off-site compensation commitments to account for potential development of the entire 124-acre suitable development area. However, the VA will evaluate the need for future cemetery expansion phases every 10 years, and each phase would be preceded by separate NEPA analyses prior to a decision to implement an expansion.

The SEA was prepared in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 et seq.), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and VA's NEPA implementing regulations, 38 CFR Part 26 (*Environmental Effects of the Department of Veterans Affairs Actions*). The SEA also tiers to and incorporates by reference, the findings of the August 2011 *Final Programmatic Environmental Assessment (PEA)* and the Finding of No Significant Impact (FONSI) that the VA completed as part of the selection process for a suitable site for the Puerto Rico National Cemetery Replacement.

The **purpose** of the Proposed Action is to enable the NCA to continue to provide eligible Veterans and their families with a National Cemetery of sufficient size and capacity to continue to serve the projected burial needs of Veterans in Puerto Rico for at least 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 burial options. The current Puerto Rico National Cemetery in the municipality of Bayamon is the only National Cemetery outside of the United States mainland. It has provided burial spaces for the past 65 years but is anticipated to reach full in-ground interment capacity by approximately 2022 and full columbarium capacity by 2030. Additionally, the Puerto Rico National Cemetery in Bayamon does not have any additional areas where potential future expansions could occur. The Puerto Rico National Cemetery Replacement is also needed for VA to comply with the *Service Members Civil Relief Act*.

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.

On August 22, 2011, NCA issued the *Final Programmatic Environmental Assessment (PEA) of the Proposed Construction and Operation of the Morovis, Puerto Rico National Cemetery, Morovis, Puerto Rico (VA, 2011)*, which documented the NEPA analysis of the potential impacts associated with selecting and acquiring the 247.5-acre parcel where the Puerto Rico National Cemetery Replacement could be located. Based on the PEA findings, the VA issued a FONSI, which stated that no significant adverse impacts were anticipated with acquiring the parcel and developing it as a National Cemetery, as long as management and avoidance measures were incorporated into the subsequent site-specific construction design and operational practices. The FONSI also documented VA's commitment to complete a Site-Specific Environmental Analysis (SEA) of the eventual Proposed Action for the Puerto Rico National Cemetery Replacement. Based on the PEA and FONSI, the VA purchased the 247.5-acre parcel for \$7.6 million in March 2013.

The VA subsequently began the site-specific design process and conducted several site-specific investigations for wetlands, regulated flora and fauna, geological features, and cultural resources, and initiated or continued consultations with federal, Commonwealth, and local regulatory agencies and utility providers. Through this process, the VA determined that approximately 124 acres within the 247.5-acre parcel were suitable for development, while the remaining approximately 123 acres would need to be preserved in perpetuity. To account for this constraint, the VA's final master plan located the 50-acre Phase 1 cemetery and potential future conceptual cemetery expansion phases within only the 124-acre suitable development area.

Description of Proposed Action and Alternatives

Proposed Action

Under the Proposed Action, Phase 1 of the Puerto Rico National Cemetery Replacement would be constructed and operated on an approximately 50-acre area at the site. The Phase 1 cemetery would provide for 10 years of burial capacity including casket, columbarium, and in-ground cremation sites. The Phase 1 cemetery would also include committal shelters, supporting infrastructure, parking, irrigation, landscaping, visitor amenities, signage, and align the main entrance along Puerto Rico State Road PR-137. The Phase 1 cemetery would be constructed over a period of approximately 30 months (fall of 2017 through summer of 2020). The Phase 1 development includes the physical infrastructure needed to support potential future cemetery development. Under the Proposed Action, a 123-acre conservation easement (prohibiting development) at the site would be granted to PRDNER. Additionally, the Proposed Action incorporates off-site compensation commitments to account for potential future development on the suitable 124-acre area, as required by Puerto Rico Department of Natural and Environmental Resources (PRDNER) under the Karst Special Planning Area Regulation of 2014 (PRAPEC) Special Determination Authorization issued to the VA on June 1, 2016.

The VA will evaluate the need for future development approximately every 10 years; separate NEPA analyses will be prepared for and in advance of any such development.

No Action

No Action alternative represents the status quo and serves as the benchmark against which the effects of the Proposed Action are evaluated. For this project, No Action is defined as not developing Phase 1 of the Puerto Rico National Cemetery Replacement at this site. The No Action alternative would challenge NCA's goal of providing eligible Veterans and their families with reasonable access to VA burial options in Puerto Rico, and therefore would not meet the purpose of and need for action. The current Puerto Rico National Cemetery in Bayamon, Puerto Rico is anticipated to reach full in-ground interment capacity by 2022 and columbarium capacity by 2030. Under the No Action alternative, once the National Cemetery at Bayamon reaches capacity, Veterans and their families in Puerto Rico would be underserved by a National Cemetery in Puerto Rico; in many cases, this would require Veterans and their families to travel to the U.S. mainland to obtain burial services at another National Cemetery or at a private cemetery. The distribution of National Cemeteries in the region would be unequal, and VA would not comply with the *Service Members Civil Relief Act*. Furthermore, the No Action alternative would create a hardship for the survivors attending the funerals and for grave visitations of deceased Veterans interred in a National Cemetery located on the U.S. mainland, because of the need for extensive travel between Puerto Rico and the burial sites.

Environmental Analysis

As documented in the Final SEA, NCA concludes that the Proposed Action would not cause a significantly adverse impact, individually or cumulatively, on any of the environmental resources analyzed, including: aesthetics; air quality; geology, topography, and soils; hydrology and water quality; wildlife and habitat; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomics; community services; solid and hazardous materials; transportation and parking; utilities; or environmental justice. For cultural resources, the VA assumes potential adverse effects under Section 106; the VA will continue consulting with the Puerto Rico State Historic Preservation Office to manage these impacts at less-than-significant levels. Furthermore, the VA will implement the management, avoidance, and regulatory compliance measures to maintain or further minimize impacts to all resources at less-than-significant levels, as described in the Final SEA and summarized in Appendix A of this FONSI.

The Proposed Action would have less-than-significant beneficial impacts on aesthetics (long-term via creation of a National Shrine), socioeconomics (potential short-term via increased local employment and spending on construction supplies), and significantly beneficial impacts on community services (long-term via creation of burial opportunities for Veterans and their families in Puerto Rico). No potential for generating substantial public controversy was identified or is anticipated from implementing the Proposed Action.

Under the No Action alternative, a significantly adverse impact on community services would result, as a Puerto Rico National Cemetery Replacement would not be available when the current Puerto Rico National Cemetery in Bayamon reaches capacity. Additionally, the No Action Alternative generate substantial controversy, as the public anticipates the Puerto Rico National Cemetery Replacement in Morovis will be operational within the next 1-3 years.

Agency and Public Involvement

The agency and public involvement process was designed to provide these groups with multiple opportunities to learn about and provide comments on the Proposed Action throughout the NEPA SEA process. As described in the Final SEA, the VA solicited early input from regulatory agency stakeholders; their concerns and comments were addressed and incorporated in the Draft SEA. Additionally, prior to publication of the Draft SEA, the VA announced and held an open meeting in Morovis, Puerto Rico on

July 26, 2016, where details about the Proposed Action were presented to the general public and regulatory stakeholders. Comments received during the meeting were in favor of constructing and operating the Puerto Rico National Cemetery Replacement at the Morovis site.

Following additional analyses of the Proposed Action, the VA completed the Draft SEA (in English and Spanish) and published it for public review and comment during a 30-day period beginning on March 24, 2017. Prior to the 30-day review period, the VA published a Notice of Availability (NOA) for the Draft SEA in *El Nuevo Día* and *Primera Hora* in English on March 17 and 18, 2017, and in Spanish on March 23 and 24, 2017. The NOA stated that the Draft SEA was available for review at the Morovis Town Hall and the National Cemetery in Bayamon, and could be downloaded electronically from the VA website (<http://www.cem.va.gov/ce/EA.asp>). In addition, the VA mailed letters on March 20, 2017 to regulatory agency stakeholders to solicit comments on the Draft SEA during the 30-day review period.

During the 30-day review period, VA received only one comment on the Draft SEA, from the U.S. Fish and Wildlife Service (USFWS). In a letter dated May 10, 2017, the USFWS agreed with the Draft SEA findings and avoidance measures described for the Proposed Action, and recommended that the VA initiate Section 7 consultation to obtain their concurrence with the "may affect, but not likely to adversely affect" determination for the Puerto Rican Boa. This communication is documented in the Final SEA. Additionally, throughout the NEPA process the VA continued consultation with the PR SHPO. Although the original analysis presented in the Draft SEA, which stated that the the Proposed Action would have "No Adverse Effects to Historic Properties" per 36 CFR800.5(a)(1) (i.e., Section 106 of the NHPA) regarding historic properties at the site, through the consultation process the VA now assumes potential adverse effects under Section 106 from implementing the Proposed Action. This new conclusion is reflected in the Final SEA. Additionally, the VA will continue consultation with the PR SHPO following completion of the NEPA process and throughout the Proposed Action development activity. No other substantive changes in the Draft SEA were required to prepare the Final SEA.

Finding of No Significant Impact

As a result of the analysis of impacts in the SEA, summarized and incorporated by reference herein, it is the conclusion of VA that, with the implementation of appropriate management, avoidance, and regulatory compliance measures included herein as Appendix A, the Proposed Action would not generate significant public controversy and would cause no significant impact of an adverse nature on the quality of the natural or human environment within the meaning of Section 102(2)(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.

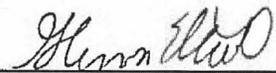
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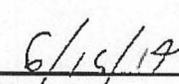
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Reason: I attest to the accuracy and integrity of this document.
Date: 2017.06.16 16:48:52 -0400

Executive Director, Southeast District
National Cemetery Administration

16 June 2017

Date


Glenn Elliott
Environmental Engineer
Construction Facility Management Office


Date

APPENDIX A

Best Management Practices/Environmental Avoidance and Protection Measures/Regulatory Compliance Measures Incorporated into the Proposed Action for the Proposed Construction and Operation of the Puerto Rico National Cemetery Replacement, Morovis, Puerto Rico

AESTHETICS

Construction. Short-term, less-than-significant adverse impacts will be minimized through implementation of the following:

- Control fugitive dust emissions through routine construction BMPs, including covering haul trucks, minimizing construction vehicle speeds entering and leaving the site, and within the site.
- Turn off construction vehicles when not in use or idling more than three minutes.
- Limit tree clearing and revegetate cleared areas with native, non-invasive species.
- Maintain vegetated buffer zone of at least 20 feet between the National Cemetery and residential abutters.
- Design buildings according to regional architectural styles.

Operation. No adverse impacts anticipated. However, the VA will implement the following to ensure beneficial, though less-than-significant, impacts are maintained:

- Professionally maintain landscaped areas.
- Limit nighttime lighting to the flagpole, entrance, and security lights around buildings.
- Professionally maintain the infrastructure, entrance, and grounds, and schedule selected maintenance activities (mowing, etc.) to avoid disrupting interment services.
- Maintain the 20-foot vegetation buffer between the National Cemetery and residential abutters.

AIR QUALITY

Construction. Short-term, less-than-significant air quality impacts will be minimized through implementation of the following:

- Use appropriate dust control methods during construction activities. Dust control methods include water sprays, chemical soil additives, and wheel washers.
- Reduce vehicle speeds to 15 miles per hour or less, to reduce dust generated by vehicles and equipment on unpaved surfaces within the site, and follow posted speed limits on paved surfaces off-site.
- Limit engine idling to no more than three minutes.
- Maintain construction vehicles in good working order.
- Quickly re-vegetate exposed soils following completion of construction activities in designated areas.

Operation. Negligible adverse air quality impacts could be further minimized through implementation of the following:

- Maintain emergency standby generator in good working condition.
- Maintain operational maintenance vehicles in good working condition.

CULTURAL RESOURCES

Construction and Operation. The VA assumes potential adverse effects under Section 106 would occur. To ensure these effects do not increase, the VA will implement the following avoidance, minimization, and management measures:

- Continue consultation with the PR SHPO.
- Establish the 123-acre preservation area, which encompasses the Quebrada Fránquez 1, Quebrada Fránquez 2, and the Cueva de la Moca, and will be proffered to the PRDNER, and will remain in place in perpetuity.
- Establish a 50-meter buffer zone around Quebrada Fránquez 1 (MR100012), Quebrada Fránquez 2 (MR100013), and the Cueva de la Moca (MR0100010).
- The Memorial Walk will encircle the Las Cruces de Catalina site (VA, 2016b). While the actual location of the artifact may not be visible along the walk, the Proposed Action may include interpretive signage to present the significance of the region, and the environmental and historical elements found within.
- Should human remains or other cultural items as defined by NAGPRA be discovered during project construction, the construction contractor would immediately cease work until the VA, a qualified archaeologist, and the PRSHPO are contacted to properly identify and appropriately treat discovered items in accordance with applicable Commonwealth and Federal law(s).

GEOLOGY, SOILS, AND TOPOGRAPHY

Construction. Long-term, less-than-significant adverse impacts to geology, and moderate but less-than-significant adverse impacts to soil and topography will be minimized through implementation of the following:

- Based on VA's survey of the site and identification of areas suitable for development and for preservation, the construction contractor will stake these areas prior to construction to ensure construction equipment/development of the Proposed Action remains within the Phase 1 cemetery 50-acre development area and does not encroach into the on-site 123-acre preservation area.
- As required by PRDNER in the June 1, 2016, PRAPEC authorization letter, implement off-site compensation commitments to account for impacts to regulated features based on the Proposed Action for the 50-acre Phase 1 cemetery, *as well as* potential impacts during potential future development phases elsewhere within the 124-acre suitable development area.
- Zanjones: As required by PRDNER in the June 1, 2016, PRAPEC authorization letter, implement off-site compensation commitments to account for the approximately 11.58 acres of zanjones that will be impacted during development of the 50-acre Phase 1 cemetery, as well as approximately 5.42 acres of zanjones (outside of the 50-acre Phase 1 development area) that could be impacted during potential future development phases elsewhere within the 124-acre suitable development area. Avoid and establish a 10-meter buffer zone around the approximately 24-acres of zanjones features that will not be impacted during any development phase at the site.
- Sinkholes and karstic depressions: avoid and maintain a 10-meter buffer zone around the sinkhole features, which are located in the 123-acre preservation area on-site and which will not be impacted by the Proposed Action to develop the Phase 1 cemetery. For impacts to karstic depressions, implement the PRDNER-required off-site compensation commitments.

- Caves: establish and maintain a 50-meter buffer zone around Cueva de la Moca, which is located within the 123-acre preservation area on site. Install fencing and signs around the perimeter of the cave to protect it from being damaged and/or vandalized.
- Grade using a terracing strategy, thus reducing the existing slope of the terrain from approximately 12% to generally 5%. Comply with Section 10.6 (Grading Guidelines) from the NCA Design Guidelines (March, 2010, or newer), which recommends a maximum slope of 15% for mowed slopes.
- Prepare, submit, and obtain EPA-NPDES Construction Stormwater Permit, including a Sediment and Erosion Control Plan (CES) and Stormwater Pollution Prevention Plan (SWPPP). Follow permit requirements, such as design, installation, and maintenance of erosion and sediment controls during the duration of construction activities and any subsequent soil disturbance activities near site drainages. Such controls may include silt fences and water breaks, detention basins, filter fences, sediment berms, interceptor ditches, straw bales, rip-rap, and/or other sediment control structures; re-spread stockpiled topsoil; and seed/re-vegetate areas temporarily cleared of vegetation.
- Minimize the amount of exposed soils at any given time during construction activities. Quickly re-vegetate disturbed areas following completion of activities.
- Provide an undisturbed natural buffer between the activity area and surface drainages, and direct stormwater run-off to vegetated areas.
- Implement spill and leak prevention and response procedures for construction equipment.
- If requested by NRCS, submit an NRCS Farmland Conversion Impact Rating Form.

Operation. Long-term, negligible adverse impacts will be minimized through implementation of the following:

- Maintain stormwater management system and landscaping with healthy vegetative cover to prevent exposing soils and subsequent soil erosion.
- Stage and cover excess soils near the Maintenance Building (or other designated area within the Phase 1 cemetery).
- Comply with Section 10.6 (Grading Guidelines) from the NCA Facilities Design Guide (March, 2010, or newer), which requires that interment areas be located on slopes of 15% or less.

HYDROLOGY AND WATER QUALITY

Construction and Operation. Short-term (construction) and long-term (operation), negligible adverse impacts on hydrology and water quality will be minimized and/or avoided through implementation of the measures specified for Geology, Soils, and Topography; for Wetlands; as well as the following:

- Entirely avoid and do not impact to federally jurisdictional wetlands and/or waterbodies.
- Establish and maintain a 15-meter buffer zone from the top of the bank from Fránquez Creek and the unnamed creek, where development will be prohibited. This buffer zone is also needed to comply with the 5-meter buffer zone required by PRDNER under Laws 1366 and 49.
- Design and construct a bridge over Fránquez creek with an open bottom geometry avoiding environmental impact (fill) to the waterway (floodway). The bridge will have the hydraulic capacity to accommodate a regional 100-year storm and the abutments would be located outside the 100-year floodplain and the 15-meter buffer zone.
- Comply to the maximum extent technically feasible with the "Energy Independence and Security Act" approved by Congress in 2009 (EISA Section 438), to maintain or retain pre-development hydrologic conditions following development.

- Limit creation of new impervious surfaces to approximately 37 acres or less.
- Utilize native vegetation and drought-resistant vegetation for area landscaping to reduce irrigation requirements.
- Route stormwater runoff from impervious surfaces to the stormwater retention pond and other natural drainage areas.
- Implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the construction area, to reduce the impacts of incidental releases of vehicle fluids.
- Limit use of pesticides and maintenance chemicals, following label requirements and keeping usage to the lowest quantities possible, thereby reducing the potential for water quality impacts.
- Construction and maintain crypts and other interments to avoid contact with groundwater.
- Utilize rainwater harvesting as the primary irrigation water source, with on-site groundwater extraction wells for a backup water source. Do not use the public potable water utility for irrigation water.

WILDLIFE AND HABITAT

Construction and Operation. Long-term, less-than-significant adverse impacts during construction, and negligible during operation, to wildlife and habitat will be minimized through implementing the following:

- The Proposed Action may affect, but is not likely to adversely affect the Puerto Rican Boa (*Epicrates inornatus*). To limit impacts, the VA will implement the USFWS/DNER Protection Protocol for the Puerto Rican Boa, which involves search, capture and relocation of boas from active construction areas and areas that will be disturbed by construction in the near future by the field biologist permanently assigned to the project during the initial construction (land clearing and grubbing) phase. Following initial clearing, the field biologist would only be on-call and would mobilize to the site in the event that a Puerto Rican Boa is encountered and required removal
- Establish and maintain the 123-acre preservation area on-site.
- Limit Phase 1 cemetery development to the 50-acre area within the 124-acre suitable development area.
- Implement the off-site compensation commitments specified by PRDNER as required under PRAPEC (see June 1, 2016 letter).
- Flag and place a fence along or around any sensitive areas encompassed by the 50-acre Phase 1 cemetery development area to protect the habitat of the species and to delineate the construction limit. Also, signs will be posted to preclude construction activities from taking place in these sensitive areas encompassed by the Phase 1 cemetery development.
- A Field Biologist designated by VA will be onsite during earthwork activities. The Field Biologist will ensure that protection methods are implemented to ensure that construction does not take place outside of the 50-acre Phase 1 development area or within the designated 123-acre preservation area on-site. During Phase 1 cemetery construction, protection measures will be implemented throughout the duration of the earthwork activities. Moreover, environmental monitoring plans will be implemented for the flora and fauna which will be prepared and performed by qualified and experienced professionals.
- Any required clearing and grubbing will be performed in such a manner as to minimize damage to existing flora and fauna adjacent to the Proposed Action boundary. As necessary, the

construction contractor will be instructed to avoid construction work in the designated preservation areas. All monuments and markers will be protected in the same manner before beginning operations around them.

- Implement the reforestation plan, which includes planting approximately 3,000 native, non-invasive trees at the site. Any trees located outside of Proposed Action construction area that are scarred or damaged will be restored to its original condition or properly removed and relocated.
- Additional construction protection measures and BMPs will be maintained within the work zones for the duration of construction activities within the specific work areas, as specified in Section 3.6.2.1.

NOISE

Construction. Short-term, less-than-significant impacts to sensitive receptors from noise will be minimized through implementation of the following:

- Schedule construction activities for daylight hours, to minimize impacts to ongoing cemetery operations (associated with Early turn-over memorial services) and nearby residential abutters.
- Maintain mufflers and sound shielding on construction equipment and routine maintenance equipment.
- Minimize equipment idling, and shut down construction equipment when not in use.

Operation. Long-term, less-than-significant impacts to sensitive receptors from noise will be minimized through implementation of the following:

- Limit rifle salutes during committal and memorial services to daytime hours.
- Operate maintenance equipment during daylight working hours and away from active committal and memorial services, thereby maintaining the dignity and solemnity of the National Cemetery environment during these services.

LAND USE

Construction and Operation. Long-term, negligible adverse impacts on land use will be minimized through implementation of the following:

- Develop the Phase 1 cemetery according to the final master plan and construction design documents.
- Utilize the site as a National Cemetery, consistent with NCA operational guidance.
- Reserved the property for public use only for Veterans' funeral services, visitation, and occasional ceremonies. No recreational use will be permitted.
- Establish and maintain a buffer zone with a minimum of six meters (20 feet) between property boundaries or fence lines and residential abutters.
- Establish and preserve other buffer zones and the 123-acre preservation area on-site as identified in the final master plan, and off-site compensation commitments per the PRAPEC Special Determination Authorization issued by PRDNER on June 1, 2016.
- Reserve the remainder of the 124-acre area suitable for development (inclusive of the 50-acre Phase 1 cemetery development) for potential future burial expansion phases of the National Cemetery; complete separate NEPA studies prior to any potential future development phase.

WETLANDS

Construction and Operation. Adverse impacts to wetlands will be avoided through implementation of the measures described for Soils; Hydrology and Water Quality; as well as the following:

- The Proposed Action entirely avoids and will not impact the federally jurisdictional 0.05-acre wetland area that occurs near the northwest boundary of the site. The wetland is located within the 123-acre preservation area and would be entirely avoided during development of the Phase 1 National Cemetery.
- Establish and maintain a 15-meter buffer zone from the top of the bank of the Fránquez Creek and the unnamed creek, where development will be prohibited.
- Where possible, establish new site drainages potentially capable of developing new wetland areas.
- Design and construct the proposed bridge over Fránquez Creek with footings located outside of the buffer zone and outside of the regional 100-year storm boundary.

SOLID WASTE AND HAZARDOUS MATERIALS

Construction. Short-term, less-than-significant adverse impacts to the environment from solid waste and hazardous material handling will be minimized through implementation of the following:

- Prior to demolition, remove regulated building materials (ACM, LBP) from the existing structures at the site. Dispose of regulated building materials according to applicable federal and Commonwealth regulations.
- Re-use excess soils on-site to the maximum extent possible.
- Stage and operate construction equipment in designated areas and away from sensitive receptors when not in use.
- Perform construction vehicle maintenance and inspections to reduce the potential for incidental releases of vehicle fluids.
- Maintain spill kits to rapidly respond to and limit impacts from accidental releases of vehicle fluids. Report releases of regulated quantities of regulated fluids (gasoline, diesel, etc.) to the VA and PRDNER. Perform cleanup according to applicable regulatory requirements.
- Recycle excess construction debris, such as wood and metal scraps, to the maximum extent practicable.

Operation. Long-term, less-than-significant adverse impacts to the environment from solid waste and hazardous material handling will be minimized through implementation of the following:

- Perform proper vehicle maintenance and routine inspections to reduce the potential for incidental releases of vehicle fluids.
- Manage solid wastes in designated areas, and establish routine pickup and disposal to appropriate landfill or recycling facilities by qualified vendors.

TRANSPORTATION AND PARKING

Construction. Short-term, less-than-significant adverse impacts on transportation (traffic only) will be minimized through implementation of the following:

- Construct entrance/exit roadway alignments according to PRHTA- and FHWA-approved designs.
- Coordinate with PRHTA regarding any necessary signage needed near the construction entrance to alert vehicles of entering and exiting construction traffic. As warranted, utilize law enforcement for traffic control during construction periods.
- Schedule construction activities such that traffic increases do not coincide with typical morning and evening periods when there may be increased local traffic levels.
- Route transportation of construction equipment (namely haul trucks bringing fill soils to the site) to minimize impacts on neighboring communities.

Operation. Long-term, negligible adverse impacts on transportation (traffic only) will be minimized through implementation of the following:

- Install signage near the cemetery main entrance to alert travelers of vehicles entering and exiting the site.
- Continue coordination with the PRHTA to identify traffic improvements that reduce the potential for accidents involving visitors' vehicles.

UTILITIES

Construction and Operation. Short-term, less-than-significant adverse impacts on utilities will be minimized through implementation of the following:

- In advance of rerouting and extending private utilities to the site, continue to communicate with private utility providers to ensure no or minimal disruptions occur to existing customers during the construction period. Utility providers include PRASA (potable water, sewer), PREPA (electricity), and CLARO and JRTPR (telecommunications).
- Inform nearby residential areas in advance of any planned utility service outages.
- Where feasible, obtain irrigation water from the on-site stormwater retention pond and groundwater wells, and do not use the potable water utility (PRASA) for irrigation water.