DRAFT

ENVIRONMENTAL ASSESSMENT

FOR THE PROPOSED

LAND ACQUISITION FOR FUTURE OHIO WESTERN RESERVE NATIONAL CEMETERY EXPANSION

10175 RAWIGA ROAD
RITTMAN, OHIO

U.S. DEPARTMENT OF VETERANS AFFAIRS

OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT
810 VERMONT AVE, NW
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EXECUTIVE SUMMARY

This Environmental Assessment (EA) has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the U.S. Department of Veterans Affairs' (VA's) proposed acquisition of approximately 156 acres of land located southerly adjacent to Ohio Western Reserve National Cemetery (OWRNC) for the future expansion of the cemetery. This EA has been prepared as required 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), and *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26), and relevant guidance from *VA NEPA Interim Guidance for Projects* (2010).

The 156-acre Site, currently occupied by Rawiga Golf Club (10353 Rawiga Road in Seville, Ohio), has been offered to VA for purchase by the current owners. VA would acquire the Site in 2022, while available for purchase, would lease it back to the current owners for continued operation of the golf course for at least 15 years, and would later expand the cemetery onto the Site. At that time and as part of the cemetery design process, VA will perform a supplemental NEPA analysis to reanalyze and reevaluate the potential effects of the construction and operation of the expanded cemetery at the Site. VA will incorporate the minimization, management, and avoidance measures identified in this EA into that future design process and supplemental NEPA analysis to minimize potential adverse environmental effects.

This approach is fully consistent with the NEPA and CEQ Regulations. In cases such as this, the CEQ Regulations establish and recommend a "tiered" approach to the environmental impact analysis process: "Agencies are encouraged to tier their environmental (documents)…to focus on the actual issues ripe for decision at each level of environmental review….Tiering may also be appropriate for different stages of actions" (40 CFR Part 1502.20). These regulations specify that such potentialities (i.e., the ultimate construction and operation of the expanded cemetery) should be introduced, but can be deferred to future analyses and documentation when they have "ripened," or when more complete information becomes available.

As such, this EA assesses the potential effects of acquiring the Site for the ultimate expansion of the OWRNC, and preliminarily assesses the effects of the future proposed construction and operation of the cemetery on the Site. Potential effects of the construction and operation of the proposed expanded cemetery on the Site will be reanalyzed and reevaluated in a subsequent NEPA analysis concurrent with Site design, when the expansion of the OWRNC becomes necessary.

Proposed Action

The Proposed Action is to acquire approximately 156 acres of land located southerly adjacent to OWRNC, currently occupied by the Rawiga Golf Club, for the future expansion of OWRNC. VA would acquire the Site in 2022, would lease it back to the current owners for continued operation of the golf course for at least 15 years, and would later expand the cemetery on to the Site.

VA estimates the current 273-acre OWRNC property has adequate space for burials more than 50 years. However, VA may develop the expanded cemetery at the Site prior to other areas of the current OWRNC property due to its proximity to the western, developed portion of the OWRNC property. Design details of the proposed cemetery expansion at the Site do not exist at this time; however, future gravesite expansion onto the Site would be designed to be similar in appearance to the existing grounds of the OWRNC.

Purpose and Need

The purpose of the Proposed Action is to expand OWRNC to serve the interment needs of Veterans and their eligible family members in the Cleveland-Akron metropolitan area after the current burial space at OWRNC is depleted.

A larger, expanded OWRNC is needed to continue to provide national cemetery burial benefits to the regional Veteran community. VA estimates the current 273-acre OWRNC property has adequate space for burials more than 50 years. However, additional land will be needed in the future once the current OWRNC property has reached its maximum capacity.

One of the primary objectives of the VA burial program is to ensure that burial needs of Veterans and eligible family members are met. The VA National Cemetery Administration (NCA) further defines this objective on the assumption that the burial needs of a Veteran are met if they have reasonable access to a burial option (whether for caskets, remains, or cremated remains, either in-ground or in a columbarium) in a National or State Veterans Cemetery within 75 miles of the Veteran's place of residence. The Proposed Action would provide VA additional capacity needed to meet its burial objectives for eligible Veterans in north-central Ohio.

Alternatives

This EA examines in-depth two alternatives, the Proposed Action and the No Action Alternative, defined as follows:

- **Proposed Action:** VA would acquire approximately 156 acres of land contiguous to the south of the OWRNC, currently occupied by Rawiga Golf Club, for the future expansion of the cemetery. After acquisition, VA would lease the property back to the current owners for continued operation of the golf course for at least 15 years, and would later incorporate the Site into the cemetery. Future cemetery expansion onto the Site would be designed to be similar in appearance to the existing grounds of the OWRNC. The acquired land would be developed in approximately 25 to 30-acre phases to accommodate approximately 10 to 15 years of burial demand. The majority of the Site would eventually be developed with the expanded cemetery. However, environmentally sensitive areas and areas that are difficult to develop, such as wetlands, streams and areas with steep slopes, would be left undeveloped and would remain as scenic locations at the cemetery. It is anticipated that most, if not all, of the existing Site buildings and infrastructure would be removed for the expanded cemetery; however, VA would consider the reuse of existing improvements during the expanded cemetery design.
- **No Action Alternative:** Under the No Action Alternative, the Proposed Action would not be implemented. Veterans and their families residing in north-central Ohio would continue to use the OWRNC until burial space is no longer available. In the future, VA would likely seek additional land to expand the OWRNC, but may not be able to acquire land contiguous with the existing OWRNC. If no adjacent land were to be available, VA would be required to create a discontiguous cemetery annex or new national cemetery in the region to serve area Veterans and their families. The Site would likely remain a golf course for the short-term. Over the long-term, the Site might be redeveloped for a different use.

The No Action Alternative would not ensure VA has sufficient capacity at OWRNC to meet the long-term interment needs of Veterans and their families in north-central Ohio, and thus, would not meet the purpose of or need for the Proposed Action. However, the No Action Alternative was retained to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required under the CEQ Regulations.

Affected Environment and Environmental Consequences

The affected environment of the Site and its immediate surroundings, or the region of influence of the Proposed Action, is discussed in Section 3 of this EA.

The two considered alternatives, the Proposed Action and the No Action Alternative, are evaluated in this EA to determine their potential direct or indirect impact(s) on the physical, environmental, cultural, and socioeconomic aspects of the Proposed Action's region of influence.

Technical areas evaluated in this EA include:

- *Aesthetics*
- *Air Quality*
- *Cultural Resources*
- *Geology, Topography, and Soils*
- *Hydrology and Water Quality*
- *Wildlife and Habitat*
- *Noise*
- *Land Use*
- *Floodplains, Wetlands, and Coastal Zone Management*
- *Socioeconomics*
- *Community Services*
- *Solid Waste and Hazardous Materials*
- *Transportation and Parking*
- *Utilities*
- *Environmental Justice*
- *Cumulative Impacts*
- *Potential for Generating Substantial Controversy*

Potential Effects of the Proposed Action

The Proposed Action would result in the impacts identified throughout Section 3 and summarized in the table below. These include potential short-term and/or long-term adverse impacts to aesthetics, air quality, geology and soils, hydrology and water quality, wildlife and habitat, noise, land use, floodplains, wetlands, socioeconomics, solid waste and hazardous materials, transportation, and utilities. All of these potential impacts are less than significant and would be further reduced through careful implementation of the general best management practices (BMPs); management, minimization, and avoidance measures; and compliance with regulatory requirements, as identified in Section 4.

The Proposed Action would enable VA to provide National Cemetery burial benefits to the regional Veteran community after the existing OWRNC interment is depleted, a significant beneficial socioeconomic effect.

Potential Effects of the No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented. No beneficial impacts attributable to the Proposed Action would occur. Veterans and their families residing in north-central Ohio would continue to use the OWRNC until space is no longer available. Once OWRNC reaches capacity, Veterans and their families in the region would be required to travel much longer distances to the nearest National Cemetery for burial and subsequent visits, at increased cost and time.

Summary of Impact Analysis		
Resource Area	**Proposed Action**	**No Action**
Aesthetics	**No impact from Site acquisition and continued use as a golf course. Minor short-term and long-term, direct adverse impacts from future cemetery development**. Minor short-term direct adverse visual impacts during cemetery construction (heavy machinery, land disturbance, and dust). Minor long-term direct adverse aesthetic impacts as a result of the cemetery development. Cemetery would be designed in concert with the natural topography and features, visually consistent with the current OWRNC, and generally consistent with surrounding land uses. Cemetery design would include unimproved buffers and/or berms along boundaries with adjacent residences.	No impact.
Air Quality	**No impact from Site acquisition and continued use as a golf course. Minor short-term and long-term, direct adverse impacts from future cemetery development.** Minor short-term direct adverse impacts from cemetery construction (dust, particulate matter and equipment emissions) managed through BMPs. Minor local long-term direct adverse impacts due to vehicle emissions from increased visitors to the cemetery, off-set by the reduction of vehicle emissions associated with the closure of the golf course.	No impact.
Cultural Resources	**No impact.** No NRHP-eligible historic buildings or districts were identified at Site or the surrounding area other than the OWRNC and no NRHP-eligible archaeological resources were identified at the Site. No historic properties would be affected. The Ohio SHPO concurred with VA's no adverse effect determination.	No impact.

Summary of Impact Analysis		
Resource Area	**Proposed Action**	**No Action**
Geology and Soils	**No impact from Site acquisition and continued use as a golf course. Minor short-term and negligible long-term, direct adverse impacts from future cemetery development.** Minor short-term direct adverse soil erosion and sediment impacts during cemetery construction managed through BMPs. Negligible long-term direct adverse impacts to prime farmland soils not currently in agricultural use being permanently converted to non-agricultural uses.	No impact.
Hydrology and Water Quality	**No impact from Site acquisition. Minor adverse impacts from initial continued use of the Site as a golf course. Minor short-term direct adverse impacts from future cemetery development.** Minor direct adverse water quality effects from Rawiga Golf Club's continued, permitted discharge of water treatment residuals through an injection well and wastewater treatment effluent to Tommy Run. Minor short-term direct adverse stormwater runoff impacts during cemetery construction managed through BMPs. Potential impacts to streams would be avoided, to the extent possible. If the cemetery design requires the removal of existing bridges or the installation of new culverts or bridges for cemetery roads crossing the streams, minor, short-term surface water impacts could occur. Cemetery would be designed in concert with the current drainage patterns and would include on-site stormwater retention with no/negligible long-term water quality impact.	Minor direct adverse water quality effects from the continued, permitted discharge of water treatment residuals through an injection well and wastewater treatment effluent to Tommy Run.

Summary of Impact Analysis		
Resource Area	**Proposed Action**	**No Action**
Wildlife and Habitat	**No impact from Site acquisition and continued use as a golf course. Minor short-term direct adverse impacts from future cemetery development.** Minor potential short-term adverse impact during construction. Site provides potential summer roosting habitat for federally-listed Indiana and northern long-eared bats. It is anticipated that tree clearing would be conducted between October 1 and March 31, outside of the bat roosting season. If tree clearing cannot be conducted outside of the bat roosting season, a summer presence/absence survey would be conducted to confirm protected bats are not present prior to tree clearing. VA would re-evaluate the potential for protected species at the Site during the future cemetery expansion design and would coordinate and consult with USFWS and ODNR prior to cemetery construction, as necessary.	No impact.
Noise	**No impact from Site acquisition and continued use as a golf course. Minor short-term and long-term, direct adverse impacts from future cemetery development.** Minor short-term direct adverse heavy equipment noise impacts and material transportation noise impacts during cemetery development controlled through construction BMPs. Minor long-term operational direct adverse noise impacts associated with occasional heavy equipment use and ceremonial rifle fire (approximately 5 to 10 times per day) during weekday business hours, similar to existing OWRNC operational noise.	No impact.
Land Use	**No impact from Site acquisition and continued use as a golf course. Minor long-term, direct adverse impacts from future cemetery development.** Minor long-term direct adverse impact as a result of the Site's conversion from a golf course into a cemetery. However, cemetery would be consistent with adjacent OWRNC development and compatible with surrounding land uses.	No impact.

Summary of Impact Analysis		
Resource Area	**Proposed Action**	**No Action**
Floodplains, Wetlands, and Coastal Zone Management	**No impact from Site acquisition and continued use as a golf course. Minor potential short-term and long-term direct adverse impacts from future cemetery development.** The Site contains Tommy Run, an intermittent tributary to Tommy Run, six manmade ponds, two ephemeral streams, and two small wetlands, all of which would likely be considered jurisdictional waters of the US (WOTUS). The Site also contains a floodway associated with Tommy Run, and areas along the floodway are within the 100-year or 500-year floodplain. The cemetery would be designed to avoid the identified wetlands, other regulated WOTUS, and floodplains, to the extent possible. If the wetlands/WOTUS cannot be fully avoided, VA would obtain all necessary permits and approvals from USACE and OEPA, and would implement any required mitigation measures. Any floodplain construction would be minor, such as for the construction of a bridge to span Tommy Run. VA would compensate for any construction within the floodplain during the site design. No coastal zone impacts; the Site area is not located within Ohio's designated coastal zone.	No impact.
Socioeconomics	**No impact from Site acquisition and continued use as a golf course. Minor short-term beneficial, minor long-term adverse, and significant long-term beneficial impacts from future cemetery development.** Minor short-term indirect beneficial impacts to local economy as a result of temporary construction jobs. Minor long-term adverse impacts from the loss of jobs and recreational facilities from the closure of the golf course. Given the relatively low number of jobs provided by the golf course and the availability of other golf courses in the local area, these impacts would be minor. Significant long-term direct beneficial impact by providing a regionally proximate national cemetery for north-central Ohio area Veterans and their families once the existing OWRNC reaches its burial capacity.	Inadequate VA cemetery options – long-term direct adverse impact to local Veterans and their families.
Community Services	**No/negligible impact.** Proposed cemetery expansion would put minimal additional load on the local police department and other community services.	No impact.

Summary of Impact Analysis		
Resource Area	**Proposed Action**	**No Action**
Solid and Hazardous Materials	**No impact from Site acquisition. Minor adverse impacts from initial continued use of the Site as a golf course. Minor short-term and long-term direct adverse impacts from future cemetery development.** Minor adverse effects from Rawiga Golf Club's continued storage, handling and use of petroleum products and hazardous materials associated with golf course operations. Prior to the termination of the golf course lease, sampling would be conducted in the areas of petroleum product and hazardous materials storage and handling to confirm that no releases have occurred. Any contamination that is identified would be remediated and/or managed, as required, to prevent unacceptable human and ecological exposures. Potential minor short-term and long-term direct adverse impacts from petroleum/hazardous substance storage and handling during cemetery construction and operation managed through standard BMPs.	Minor adverse effects from the continued storage, handling and use of petroleum products and hazardous materials associated with golf course operations.
Traffic, Transportation, and Parking	**No impact from Site acquisition and continued use as a golf course. Minor short-term and long-term, direct adverse impacts from future cemetery development.** Minor short-term direct adverse impacts associated with cemetery construction traffic on local roads. Minor long-term traffic impacts associated with cemetery operation. Burial traffic would remain at current levels as the rate of burials is anticipated to remain the same. The expanded cemetery would result in an increase in visitors. However, the increased cemetery visitor traffic would likely be mostly off-set by the reduction of traffic from the closure of the golf course. No parking impacts, proposed cemetery would include adequate on-site parking.	No impact.

Summary of Impact Analysis		
Resource Area	**Proposed Action**	**No Action**
Utilities	**No impact from Site acquisition. Minor adverse impacts from initial continued use of the Site as a golf course. Minor potential long-term direct adverse impacts from future cemetery development.** Minor direct adverse impacts from Rawiga Golf Club's continued, permitted discharge of water treatment residuals through an injection well and wastewater treatment effluent to Tommy Run. Negligible short-term local utility impacts; most utilities needed by the expanded cemetery are already located on the Site or the adjacent OWRNC. No additional connections to distant lines are required. Minor potential long-term direct adverse utility impact associated with the potential use of municipal water to supplement the use of surface water for expanded cemetery irrigation. The cemetery may also use an irrigation well and would likely use on-site septic systems for any new Site buildings with restrooms. Utility availability and connections would be determined during the cemetery design.	Minor direct adverse impacts from the continued, permitted discharge of water treatment residuals through an injection well and wastewater treatment effluent to Tommy Run.
Environmental Justice	**No/negligible impact.** The Site is not located in an area with elevated low-income or minority populations.	Regional low-income Veterans and their families would have to travel to a more distant national cemetery at increased cost, a minor long-term adverse impact.

Cumulative Impacts

This EA also examines the potential cumulative effects of implementing each of the considered alternatives. This analysis finds that the Proposed Action, with the implementation of the BMPs; management, minimization, and avoidance measures; and regulatory compliance measures specified in this EA, would not result in significant adverse cumulative impacts to onsite or regional, natural or cultural resources, and would maintain or enhance the socioeconomic environment of the area through the long-term provision of required National Cemetery facilities for regional Veterans and their families. The No Action Alternative would not produce these potential beneficial socioeconomic gains.

Agency and Public Involvement

Agencies consulted for this EA include:

- U.S. Fish and Wildlife Service (USFWS)
- U.S. Environmental Protection Agency (USEPA)
- U.S. Army Corps of Engineers (USACE)
- U.S. Department of Agriculture Natural Resource Conservation Service
- Ohio Department of Natural Resources (various divisions)
- Ohio Department of Transportation - District 3
- Ohio Environmental Protection Agency (OEPA) (various divisions)
- Ohio History Connection (State Historic Preservation Office (SHPO))
- Medina County (various departments)
- Akron Regional Air Quality Management District
- Rittman Planning Commission
- Wayne County (various departments)
- Wayne County Historical Society
- Milton Township
- Native American Tribes

Responses were received from USEPA, USFWS, Ohio SHPO, OEPA, the Wayne County Planning Department, and the Eastern Shawnee Tribe of Oklahoma. Input provided by these agencies is summarized in Section 6. Agency information and comments have been incorporated into this EA, as and where appropriate. Copies of relevant correspondence can be found in Appendix B.

In April 2022, VA initiated National Historic Preservation Act (NHPA) Section 106 consultation with the Ohio SHPO regarding the Proposed Action. The Section 106 consultation letter sent to the Ohio SHPO included a description of VA's proposed undertaking (Proposed Action), definition of the area of potential effect (APE), identification of historic properties, and VA's finding of effects on historic properties (no historic properties affected). The Ohio SHPO concurred with VA's findings and no adverse effect determination in a response letter dated May 5, 2022.

In May 2022, VA initiated NHPA Section 106 consultation with 18 federally recognized Tribes with possible geographic or cultural affiliation with the Site area, the Medina County Historical Society, the Northern Ohio Golf Association, and Diamond Golf Group, LLC. The Eastern Shawnee Tribe of Oklahoma responded to the NEPA scoping. No other agencies or Tribes have responded and none have elected to participate in the Section 106 consultation process. Section 106 agency and Tribal information and comments have been incorporated in this EA (Section 3.4) and are summarized in Section 6. Section 106 correspondence is provided in Appendix C.

VA will publish and distribute the Draft EA for a 30-day public comment period, as announced by a Notice of Availability (NOA) published in the Medina Gazette and Northern Wayne Post, local newspapers of general circulation. A copy of the Draft EA will be made available for public review at a local public library and on the VA Office of Construction and Facilities Management Environmental Program website: (https://www.cfm.va.gov/environmental/index.asp). VA will also email notification of the Draft EA for review and comment, with a link to the Draft EA on VA's website, to each of the government agencies and Tribes that were contacted during the NEPA scoping and Section 106 consultation. VA will respond to agency and public comments within the Final EA.

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FIGURES

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APPENDICES

ACRONYMS AND ABBREVIATIONS

ADT	average daily traffic
ACHP	Advisory Council on Historic Preservation
APC	Air Pollution Control
APE	Area of Potential Effect
amsl	above mean sea level
ARAQMD	Akron Regional Air Quality Management District
AST	Aboveground Storage Tank
bgs	below ground surface
BMPs	Best Management Practices
CAA	Clean Air Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CZMA	Coastal Zone Management Act
dBA	decibels, A-weighted scale
dbh	diameter at breast height
DOW	Division of Wildlife
DSW	Division of Surface Water
E&S	Erosion and Sedimentation
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
ERG	Environmental Research Group
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
GTZC	Guilford Township Zoning Code
HAP	Hazardous Air Pollutants
ICRIP	Initial Cultural Resources Impact Prediction
IPaC	Information for Planning and Conservation
JD	Jurisdictional Determination
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NCA	National Cemetery Administration
NEPA	National Environmental Policy Act of 1969
NHP	Natural Heritage Program
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NOAA	National Oceanic and Atmospheric Association
NPDES	National Pollution Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetland Inventory

ODNR	Ohio Department of Natural Resources
ODOT	Ohio Department of Transportation
OEPA	Ohio Environmental Protection Agency
OSHA	Occupational Safety and Health Administration
OWRNC	Ohio Western Reserve National Cemetery
Phase I ESA	Phase I Environmental Site Assessment
Row 10	Row 10 Historic Preservation Solutions
SEA	Supplemental EA
SHPO	Ohio History Connection (State Historic Preservation Office)
SWPPP	Storm Water Pollution Prevention Plan
TTL	TTL Associates, Inc.
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VA	Department of Veterans Affairs
WOTUS	Waters of the US

1.0 INTRODUCTION, INCLUDING PURPOSE OF AND NEED FOR THE ACTION

1.1 Introduction

This Environmental Assessment (EA) 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), *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26), and relevant guidance from VA's *NEPA Interim Guidance for Projects* (U.S. Department of Veterans Affairs 2010). Federal agencies are required to consider the environmental and related social and economic effects of their proposed actions. This EA is required to determine if VA's Proposed Action would have significant environmental impacts.

This EA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's proposed acquisition of approximately 156 acres of land located southerly adjacent to Ohio Western Reserve National Cemetery (OWRNC) for the future expansion of the cemetery. The 156-acre Site is currently occupied by Rawiga Golf Club (10353 Rawiga Road in Seville, Ohio). VA would acquire the Site in 2022, while available for purchase, would lease it back to the current owners for continued operation of the golf course for at least 15 years, and would later expand the cemetery onto the Site. At that time and as part of the cemetery design process, VA will perform a supplemental NEPA analysis to reanalyze and reevaluate the potential effects of the construction and operation of the expanded cemetery at the Site. VA will incorporate the minimization, management, and avoidance measures identified in this EA into that future design process and supplemental NEPA analysis to minimize potential adverse environmental effects.

This approach is fully consistent with the NEPA and CEQ Regulations. In cases such as this, the CEQ Regulations establish and recommend a "tiered" approach to the environmental impact analysis process: "Agencies are encouraged to tier their environmental (documents)…to focus on the actual issues ripe for decision at each level of environmental review….Tiering may also be appropriate for different stages of actions" (40 CFR Part 1502.20). These regulations specify that such potentialities (i.e., the ultimate construction and operation of the expanded cemetery) should be introduced, but can be deferred to future analyses and documentation when they have "ripened," or when more complete information becomes available.

As such, this EA assesses the potential effects of acquiring the Site for the ultimate expansion of the OWRNC, and preliminarily assesses the effects of the future proposed construction and operation of the cemetery on the Site. Potential effects of the construction and operation of the proposed expanded cemetery on the Site will be reanalyzed and reevaluated in a subsequent NEPA analysis concurrent with Site design, when the expansion of the OWRNC becomes necessary.

In accordance with the cited regulations, this EA allows for public input into the federal decision-making process; provides federal decision-makers with an understanding of potential environmental effects of their decisions, before making these decisions; identifies measures the federal decision-maker could implement to reduce potential environmental effects; and documents the NEPA process.

1.2 Background

VA conducted an Environmental Impact Statement (EIS) for the creation of a new national cemetery in north-central Ohio in 1992. The current OWRNC property, approximately 273 acres of land at 10175 Rawiga Road in Rittman, Medina County, Ohio, was identified as the environmentally preferred alternative. VA acquired the current OWRNC property in 1998 and the cemetery opened in 2000. The VA National Cemetery Administration (NCA) develops national cemeteries in phases, with each phase including approximately 10 to 15 years of burial capacity. The initial OWRNC development included approximately 65 acres in the western portion of the property, accessed from Rawiga Road. The central portion of the OWRNC property is heavily wooded along Tommy Run, a stream that bisects the property from north to south. The eastern portion of the OWRNC property is leased for farming.

In 2015, VA completed an EA for the development of approximately 30 additional acres within the western portion of the OWRNC property for increased burial capacity (second phase of cemetery development). In 2018, VA completed a Supplemental EA (SEA) to accommodate design changes. The Finding of No Significant Impact (FONSI) was signed in February 2020. VA anticipates the new, second phase of cemetery development will provide 10 additional years of burial capacity (through approximately 2032).

VA estimates the current 273-acre OWRNC property has adequate space for burials more than 50 years. However, additional land will be needed in the future to continue to provide national cemetery burial benefits to Veterans and their families in north-central Ohio once the current OWRNC property has reached its maximum capacity. The 156-acre Site, located contiguous to the OWRNC, has been offered to VA for purchase by the current owners.

The Site is located along the east side of Rawiga Road, east of its intersection with Schaub Road, and directly south of OWRNC. The Site consists of three parcels. The northern, primary parcel (approximately 150 acres) is located in Medina County (Guilford Township) and the two southern parcels (total approximately 6 acres) are located in Wayne County (Milton Township).

The Site is currently occupied by a golf club, consisting of an 18-hole golf course with associated golf cart paths, six ponds, sand traps, one picnic pavilion and three shelters, a covered bridge, and eleven buildings. The swimming pool associated with the golf club was permanently closed (filled) in late 2021. The Site buildings (all located on the southwestern portion of the Site) include a clubhouse and golf pro shop, a concession stand, a pool house, a golf cart storage building, a pump house, a vacant storage building, a maintenance shop, two storage buildings, and two sheds. Tommy Run flows north-south across the central portion of the Site and a small unnamed tributary to Tommy Run flows south across the northwestern portion of the Site. From at least 1873 to the early 1950s, the southwestern portion of the Site was occupied by a residence with associated agricultural buildings. The remainder of the Site consisted of agricultural and wooded land at that time. The Site was developed as a golf course in the late 1950s, which has been in operation since 1959.

Figures 1 through 3 depict the locations of the current OWRNC property and the Site.

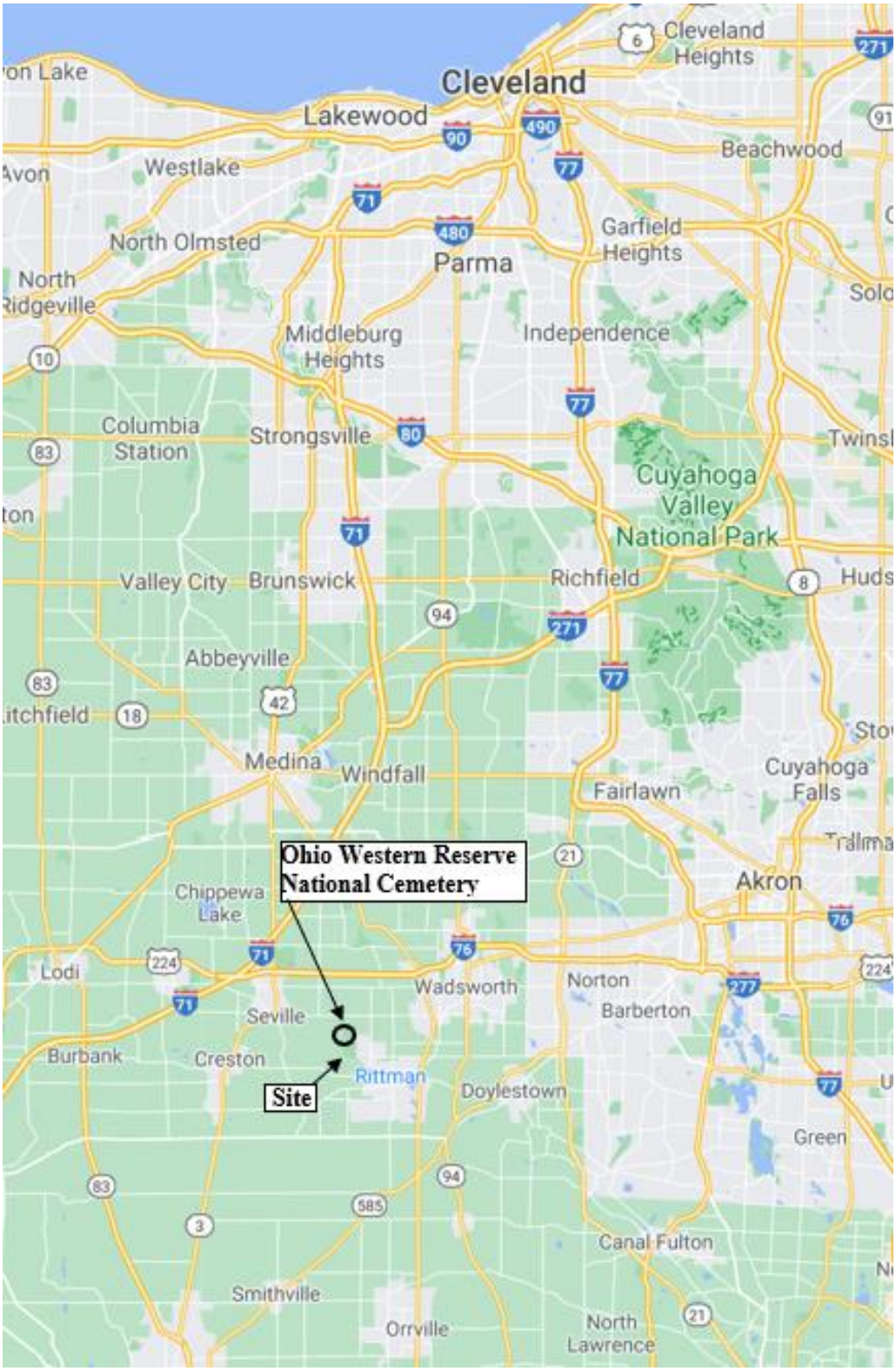

Figure 1 Location of Ohio Western Reserve National Cemetery

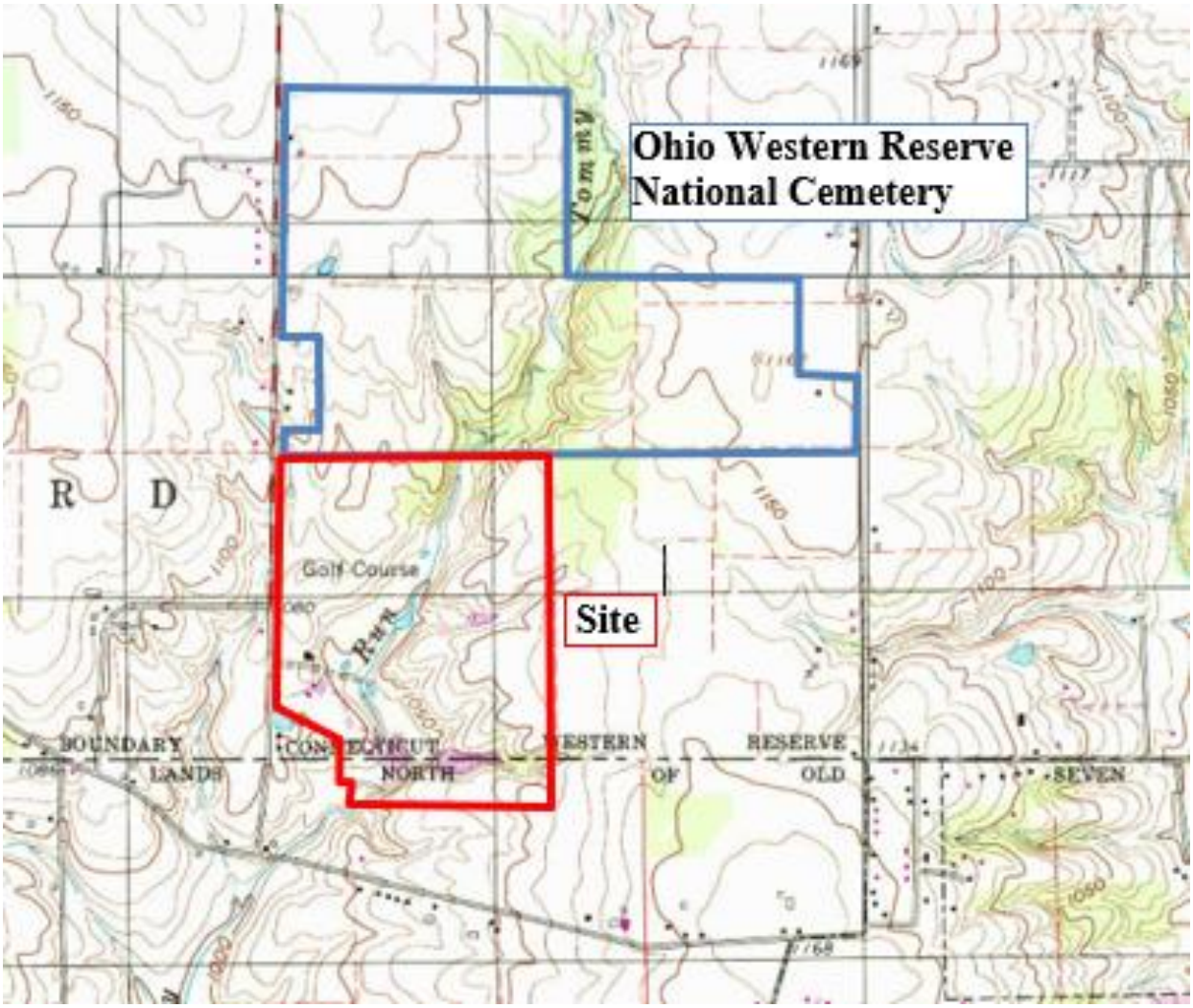

Figure 2 Site Topographic Location Map (Seville and Rittman, Ohio 1994)

Figure 3 Aerial Photograph of OWRNC and Site

1.3 Purpose and Need

The purpose of the Proposed Action is to expand OWRNC to serve the interment needs of Veterans and their eligible family members in the Cleveland-Akron metropolitan area after the current burial space at OWRNC is depleted.

A larger, expanded OWRNC is needed to continue providing national cemetery burial benefits to the regional Veteran community. VA estimates the current 273-acre OWRNC property has adequate space for burials more than 50 years. However, additional land will be needed in the future once the current OWRNC property has reached its maximum capacity.

One of the primary objectives of the VA burial program is to ensure that burial needs of Veterans and eligible family members are met. NCA further defines this objective on the assumption that the burial needs of a Veteran are met if they have reasonable access to a burial option (whether for caskets, remains, or cremated remains, either in-ground or in a columbarium) in a National or State Veterans Cemetery within 75 miles of the Veteran's place of residence. The Proposed Action would provide VA additional capacity needed to meet its burial objectives for eligible Veterans in the north-central Ohio area.

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1 Introduction

This Section provides information regarding the Proposed Action and its alternatives, including those that VA initially considered, but eliminated, and the reasons for eliminating them. The screening criteria and process developed and applied by VA to hone the number of reasonable alternatives are described, providing the reader with an understanding of VA's rationale in ultimately analyzing the Proposed Action and the No Action Alternative in this EA.

2.2 Proposed Action

The Proposed Action is to acquire approximately 156 acres of land located southerly adjacent to OWRNC, currently occupied by Rawiga Golf Club, for the future expansion of OWRNC. VA would acquire the Site in 2022, while available to purchase, would lease it back to the current owners for continued operation of the golf course for at least 15 years, and would later expand the cemetery on to the Site.

VA estimates the current 273-acre OWRNC property has adequate space for burials more than 50 years. However, VA may develop the expanded cemetery at the Site prior to other areas of the current OWRNC property due to its proximity to the western, developed portion of the OWRNC property. Design details of the proposed cemetery expansion at the Site do not exist at this time; however, future gravesite expansion onto the Site would be designed to be similar in appearance to the existing grounds of the OWRNC.

VA would follow the NCA *Facilities Design Guide* in the OWRNC expansion design. Based on the *Design Guide*, the proposed OWRNC expansion would generally include the following components:

- A road connecting to the existing OWRNC. Roadways would be approximately 28 feet wide and would wind throughout the cemetery in harmony with the natural grade and environmental features of the land. Roadways would loop back around the property to maintain a complete, simple traffic pattern around the cemetery. All of the roadways would have a speed limit of 15 miles per hour (mph).
- Existing committal shelters at the OWRNC would continue to be used for ceremonies (there are no grave-side ceremonies at national cemeteries). However, additional committal structures may be constructed at the Site. These shelters would be designed and located where there are scenic views, maximum weather protection, and minimal potential for noise disruption.
- The acquired land would be developed in phases. Each phase would develop enough gravesites and columbarium niches needed to accommodate approximately 10 to 15 years of burial demand. Cremation sites, casket gravesites, and columbarium would be developed in each subsequent phase. The size of each phase, and the total number of phases, is currently unknown. However, each phase is estimated to include approximately 25 to 30 acres.
- Environmentally constrained areas, such as wetlands and streams, and areas that are otherwise difficult to develop (e.g., steeper slopes) would be left undeveloped and remain as scenic locations at the cemetery. The utilized portions of the Site would be developed to within 20 feet of the Site boundaries.
- The standard for NCA design is to achieve on-site cut-and-fill soil balance as much as practical. Proposed development would primarily be located in relatively level areas, following natural contours to the extent possible. Areas may be minimally leveled to develop a consistent grade with each phase. Development would include the installation of grave sites, which would consist of

gravel base, drainage piping, and pre-placed concrete vault/crypt system. Approximately 20-22 inches of soil would be placed on top of each vault/crypt. This design would provide the most space-efficient option. Each grave site would be marked with a small, upright marble headstone.

- Utilities, including potable and irrigation water, electric, and other supporting infrastructure would be extended throughout the Site, as required.
- It is anticipated that most, if not all, of the existing Site buildings and infrastructure would ultimately be removed for the expanded cemetery. However, VA would consider the reuse of existing improvements, where applicable, during the cemetery design.

Prior to construction, VA would obtain all applicable, required federal, state, and local permits for the proposed cemetery development from appropriate government authorities. VA would avoid any significant onsite environmental resources through sensitive site design, including avoidance of significant natural resources.

2.3 Alternatives Development

NEPA, CEQ Regulations, and 38 CFR Part 26 require reasonable alternatives to be explored and objectively evaluated. Alternatives that are eliminated from detailed study must be identified along with a brief discussion of the reasons for eliminating them. For purposes of analysis, an alternative was considered "reasonable" only if it would enable VA to accomplish the primary mission of providing a suitable expanded cemetery site that meets the purpose of and need for the Proposed Action, including availability at a price consistent with the fair market value based on an independent appraisal, or donation. "Unreasonable" alternatives would not enable VA to meet the purpose of and need for the Proposed Action.

Although VA estimates the current OWRNC property contains adequate space for burials for more than 50 years, additional land, preferably adjacent to the existing OWRNC, will be needed to meet the interment needs of regional Veterans and their families in the future. NCA considers adjacent/contiguous property to be the first and best option for cemetery expansion. National cemetery expansion onto adjacent land is the most cost effective and operationally efficient manner to expand an existing national cemetery. Doing so promotes efficiencies and allows the new gravesite areas to be operated by the same staff that operates the existing grounds, with no need for remote staff, remote buildings, and remote equipment. It also eliminates potential visitor directional and wayfinding confusion that can occur with a remotely located property. Additionally, the regional Veteran community typically strongly prefers and supports the expansion of existing national cemeteries onto adjacent/contiguous property rather than developing a new national cemetery elsewhere on remote "annex" land.

The current Site owners offered to sell the property to VA at fair market value. After identifying the opportunity to acquire additional land adjacent to OWRNC for future expansion, VA concluded that acquiring the Site in the short-term, while available, would secure the land necessary for its long-term cemetery needs. No other sites adjacent to OWRNC were offered to VA or identified as available for acquisition. Therefore, no other sites were considered.

2.4 Alternatives Evaluated in this EA

This EA examines in-depth two alternatives, the Proposed Action and the No Action Alternative.

2.4.1 Proposed Action

VA would acquire approximately 156 acres of land contiguous to the south of the OWRNC, currently occupied by Rawiga Golf Club, for the future expansion of OWRNC. After acquisition, VA would lease the property back to the current owners for continued operation of the golf course for at least 15 years and

would later incorporate the Site into the cemetery. The Proposed Action would be implemented as described in Section 2.2.

2.4.2 No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented. Veterans and their families residing in north-central Ohio would continue to use the existing OWRNC until burial space is no longer available. In the future, VA would likely seek additional land to expand the OWRNC, but may not be able to acquire land contiguous with the existing OWRNC. If no adjacent land were to be available, VA would be required to create a discontiguous cemetery annex or new national cemetery in the region to serve area Veterans and their families. The Site would likely remain a golf course for the short-term. Over the long-term, the Site might be redeveloped for a different use.

The No Action Alternative would not ensure VA has sufficient capacity at OWRNC to meet the long-term interment needs of Veterans and their families in north-central Ohio, and thus, would not meet the purpose of or need for the Proposed Action. However, the No Action Alternative was retained to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required under the CEQ Regulations.

2.5 Alternatives Eliminated from Further Consideration

As described in Section 2.3, VA was presented the opportunity to acquire the approximately 156-acre Site located adjacent to the south of OWRNC for future expansion of the cemetery. VA concluded that acquiring the Site in the short-term, while available, would secure the land necessary to meet its long-term cemetery needs. No other land adjacent to the OWRNC was offered to VA or identified as available for acquisition.

3.0 AFFECTED ENVIRONMENT & ENVIRONMENTAL CONSEQUENCES

3.1 Introduction

This Section describes the baseline (existing) physical, environmental, cultural, and socioeconomic conditions of the proposed OWRNC expansion Site and its general vicinity (i.e., the Proposed Action's region of influence), with emphasis on those resources potentially affected by the Proposed Action. Appendix D contains photographs of the Site and the surrounding area. Under each resource area (Sections 3.3 through 3.17), the potential direct and indirect effects of the Proposed Action and the No Action Alternative are identified. Potential cumulative impacts are discussed in Section 3.18.

Resource areas considered in this EA are as follows:

- *Aesthetics*
- *Air Quality*
- *Cultural and Historic Resources*
- *Geology and Soils*
- *Hydrology and Water Quality*
- *Wildlife and Habitat*
- *Noise*
- *Land Use*
- *Floodplains, Wetlands, and Coastal Zone Management*
- *Socioeconomics*
- *Community Services*
- *Solid Waste and Hazardous Materials*
- *Traffic, Transportation, and Parking*
- *Utilities*
- *Environmental Justice*
- *Cumulative Impacts*
- *Potential for Generating Substantial Controversy*

3.2 Criteria for Analysis of Impacts

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 sections. 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 is 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.

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.

3.3 Aesthetics

The Site is situated in a rural area of mostly agricultural and residential land, approximately 1.5 miles northwest of the City of Rittman, Ohio. The northern portion (majority) of the Site is located in Medina County (Guilford Township) and the small southern portion of the Site is located in Wayne County (Milton Township). The Site is currently occupied by an 18-hole golf course consisting of mostly grassy fairways and greens separated by strips of woods. The Site also includes six manmade ponds, one picnic pavilion and three shelters, a covered bridge, golf cart pathways, and 11 buildings (all buildings are located on the southwestern portion of the Site). Tommy Run flows north-south across the central portion of the Site and a small unnamed tributary to Tommy Run is present in the northwestern portion of the Site. The Site generally slopes from the western and eastern portions of the Site down to the central portion of the Site, towards Tommy Run. The current Site features are shown on Figure 3.

The current OWRNC property is located north and northeast of the Site and contains the developed cemetery (west), wooded undeveloped land near Tommy Run (central), and unimproved agricultural land (east). The area east of the Site is agricultural land. The areas south and west (beyond Rawiga Road) of the Site are primarily unimproved agricultural land with low-density residential development.

3.3.1 Effects of the Proposed Action

After VA's acquisition, the Site would be leased back to the current owners and operated as a golf course for at least 15 years. No new development or substantial change in land use are anticipated during this period. VA's acquisition of the Site and the initial continued use of the Site as a golf course would result in no aesthetic impacts.

Future phased development and operation of the expanded cemetery on the Site would produce visual changes, including the demolition of current Site structures and the installation of the cemetery road, perimeter fencing, maintained grassy burial areas, columbarium walls, and possibly committal shelters. VA would design and develop the cemetery in concert with the Site's topography and features, with no major grading. It is anticipated the majority of the Site would be developed for the cemetery, but Tommy Run, the tributary to Tommy Run, steeply sloping areas, and the on-Site ponds would remain mostly undisturbed. In addition, some small wooded areas would likely be preserved. The cemetery design would include unimproved buffers and/or berms along boundaries with adjacent residences to minimize potential adverse aesthetic impacts.

Given the low visual impact of the cemetery development, which would be designed in concert with the existing topography and landscape, and would be largely consistent with the surrounding land uses, no significant aesthetics impacts would occur.

3.3.2 Effects of the No Action Alternative

Under the No Action Alternative, no development or changes to the Site by VA would occur. The Site would likely remain as a golf course for the foreseeable future with no aesthetic impacts.

3.4 Air Quality

3.4.1 Ambient Air Quality

The ambient air quality in an area can be characterized in terms of whether or not it complies with the primary and secondary National Ambient Air Quality Standards (NAAQS). The Clean Air Act, as amended (CAA and CAAA) requires the U.S. Environmental Protection Agency (USEPA) to set NAAQS for pollutants considered harmful to public health and the environment. NAAQS are provided for the principal pollutants, called “criteria pollutants”, which include carbon monoxide, lead, nitrogen oxides, ozone, particulate matter, and sulfur dioxide.

Areas are designated by the USEPA as “attainment”, “non-attainment”, “maintenance”, or “unclassified” with respect to the NAAQS. Regions in compliance with the standards are designated as “attainment” areas. In areas where the applicable NAAQS are not being met, a “non-attainment” status is designated. Areas that have been classified as "non-attainment", but are now in compliance can be re-designated "maintenance" status if the state completes an air quality planning process for the area.

The General Conformity Provision of the CAA, including the USEPA’s implementation mechanism, the General Conformity Rule, prohibits the federal government from conducting, supporting, or approving any actions that do not conform to a USEPA-approved State Implementation Plan (SIP). A SIP is a state's self-authored blueprint for achieving and maintaining compliance with the goals of the CAA. Federal actions with emissions clearly at or below de minimis levels listed in 40 CFR 93.153(b) are exempt from the General Conformity Regulations.

According to the USEPA Green Book website (June 2022), Medina County is a designated marginal non-attainment area for 8-hour ozone (2015) and maintenance area for 8-hour ozone (2008) and $PM_{2.5}$ (2006), and is in attainment for the remaining NAAQS pollutants. Wayne County is in full attainment of the national air quality standards for the NAAQS pollutants.

3.4.2 State and Local Regulations

The Ohio Environmental Protection Agency (OEPA), Air Pollution Control (APC) promotes air compliance through the agency’s district offices and the approved local program offices (Akron Regional Air Quality Management District (ARAQMD). The Ohio Administrative Code for air quality requires reasonably available control measures (such as water or chemical dust suppression) to prevent fugitive dust from becoming airborne during construction and demolition.

Medina County and Wayne County do not maintain air quality ordinances.

3.4.3 Greenhouse Gases and Climate Change

In December 2014, CEQ released its revised draft guidance for federal agencies on consideration of greenhouse gas (GHG) emissions and the effects of climate change in NEPA reviews, which describes how federal agencies should consider the effects of GHG emissions and climate change in their NEPA decision-making documents. The guidance indicates that federal agencies should consider both the potential effect of a proposed action on climate change, as indicated by its estimated GHG emissions, and the implications of climate change for the environmental effects of a proposed action. The guidance indicates that the agency analysis should be commensurate with the projected GHG emissions and climate impacts of the proposed action. It recommends that agencies consider 25,000 metric tons of carbon dioxide equivalent emissions on an annual basis as a threshold below which quantitative analysis of GHG is not recommended.

3.4.4 Sensitive Receptors

CEQ's NEPA regulations require evaluation of the degree to which the proposed action affects public health. Sensitive receptors for air quality impacts include hospitals, schools, daycare facilities, elderly housing and convalescent facilities, and residences. Sensitive air quality receptors in the immediate vicinity of the Site include three residences located approximately 300 to 500 feet to the north, three residences located approximately 200 to 400 feet to the south, and two residences located approximately 100 to 300 feet to the west of the Site. Additional residences are located approximately 800 feet or more to the north, south and west of the Site. No hospitals, schools, daycare facilities, elderly housing or convalescent facilities are located within 0.50-mile of the Site.

3.4.5 Effects of the Proposed Action

VA's acquisition of the Site and the initial continued use of the Site as a golf course would result in no air quality impacts.

Air emissions generated from the future cemetery development would be expected to have direct and indirect short-term and long-term minor adverse impacts to the existing air quality environment. Short-term direct increased air emission levels would occur during each phase of cemetery construction. Long-term direct and indirect emissions would occur during the operation of the cemetery as a result of cemetery operations and visitor vehicle emissions.

Construction activities would be performed in accordance with federal and state air quality requirements. Construction-related emissions are generally short-term, but may still have adverse impacts on air quality, primarily due to the production of dust. Dust can result from a variety of activities, including excavation, grading, and vehicle travel on paved and unpaved surfaces. Dust from construction can lead to adverse health effects and nuisance concerns, such as reduced visibility on nearby roadways. The amount of dust is dependent on the intensity of the activity, soil type and conditions, wind speed, and dust suppression activities used. Implementing dust control measures (BMPs) greatly reduces dust emissions from construction. Construction-related emissions also include the exhaust from the operation of construction equipment, including diesel particulate matter (DPM). The use of newer construction equipment with emissions controls and minimizing the time that the equipment is idling (BMPs) reduce construction equipment exhaust emissions. Construction workers daily commuting in their personal vehicles would also result in negligible increased criteria pollutant emissions. Implementation of BMPs, discussed in Section 4, would minimize these anticipated minor, short-term, construction-related, air quality impacts.

During operation of the cemetery at the Site, there would be vehicular emissions associated with Site visits by Veterans and their families. However, burial traffic and cemetery visitors are already drawn to the Site area by the existing OWRNC. VA does not expect an increase in the rate of interments and anticipates only a minor increase in cemetery visitors as a result of the cemetery expansion. Existing vehicle traffic associated with the golf course would cease when the cemetery expansion occurs, off-setting cemetery traffic during non-winter months. Therefore, new vehicle traffic and vehicular air emissions associated with the operation of the expanded cemetery at the Site would be minor. Cemetery operational air emissions, associated with interments and grounds maintenance, would be negligible.

The Site is located in a marginal non-attainment/maintenance area for ozone and maintenance area for particulate matter; therefore, VA would be subject to the CAA General Conformity Rule. Based on preliminary air quality modeling, criteria air pollutant emissions from the cemetery expansion construction activities are anticipated to be well below the de minimis emission levels. Consequently, a Conformity Determination is not likely to be required.

The Proposed Action would have a negligible contribution to long-term global climate change. Direct GHG emissions from the short-term use of vehicles and mechanical equipment during construction activities would cease after the construction has been completed. Indirect GHG emissions from the vehicle traffic to

and from the cemetery are anticipated to be minor. GHG emissions as a result of Proposed Action construction and operational activities are anticipated to be well below the threshold of 25,000 metric tons of carbon dioxide annually.

3.4.6 Effects of the No Action Alternative

Under the No Action Alternative, no air quality impacts associated with VA's Proposed Action would result. The Site would likely remain a golf course with no additional air quality impacts.

3.5 Cultural and Historic Resources

Cultural resources include both historic and prehistoric archaeological resources, as well as historic structures in the built environment. This impact analysis focuses on sites and structures listed in, or eligible for nomination to, the National Register of Historic Places (NRHP), the regulations (36 CFR Part 800) for implementing Section 106 of the National Historic Preservation Act (NHPA) of 1966, and cultural items as defined in the Native American Graves Protection and Repatriation Act (NAGPRA).

From at least 1873 to the early 1950s, the southwestern portion of the Site was occupied by a residence with associated agricultural buildings. The remainder of the Site consisted of agricultural and wooded land at that time. The Site was developed as a golf course in the late 1950s, which has been in operation since 1959.

Row 10 Historic Preservation Solutions (Row 10) conducted an Initial Cultural Resources Impact Prediction (ICRIP) for the 156-acre Site on behalf of VA in February 2022. The ICRIP study included a records and literature search of Ohio History Connection (Ohio State Historic Preservation Office or SHPO), National Historic Landmarks (NHL), and NRHP data, and a pedestrian survey of the Site by an architectural historian. No NRHP-listed or eligible historic buildings or districts were identified at or adjacent to the Site, with the exception of the OWRNC (all national cemeteries are considered eligible for listing on the NRHP). However, because the golf course had been laid out by a noted golf course architect (E. Lawrence Packard) and could possibly be considered a historic landscape, Row 10 also conducted a Determination of Eligibility for Rawiga Golf Course in February 2022. This analysis found that the golf course was not a historic landscape eligible for listing in the NRHP due to the lack of evidence of tying all 18 holes to Mr. Packard, the lack of his signature design elements, and the diminution of design integrity.

Ohio Valley Archaeology, Inc. (OVAI) completed a Phase I Archaeological Survey for the Site in February 2022 that included a cultural resource records review, a historic map and aerial photograph review, and archaeological pedestrian reconnaissance and shovel testing with intervals determined according to high, moderate, and low probability zones previously designated in discussions with the Ohio SHPO. A total of 474 shovel test pits were excavated within the project area. Subsurface disturbance was noted throughout the Site, likely related to earthmoving activities from the golf course construction. One archaeological site (an artifact scatter) was identified in the southwestern portion of the Site, likely associated with the demolition of the former farm complex at the Site. OVAI concluded that the archaeological site lacks temporal and physical integrity and recommended the archaeological site as not eligible for the NRHP. Due to the extensive modification from the golf course construction and lack of any other archaeological materials encountered during the survey, no further archaeological work was recommended.

3.5.1 Effects of the Proposed Action

Based on the findings and conclusions from the 2022 ICRIP study, Determination of Eligibility for the golf course, and the Phase I Archaeological Survey, no NRHP-listed or eligible historic buildings, districts, or landscapes were identified at the Site or within the immediate Site area (except the OWRNC) and no NRHP-eligible archaeological sites were identified at the Site. Therefore, no impacts to NRHP-listed or eligible

historic properties would occur as a result of the Proposed Action. The expansion of a national cemetery does not constitute an adverse effect to historic properties.

On April 6, 2022, VA initiated NHPA Section 106 consultation with the Ohio SHPO regarding the Proposed Action. The Section 106 consultation letter sent to the Ohio SHPO included a description of VA's proposed undertaking (Proposed Action), definition of the area of potential effect (APE), identification of historic properties (the results of the ICRIP, Determination of Eligibility, and Phase I Archaeological Survey), and VA's finding of effects on historic properties (no historic properties affected). The Ohio SHPO concurred with VA's findings and no adverse effect determination in a response letter dated May 5, 2022.

In May 2022, VA initiated NHPA Section consultation with federally recognized Tribes with possible geographic or cultural affiliation with the Site area, the Medina County Historical Society, the Northern Ohio Golf Association, and Diamond Golf Group, LLC. These Section 106 consultation letters included a description of VA's proposed undertaking, definition of the APE, the identification of historic properties, and VA's finding of effects on historic properties (no historic properties affected). In response to the NEPA scoping request, the Eastern Shawnee Tribe of Oklahoma stated the Proposed Action poses no adverse effect or endangerment to known sites of interest to the Eastern Shawnee Tribe. No other agencies or Tribes have responded or elected to participate in the Section 106 consultation process.

Section 106 correspondence is provided in Appendix C.

3.5.2 Effects of the No Action Alternative

Under the No Action Alternative, no cultural resource impacts would occur.

3.6 Geology and Soils

The Rittman, Ohio United States Geological Survey (USGS) Topographic Quadrangle (dated 1994) indicates surficial topography at the Site generally slopes from the east and northwest down to a valley in the central and southwestern portions of the Site that contains Tommy Run. Elevations in the eastern portion of the Site range from approximately 1,100 to 1,120 feet above mean sea level (msl). Elevations in the northwestern portion of the Site range from approximately 1,090 to 1,110 feet above msl. Elevations in the valley range from 1,040 to 1,050 feet above msl. Tommy Run flows south to Chippewa Creek, which flows to the Tuscarawas River. The Tommy Run valley has a general regional slope to the south towards Chippewa Creek, located approximately two miles southeast of the Site. Figure 2 provides a topographic map of the Site area.

According to the Physiographic Regions of Ohio, the Site is located in the Killbuck-Glaciated Pittsburgh Plateau section of the Glaciated Allegheny Plateaus province of the Appalachian Plateau physiographic region in Ohio. The geology of the Killbuck-Glaciated Pittsburgh Plateau consists of thin to thick Wisconsian-age clay to loam till over Mississippian-age and Pennsylvanian-age shales, sandstones, conglomerates and coal.

Water well logs were obtained from the Ohio Department of Natural Resources (ODNR) Water Wells Viewer online mapping system for one former well and one current well installed near the golf course buildings in the southwestern portion of the Site in 1964. The stratigraphy at the former well reportedly consisted of clay from 0 to 22 feet below ground surface (bgs), sand from 22 to 28 feet bgs, gravelly clay from 28 to 110 feet bgs, and sand from 110 to approximately 164 feet bgs, where bedrock was encountered. Bedrock consisted of shale and sandy shale to 260 feet bgs. The stratigraphy at the current well reportedly consisted of clay and gravel to approximately 52 feet bgs, where bedrock was encountered. Shale, sandy shale, and sandstone were interbedded from approximately 62 to 250 feet bgs.

TTL Associates, Inc. (TTL) completed a geotechnical investigation of the Site during August and September 2021. Thirteen soil borings were conducted during the geotechnical investigation to a depth of approximately 15 feet bgs. Soils encountered generally consisted of clay and silt with varying amounts of sand. Some sand intervals were also encountered. No bedrock was encountered in the geotechnical soil borings.

The ODNR Karst Interactive Map indicated the Site area is not underlain by limestone bedrock conducive to karst conditions (dissolution creating voids and/or sinkholes).

Northeastern Ohio has experienced more than 100 felt earthquakes since 1836; most have been small and caused little or no damage, and have occurred in the northeastern most counties (Lake and Ashtabula Counties). There is little seismic activity in the Site area. The Site is not located in or near an active fault zone (ODNR Division of Geological Survey 2020).

Commercial quantities of oil and gas have been found in 67 of Ohio's 88 counties. According to the ODNR Oil and Gas Well Map, an oil and gas well was installed in the northern portion of the Site, near the eastern side of Tommy Run in 1929 (see Figure 4). According to the oil and gas well log, the well was completed to a depth of 3,566 feet bgs. Remarks on the log noted the possibility of gas and oil was identified at a depth of approximately 3,500 feet. No records were identified that indicate the well actively produced oil and/or gas and no well abandonment information was identified. No evidence of the oil and gas well was observed during the Site reconnaissance; Site representatives indicated they are not aware of any oil and gas wells at the Site.

The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey indicates that the Site contains 6 soil types and 10 soil map units. The soils include the following:

- The Chili loam (2 to 6 percent slopes) soil series is located in the central portion of the Site and consists of well drained loam, gravelly loam, gravelly clay loam, and loamy sand.
- The Lobdell silt loam (occasionally flooded) soil series is located in the central and southwestern portions of the Site (near Tommy Run) and consists of moderately well drained silt loam and stratified sandy loam to silt loam.
- The Orrville silt loam soil series is located in the northwestern portion of the Site (near the unnamed tributary) and consists of somewhat poorly drained silt loam, sandy loam, and silty clay loam.
- The Rittman silt loam soil series (2 to 6 percent slopes, 6 to 12 percent slopes eroded, 12 to 25 percent slopes eroded, 25 to 70 percent slopes, and 12 to 18 percent slopes eroded) is located over a majority of the Site and consists of moderately well drained silt loam and clay loam.
- The Wadsworth silt loam (0 to 2 percent slopes) soil series is located in the eastern portion of the Site and consists of somewhat poorly drained silt loam, silty clay loam, clay loam, and loam.
- The Wooster silt loam (25 to 70 percent slopes) soil series is located in the western portion of the Site and consists of well drained silt loam and loam.

The soil map is included as Figure 5.

Figure 4 Ohio Oil and Gas Well Map

CnB	Chili loam, 2 to 6 percent slopes
Le	Lobdell silt loam
Or	Orrville silt loam
RsB	Rittman silt loam, 2 to 6 percent slopes
RsC2	Rittman silt loam, 6 to 12 percent slopes, eroded
RsE2	Rittman silt loam, 12 to 25 percent slopes, eroded
RsF	Rittman silt loam, 25 to 70 percent slopes
RtD2	Rittman silt loam, 12 to 18 percent slopes, eroded
W	Water
WaA	Wadsworth silt loam, 0 to 2 percent slopes
WuF	Wooster silt loam, 25 to 70 percent slopes

Figure 5 Soils Map

3.6.1 Prime and Unique Farmland Soils

Prime farmland soils are protected under the Farmland Protection Policy Act (FPPA). The intent of the FPPA is to minimize the extent to which federal programs contribute to the unnecessary or irreversible conversion of farmland soils to non-agricultural uses. The Act also ensures that federal programs are administered in a manner that, to the extent practicable, will be compatible with private, state, and local government programs and policies to protect farmland. The USDA NRCS is responsible for overseeing compliance with the FPPA and has developed the rules and regulations for implementing the Act.

The USDA NRCS Web Soil Survey indicated that the Chili loam and Lobdell silt loam are considered to be prime farmland; the Orrville silt loam is considered to be prime farmland if drained and either protected from flooding or not frequently flooded during the growing season; the Rittman silt loam (2 to 6 percent slopes and 6 to 12 percent slopes, eroded) is considered to be farmland of local importance, and the Wadsworth silt loam is considered to be prime farmland if drained.

3.6.2 Effects of the Proposed Action

VA's acquisition of the Site and the initial continued use of the Site as a golf course would result in no geology and soils impacts.

The proposed future cemetery development at the Site would have minor impacts on geology. No major changes to topography or drainage are expected at the Site due to the development of the cemetery. The cemetery would be designed in concert with the natural topography and current drainage patterns. No significant cutting or filling is anticipated.

The Site is not located in an area susceptible to karstification and no known, active fault lines are located in the vicinity of the Site; therefore, no significant impacts associated with sinkhole development or seismic hazards have been identified. Additionally, no significant impacts to mineral resources are anticipated, as the proposed cemetery would not involve the commercial extraction of mineral resources, nor affect mineral resources considered important on a local, state, national, or global basis.

During development of the cemetery at the Site, less-than-significant, direct and indirect, short-term soil erosion and sedimentation (E&S) impacts could occur as existing buildings and infrastructure are demolished and removed and roads, grave sites, buildings, and other cemetery improvements are constructed. Cemetery construction activities would remove the current vegetative cover, disturb the soil surface, and compact the soil. The soil would then be susceptible to erosion by wind and surface runoff. Exposure of the soils during construction has the potential to result in increased offsite discharges of sediment-laden runoff due to the erosion susceptibility of the soils and slope of the Site. However, such potential adverse E&S effects would be minimized through utilization of appropriate BMPs as described in Section 4 and adherence to the terms of an approved OEPA Division of Surface Water (DSW) National Pollutant Discharge Elimination System (NPDES) Construction Activity - Stormwater Discharges Permit, including the development and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP), and the prevention of increased pre and post-construction sediment yield and flow velocity. Permit standards would be adhered to during all construction activities.

No long-term E&S impacts would be anticipated due to the nature of the Proposed Action. There would be limited impervious surfaces associated with the cemetery development and long-term soil erosion impacts would be managed by maintaining appropriately designed stormwater management features associated with the proposed cemetery.

The Proposed Action would irreversibly convert prime farmland soil into non-agricultural uses. As a result, the Proposed Action is subject to the FPPA requirements. VA would complete, in conjunction with the NRCS, a Farmland Conversion Impact Rating Form (Form AD-1006) for the Site. This process evaluates the relative value of the Site compared to other farmland in the locale. Based on the current use of the Site

as a golf course (non-farmland) and the abundant farmland in the surrounding area, the Proposed Action would have a negligible impact on farmland soils.

3.6.3 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to soils or geology by VA would occur. The Site would likely remain a golf course with no soils or geology impacts.

3.7 Hydrology and Water Quality

This section describes the affected environment, regulatory setting, and potential Proposed Action impacts for hydrology and water quality (surface water and groundwater). Wetlands, floodplains and coastal zones are discussed in Section 3.11.

The Federal Water Pollution Control Act, commonly referred to as the Clean Water Act (CWA), governs the control of water pollution in the U.S. The CWA authorizes the USEPA to regulate point sources that discharge pollutants into waters of the U.S. (WOTUS). USEPA has authorized OEPA DSW to implement the NPDES stormwater permitting program in Ohio.

Under section 303(d) of the CWA, states are required to develop and update, every two years, a list of waters that are impaired by one or more pollutants. Impaired waters are those that do not meet Water Quality Standards (WQSs) for their designated use. After identification as impaired, the state creates and prioritizes Total Maximum Daily Loads (TMDLs) to target and implement pollution reduction strategies and watershed plans to improve water quality. The OEPA DSW manages Ohio's TMDL program for the 303(d) listed waterbodies.

Section 438 of the Energy Independence and Security Act of 2007 (EISA) requires federal agencies to reduce stormwater runoff from federal development projects to protect water resources. Section 438 requires any development or redevelopment of a federal facility with a footprint exceeding 5,000 square feet to maintain or restore, to the extent technically feasible, the predevelopment hydrology of a property with regard to the temperature, rate, volume, and duration of flow.

3.7.1 Surface Waters

The Site is located in the Chippewa Creek subwatershed of the Tuscarawas River watershed. Two streams cross the site: Tommy Run flows from north to south in the approximate center of the Site and an unnamed tributary to Tommy Run crosses the northwest portion of the Site. The unnamed tributary connects with the main channel of Tommy Run approximately 2,000 feet southwest of the Site. Tommy Run flows to Chippewa Creek, located approximately two miles south of the Site, which flows to the Tuscarawas River and ultimately, the Ohio River. The approximate locations Tommy Run and its tributary at the Site are shown on the U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) Map (Figure 6).

Six ponds, totaling approximately 6-7 acres, are located at the Site. Three ponds are located in the central portion of the Site, one pond is located in the south-central portion of the Site, and two ponds are located in the extreme southern portion of the Site. Based on a review of historical topographic maps and aerial photographs, all six ponds are manmade and were constructed at various times between the late 1950s and early 2000s in association with the golf course. One of the ponds is located within the floodway of Tommy Run and appears to have been created by damming the stream. The pond locations are shown on Figure 6. The golf course uses the ponds for irrigation.

Tommy Run/Chippewa Creek are listed on the State of Ohio's 303(d) list of impaired water bodies for aquatic use, human health use, and recreational use. OEPA DSW established TMDLs for the Tuscarawas

River watershed, encompassing Tommy Run and Chippewa Creek, for total phosphorus, fecal coliform bacteria, and sedimentation.

Rawiga Golf Club currently operates a small wastewater treatment system at the Site to treat sanitary wastes from the golf course operations. The treatment system consists of two trash trap tanks, an 18,000-gallon per day capacity extended aeration packaged treatment plant, a dosing chamber, two sand filters, and an ultraviolet light disinfection chamber. Effluent from the disinfection chamber discharges to Tommy Run under an NPDES permit issued by OEPA. The permit authorizes discharges up to 18,000 gallons per day, although the actual discharge is reported to be much lower.

3.7.2 Groundwater

The Groundwater Atlas of the United States indicates the Site area is underlain by unconsolidated, coarse-grained deposits of Quaternary age that are at or near ground surface, which provide usable quantities groundwater.

The Site is not serviced by a municipal water system. Three water wells are currently located at the Site. One out-of-service (non-functional) hand-pump well is located in the north-central portion of the Site, one out-of-service irrigation well is located in the southwestern portion of the Site near the golf course pump house, and one active water supply well is located near the golf course pool house. The active water well is approximately 250 feet deep and draws water from the shale, sandy shale and sandstone bedrock, which reportedly occurs at approximately 52 feet bgs at the well location. Well logs for the irrigation and hand pump wells are not available. The Site is not located within an USEPA-designated sole source aquifer area, per the USEPA Sole Source Aquifers internet mapping application.

Groundwater was encountered in one the 13 geotechnical soil borings, at a depth of 14 feet bgs.

Rawiga Golf Club uses a Class V injection well permitted by the OEPA Division of Drinking and Ground Waters (DDGW) Underground Injection Control (UIC) Program. Based on available information, the Class V injection well is used for the discharge of drinking water treatment residuals, likely water softener regeneration wastewater and/or similar discharges associated with the golf course's potable water treatment system.

Figure 6 National Wetlands Inventory Map

3.7.3 Effects of the Proposed Action

VA's acquisition of the Site would result in no hydrology or water quality impacts. The current Site owners would continue to operate the golf course at the Site for at least 15 years. Golf course operations would

likely include the continued use of water collected within the on-site ponds for golf course irrigation, the continued use of the on-site water supply well for domestic use, the continued use of the on-site wastewater treatment system with a discharge to Tommy Run, and the continued use of a Class V injection well for the discharge of water treatment residuals. Rawiga Golf Club would maintain the required permits for these activities and fulfil the permit requirements, including required operational, monitoring, and reporting requirements. Consequently, surface water and groundwater impacts would be minor.

Golf course operations would also include the continued periodic application of fertilizers, pesticides, fungicides and herbicides to maintain the playing course. These materials would be appropriately stored and handled, and applied in accordance with manufacturer's recommendations and industry standards. These BMPs would minimize potential surface water and groundwater impacts associated with the use of these standard golf course chemicals.

Surface water impacts associated with the future cemetery expansion at the Site (associated with soil erosion and sedimentation) would be less than significant. The cemetery would be designed in concert with the natural topography and current drainage patterns. It is anticipated the cemetery design would include natural buffers of undeveloped land along Tommy Run, its tributary, and the on-site ponds, to the extent possible. However, if the cemetery design requires the removal of existing bridges or the installation of new culverts or bridges for cemetery roads crossing the streams, localized surface water impacts could occur. VA would implement BMPs described in Section 4 to control construction-related impacts of soil erosion and sedimentation and would provide onsite stormwater management consistent with the EISA Section 438 requirements following the development of the cemetery.

Based on the geotechnical investigation, groundwater is generally greater than 12 feet bgs at the Site and would not likely be encountered or adversely impacted during cemetery construction activities.

No significant long-term groundwater impacts are anticipated as a result of the Proposed Action. Based on standard modern burial practices, it is unlikely that toxic embalming fluid or other decomposition byproducts would be released into the soil and/or groundwater. The standard NCA design incorporates (for full casket burials) sub-surface concrete crypts, an entire section of which would be installed during site construction, above the water table. Using this technique, the caskets are not buried directly in the soil, but are rather set in a pre-placed concrete crypt (established turf and soil temporarily removed, crypt lid removed, casket placed, followed by the reverse process to complete). In addition, modern embalming fluids are markedly less toxic as the primary active ingredients are no longer arsenic based. Modern embalming fluids are commonly biodegradable. In addition, as selection of either cremains interment or columbaria placement increase, and green burials increase, the potential for soil or groundwater contamination commensurately decreases as no embalming fluids are used. Therefore, burial practices would have negligible impacts on groundwater resources.

NCA currently irrigates OWRNC using surface water that is collected in stormwater management ponds at the cemetery, which is supplemented as needed (infrequent) with groundwater from an irrigation well and/or municipal water provided by the City of Rittman. VA may use surface water from the existing Site ponds and/or an irrigation well for irrigation at the Site. Irrigation plans for the on-site portion of the cemetery would be determined during the cemetery design. NCA's modern cemetery development practices include the use of native grasses and low-moisture tolerant vegetation species, to the extent possible, thereby reducing the need for irrigation. Operation of the proposed cemetery would have a less-than-significant impact on water resources in the Site area.

Rawiga Golf Club currently has an NPDES permit to discharge effluent from the on-site wastewater treatment system to Tommy Run and a Class V injection well permit to discharge drinking water treatment residuals. It is anticipated that VA would not use either of these systems for the cemetery and would remove/properly abandon these systems, as well as any unneeded water wells, during the cemetery

expansion at the Site. VA will re-evaluate the use/need of these systems during the expanded cemetery design.

3.7.4 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to hydrology or water quality by VA would occur. The Site would likely remain a golf course with minor surface hydrology and water quality impacts.

3.8 Wildlife and Habitat

The Site has a rolling topography and generally slopes from the east and northwest to a valley in the central and southwestern portions of the Site that contains Tommy Run. The majority of the Site is developed with an 18-hole golf course with thin strips of deciduous and evergreen trees separating the fairways and greens, which consist of well-maintained turfgrass. Small areas with steeper slopes (located within the north central and southern portions of the Site) and the area along Tommy Run are mostly wooded with undergrowth vegetation. The Site also includes six manmade ponds and the golf course buildings (southwestern portion of the Site).

The areas surrounding the Site are predominantly occupied by agricultural fields with a few residences. The western portion of the current OWRNC property is developed with the cemetery; the central section of the property is wooded. Vegetative communities on the Site and surrounding area support wildlife species associated with rural southern Medina County and northern Wayne County.

3.8.1 Threatened and Endangered Species

As part of the preparation of this EA, the USFWS and Ohio natural resources agencies were contacted to identify the potential for the presence of state or federally listed species on or in the vicinity of the Site.

The USFWS Information for Planning and Conservation (IPaC) official species list generated for the Site identified one federally listed endangered species, two federally listed threatened species, and one federally listed candidate species for the vicinity of the Site. No critical habitats for protected species were identified on or adjacent to the Site. The IPaC report for the Site is provided in Appendix E. Table 3-1 provides a summary of the federally protected species listed in the IPaC report, their habitat requirements, and the potential presence of their required habitat at the Site.

Table 3-1 Federally Listed Species in the Vicinity of the Site

Species	Status	Habitat	Potential Habitat Present at the Site
Mammals			
Indiana Bat *Myotis sodalis*	Endangered	Restricted to underground hibernacula (caves and mines) in winter. In summer, roosts under exfoliating bark of dead trees that retain large, thick slabs of peeling bark. Roost trees are typically within canopy gaps in a forest, in a fence line, or along a wooded edge (USFWS 2007).	Yes, potential summer roosting habitat

Species	Status	Habitat	Potential Habitat Present at the Site
Northern Long-eared Bat *Myotis septentrionalis*	Threatened	Found in a variety of forested habitats. During summer, roost singly or in colonies underneath bark, in cavities, or in crevices of both live and dead trees. In winter, hibernates in caves and mines (USFWS).	Yes, potential summer roosting habitat
Insects			
Monarch Butterfly *Danaus plexippus*	Candidate	In summer, adults occur in a variety of habitats feeding on nectar of flowering plants. During breeding season, lay eggs on obligate milkweed host plants. Migrate to Mexico in fall to overwinter and return in late spring/early summer. (USFWS 2022).	Yes, potential summer habitat in open areas that are not mowed
Flowering Plants			
Eastern Prairie Fringed Orchid *Platanthera leucophaea*	Threatened	Mesic to wet prairies and wet sedge meadows. Peripheral habitat includes sedge-sphagnum bog mats around neutral pH kettle lakes, and fallow agricultural fields. Wet ditches and railroad rights-of-way also serve as refugia (NatureServe Explorer 2021).	No

In response to the NEPA scoping request, USFWS stated endangered Indiana bats and threatened northern long-eared bats occur throughout Ohio and may be found wherever suitable habitat occurs. Suitable summer habitats for these bats consist of a variety of forested/wooded habitats and suitable isolated trees within 1,000 feet of other forested/wooded habitat. USFWS recommended avoiding the removal of trees that are 3 or more inches of diameter at breast height (dbh), wherever possible. If trees greater than 3 inches dbh cannot be avoided, USFWS recommended their removal only between October 1 and March 31. USFWS stated if seasonal tree clearing is not possible, a summer presence/absence survey by an approved surveyor would be required to confirm protected bats are not present before tree clearing. USFWS stated that they do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat.

The Ohio Department of Natural Resources (ODNR) Division of Wildlife (DOW) protects Ohio's fish and wildlife, including threatened and endangered animal and plant species. Site-specific protected species information was not available from the ODNR DOW State Listed Wildlife and Plant Species database; however, the database identified 10 animal species and 1 plant species that may occur in Medina County and 13 animal species and 14 plant species that may occur in Wayne County, that are considered endangered or threatened by the State of Ohio.

ODNR DOW listed species for Medina County include five birds (northern harrier, loggerhead shrike, sandhill crane, least bittern, and barn owl), a damselfly (lilypad forktail), three mammals (Indiana bat, black bear, and northern long-eared bat), a fish (bigmouth shiner), and a plant (Bush's sedge).

ODNR DOW listed species for Wayne County include seven birds (American bittern, northern harrier, trumpeter swan, sandhill crane, least bittern, black-crowned night-heron, and barn owl), two mammals (Indiana bat and northern long-eared bat), two reptiles (smooth greensnake and Kirtland's snake), a

dragonfly (riffle snaketail), a fish (lake chubsucker), and fourteen plant species (mud sedge, scheuchzeria, vernal water-starwort, grass-pink, Sprengel's sedge, tawny cotton-grass, Leggett's pinweed, bunchflower, buckbean, lurking leskea, prairie fringed orchid, rose pogonia, marsh five-finger, and pitcher-plant).

The Site provides potential summer roosting habitat for the state-listed bat species and may provide habitat for some of the other state-protected species that may occur within Medina and/or Wayne Counties, although no known occurrences of state-listed species at the Site were identified.

Migratory Birds and Eagles

Certain birds are protected under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act. The IPaC report identified bald eagles have the potential to occur in the area of the Site. The IPaC report also identified the black-billed cuckoo, bobolink, red-headed woodpecker, and wood thrush as a migratory Birds of Conservation Concern protected under the MBTA that have the potential to occur at the Site during their breeding seasons.

3.8.2 Effects of the Proposed Action

VA's acquisition of the Site and the initial continued use of the Site as a golf course would result in no wildlife and habitat impacts. No tree clearing or wildlife habitat alteration is anticipated with the continued golf course operation.

Future cemetery development would include clearing some of the existing Site trees and other Site vegetation and could result in direct and indirect, short-term and long-term impacts to wildlife at the Site. Habitat associated with common wildlife at the Site would be impacted from the permanent conversion of Site land into the cemetery grounds. However, much of the Site is highly-maintained turf grass associated with the golf course, which provides very limited wildlife habitat. It is anticipated that the steeply sloping wooded areas and the wooded/natural vegetation areas along Tommy Run and the Site ponds, which provide higher quality wildlife habitat, would remain mostly undisturbed by the cemetery development.

Wooded area/trees at the Site provide potential summer roosting habitat for federally protected Indiana and northern long-eared bats. The Site may also provide suitable habitat for state-listed protected species and migratory birds. Concurrent with the future cemetery expansion design, VA would re-evaluate the potential for protected species at the Site, including coordination with the USFWS and ODNR, and the completion of pre-development biological surveys, as necessary. VA anticipates that through environmentally sensitive site design, potential impacts to protected species would be minimized or avoided. Protected wildlife and habitat would be avoided to the extent possible, with undeveloped buffers. It is anticipated that VA would conduct seasonal tree clearing, between October 1 and March 31, to avoid impacts to protected bats. If seasonal tree clearing is not possible, a summer presence/absence survey by an approved surveyor would be conducted to confirm protected bats are not present before tree clearing. VA would consult with USFWS to develop and implement appropriate measures to minimize potential impacts to protected species.

With the implementation of these management and avoidance measures, wildlife and habitat impacts associated with the Proposed Action would be less than significant.

3.8.3 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to vegetation or wildlife habitat by VA would occur. The Site would likely remain a golf course with no biological resource impacts.

3.9 Noise

The existing noise environment at and around the Site is relatively quiet with minor noise associated with vehicle traffic on Rawiga Road, located along the western Site boundary. In addition, ceremonial rifle

salutes associated with Veteran interments at OWRNC are audible at the Site and surrounding area. The short bursts of noise from the salutes are intermittent and only occur during weekday business hours, approximately 5 to 10 times per day. No other notable noise-generating sources are present in the immediate vicinity of the Site. The overall noise environment can be characterized as that typical of a partially developed, mostly rural area and are consistent with a cemetery setting.

3.9.1 Sensitive Receptors

Sensitive noise receptors in the immediate vicinity of the Site include three residences located approximately 300 to 500 feet to the north, three residences located approximately 200 to 400 feet to the south, and two residences located approximately 100 to 300 feet to the west of the Site. Additional residences are located approximately 800 feet or more to the north, south and west of the Site. The existing OWRNC is also a sensitive noise receptor. No other sensitive noise receptors, such as schools, daycare facilities, libraries, parks or designated natural areas are located within 0.50-mile of the Site.

3.9.2 Effects of the Proposed Action

VA's acquisition of the Site and the initial continued use of the Site as a golf course would result in no noise impacts. The golf course is a mostly quite recreational facility.

The future cemetery expansion at the Site would have short-term adverse impacts to the existing noise environment during the construction activities. Noise generating sources during construction activities would be associated primarily with standard construction equipment and construction equipment transportation. These increased noise levels could directly affect the neighboring areas.

Construction activities generate noise by their very nature and are highly variable, depending on the type, number, and operating schedules of equipment. Construction projects are usually executed in stages, each having its own combination of equipment and noise characteristics and magnitudes. Construction activities are expected to be typical of other similar construction projects and would include mobilization, site preparation, excavation, placing foundations, pre-placed crypt installation, utility development, heavy equipment movement, and paving roadways and parking areas.

The most prevalent noise source at typical construction sites is the internal combustion engine. General construction equipment using internal combustion engines includes, but is not limited to: heavy, medium, and light equipment such as excavators; roller compactors; front-end loaders; bulldozers; graders; backhoes; dump trucks; water trucks; concrete trucks; pump trucks; utility trucks; and lube, oil, and fuel trucks.

Peak noise levels vary at a given location based on line of sight, topography, vegetation, and atmospheric conditions. In addition, peak noise levels would be variable and intermittent because each piece of equipment would only be operated when needed. However, peak construction noise levels would be considerably higher than existing noise levels. Relatively high peak noise levels in the range of 93 to 108 dBA (decibels, A-weighted scale) would occur on the active construction site, decreasing with distance from the construction areas. Table 3-2 presents peak noise levels that could be expected from a range of construction equipment during proposed construction activities.

Generally speaking, peak noise levels within 50 feet of active construction areas and material transportation routes would most likely be considered "striking" or "very loud", comparable to peak crowd noise at an indoor sports arena. At approximately 200 feet, peak noise levels would be loud and approximately comparable to a garbage disposal or vacuum cleaner at 10 feet. At 0.25-mile, construction noise levels would generally be quiet enough so as to be considered insignificant, although transient noise levels may be noticeable at times.

Combined peak noise levels, or worst-case noise levels when several loud pieces of equipment are used in a small area at the same time as described in Table 3-2, are expected to occur rarely, if ever, during the project. However, under these circumstances, peak noise levels could exceed 90 dBA within 200 feet of the construction area, depending on equipment being used.

Table 3-2 Peak Noise Levels Expected from Typical Construction Equipment

Source	Peak Noise Level (dBA, attenuated)							
	Distance from Source (feet)							
	0	**50**	**100**	**200**	**400**	**1,000**	**1,700**	**2,500**
Heavy truck	95	84-89	78-93	72-77	66-71	58-63	54-59	50-55
Dump truck	108	88	82	76	70	62	58	54
Concrete mixer	108	85	79	73	67	59	55	51
Jack-hammer	108	88	82	76	70	62	58	54
Scraper	93	80-89	74-82	68-77	60-71	54-63	50-59	46-55
Bulldozer	107	87-102	81-96	75-90	69-84	61-76	57-72	53-68
Generator	96	76	70	64	58	50	46	42
Crane	104	75-88	69-82	63-76	55-70	49-62	45-48	41-54
Loader	104	73-86	67-80	61-74	55-68	47-60	43-56	39-52
Grader	108	88-91	82-85	76-79	70-73	62-65	58-61	54-57
Pile driver	105	95	89	83	77	69	65	61
Forklift	100	95	89	83	77	69	65	61
Combined Peak Noise Level (Bulldozer, Jackhammer, Scraper)								
Combined Peak Noise Level	**Distance from Source**							
	50 feet	**100 feet**	**200 feet**	**¼ mile**	**½ mile**			
	103	97	91	74	68			
Source: (Tipler 1976)								

Although noise levels would be quite loud in the immediate area, the intermittent nature of peak construction noise levels would not create the steady noise level conditions for an extended duration that could lead to hearing damage. Construction workers would follow standard Federal Occupational Safety and Health Administration requirements to prevent hearing damage.

Areas that could be most affected by noise from construction include those closest to the construction footprint, including nearby residences. Indoor noise levels would be expected to be 15-25 decibels lower than outdoor levels. In addition, construction noise impacts would be temporary and would be minimized through BMPs outlined in Section 4.

Indirect impacts include noise from workers commuting and material transport. Area traffic volumes and noise levels would increase slightly as construction employees commute to and from work at the project area, and delivery and service vehicles (including trucks of various sizes) transit to and from the Site. Because trucks are present during most phases of construction and leave and enter the Site via local thoroughfares, truck noises tend to impact more people over a wider area. For this Proposed Action, persons in the area near the Site would experience temporary increases in traffic noise during day-time hours. These effects are not considered significant because they would be temporary and similar to existing traffic noise levels in the area.

Future cemetery operational activities at the Site would be similar to the current OWRNC operations and would include vehicle traffic to and from the Site; the use of powered equipment for grave site preparation, maintenance, and upkeep; and periodic (during weekday, day-time hours) ceremonial rifle discharges from committal shelters (if committal shelters are constructed at the Site). Estimated ceremonial rifle salute noise levels at varying distances based on U.S. Army estimates are provided in Table 3-3. The expanded cemetery operational activities would not produce excessive noise and would not produce a significant adverse noise impact on surrounding land uses. The facility would be a relatively quiet cemetery, consistent with the existing OWRNC.

Table 3-3 Estimated M-16 Rifle Blank Noise Levels at Varying Distances

Distance (meters)	A-Weighted Exposure Level (dBA)	A-Weighted Maximum Level (dBA)
50	67	76
100	61	70
200	54	63
400	40	49
800	32	41
1,600	22	31

3.9.3 Effects of the No Action Alternative

Under the No Action Alternative, the noise environment surrounding the Site would not be altered by activities of VA. The Site would likely remain a golf course, a mostly quiet recreational facility.

3.10 Land Use

The Site is currently occupied by an 18-hole golf course (Rawiga Golf Club), consisting of mostly grassy fairways and greens separated by strips of woods. The Site also includes six manmade ponds, one picnic pavilion and three shelters, a covered bridge, golf cart pathways, and 11 buildings. Tommy Run flows north-south across the central portion of the Site. The majority of the Site (150 acres) is located in Medina County (Guilford Township) and the small southern portion of the Site (6 acres) is located in Wayne County (Milton Township).

The current OWRNC property is located north and northeast of the Site and contains the developed cemetery (west), wooded undeveloped land near Tommy Run (central), and unimproved agricultural land

(east). The area east of the Site is agricultural land. The areas south and west (beyond Rawiga Road) of the Site are primarily unimproved agricultural land with low-density, scattered residential development.

The Guilford Township Board of Trustees Zoning Map indicates the majority of the Site is currently zoned R (residential). The Guilford Township Zoning Resolution indicates golf courses and cemeteries are both conditionally permitted uses in R Zoning Districts. Adjoining areas to the west of the Site are also zoned residential. The areas adjoining to the north and northeast (OWRNC) and east of the Site are located within the jurisdiction of the City of Rittman and are currently zoned Residential Estate. The small southern portion of the Site and southerly adjoining area are not zoned; Milton Township does not have zoning designation/ordinances. Current Site and surrounding area zoning is shown on Figure 7.

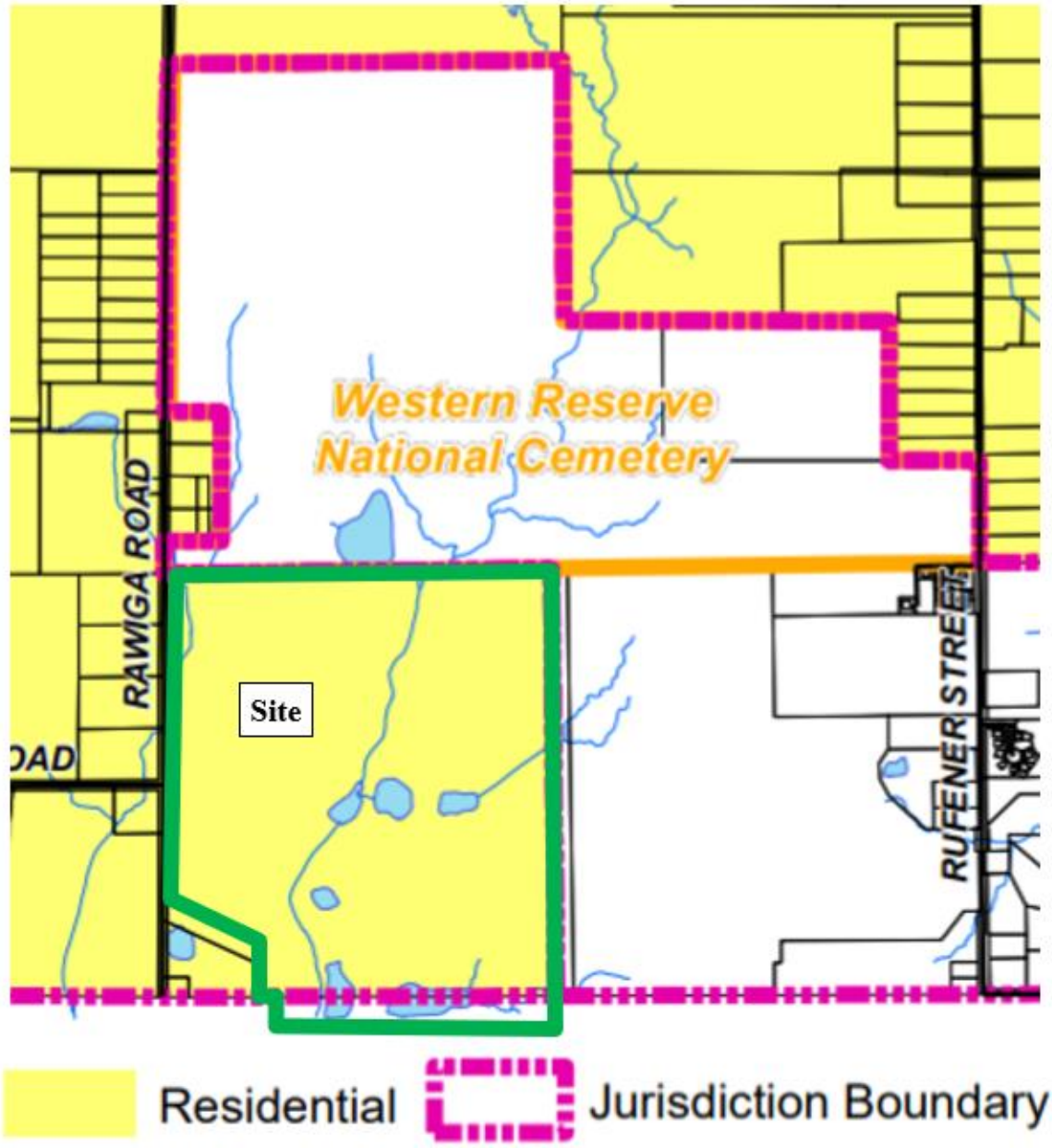

Figure 7 Guilford Township Zoning Map

3.10.1 Effects of the Proposed Action

VA's acquisition of the Site and the initial continued use of the Site as a golf course would result in no land use impacts.

The future cemetery expansion would have less-than-significant, long-term land use effects. The Site would be transformed from a golf course to a portion of a national cemetery. However, the proposed cemetery development would be consistent with the adjacent, existing OWRNC development, consistent with the low impact development of the aera, and compatible with the surrounding land uses.

As a federal agency, VA is not subject to local zoning regulations; however, the future cemetery development would be generally consistent with local zoning.

3.10.2 Effects of the No Action Alternative

Under the No Action Alternative, no land use impacts due to VA's Proposed Action would occur. The Site would likely remain a golf course with no land use impacts.

3.11 Wetlands, Floodplains, and Coastal Zone Management

3.11.1 Wetlands

This section discusses wetlands at or near the Site and surface waters (streams) as they pertain to wetlands. Additional information regarding surface waters is provided in Section 3.7.

The USFWS National Wetlands Inventory (NWI) map for the Site area (Figure 6) identifies six freshwater ponds on the Site, and Tommy Run and the unnamed tributary to Tommy Run as riverine areas. The NWI map did not identify any other wetlands or surface waters on the Site.

TTL completed a wetlands survey of the Site in July 2021. The wetlands survey identified Tommy Run, the unnamed tributary to Tommy Run, six manmade ponds, two ephemeral streams, and two small wetlands at the Site. All of these wetlands and surface water features discharge directly to Tommy Run or appear to be hydrologically connected to Tommy Run, which is considered a jurisdictional water of the United States (WOTUS), protected under Section 404 of the Clean Water Act. Consequently, all of the identified wetlands and surface waters would likely be considered WOTUS, based on current regulations. The wetlands and WOTUS identified at the Site (shown on Figure 8) include:

- Tommy Run – a north to south flowing stream in the central portion of the Site. Approximately 3,150 feet long and 6 to 15 feet wide.
- Unnamed Tributary to Tommy Run – a north to south flowing intermittent stream in the northwestern portion of the Site. Approximately 1,000 feet long and 2 to 6 feet wide.
- Pond 1 – an approximately 24,800 square feet pond in the central portion of the Site, located within the Tommy Run floodway. Appears to have been constructed by damming the stream.
- Pond 2 – an approximately 48,240 square feet pond in the central portion of the Site.
- Pond 3 – an approximately 33,375 square feet pond in the central portion of the Site.
- Pond 4 – an approximately 50,020 square feet pond in the south-central portion of the Site.
- Pond 5 – an approximately 41,190 square feet pond in the southern portion of the Site.
- Pond 6 – an approximately 19,100 square feet pond in the southern portion of the Site.

- Northern Ephemeral Stream – located in the northern portion of the Site, west of Tommy Run. Discharges to Tommy Run via a culvert. Approximately 265 feet long and 1 to 2 feet wide.
- Southeastern Ephemeral Stream – located in the southeastern portion of the Site, north of Pond 5. Discharges to Pond 5. Approximately 390 feet long and 1 to 3 feet wide.
- SP 2 Area Wetland – an approximately 3,375 square feet depressional wetland located near the northern site border.
- SP 3 Area Wetland – an approximately 1,060 square feet low area in the southeastern portion of the site near the ephemeral stream.

Figure 8 Wetlands Survey Map

3.11.2 Floodplains

Available Federal Emergency Management Agency (FEMA) floodplain mapping (FIRM Map Numbers 39103C0405E (eastern portion of Site), Medina County, dated August 19, 2013, 39103C0410D (western portion of Site), Medina County, dated August 4, 2008, and 39169C0106E, Wayne County, dated August 18, 2009) indicated that the central portion of the Site contains a floodway associated with Tommy Run (Figure 9). Areas along the floodway are located within the 100-year or 500-year floodplain. Away from Tommy Run, the Site is outside of the 100-year and 500-year floodplain (Zone X).

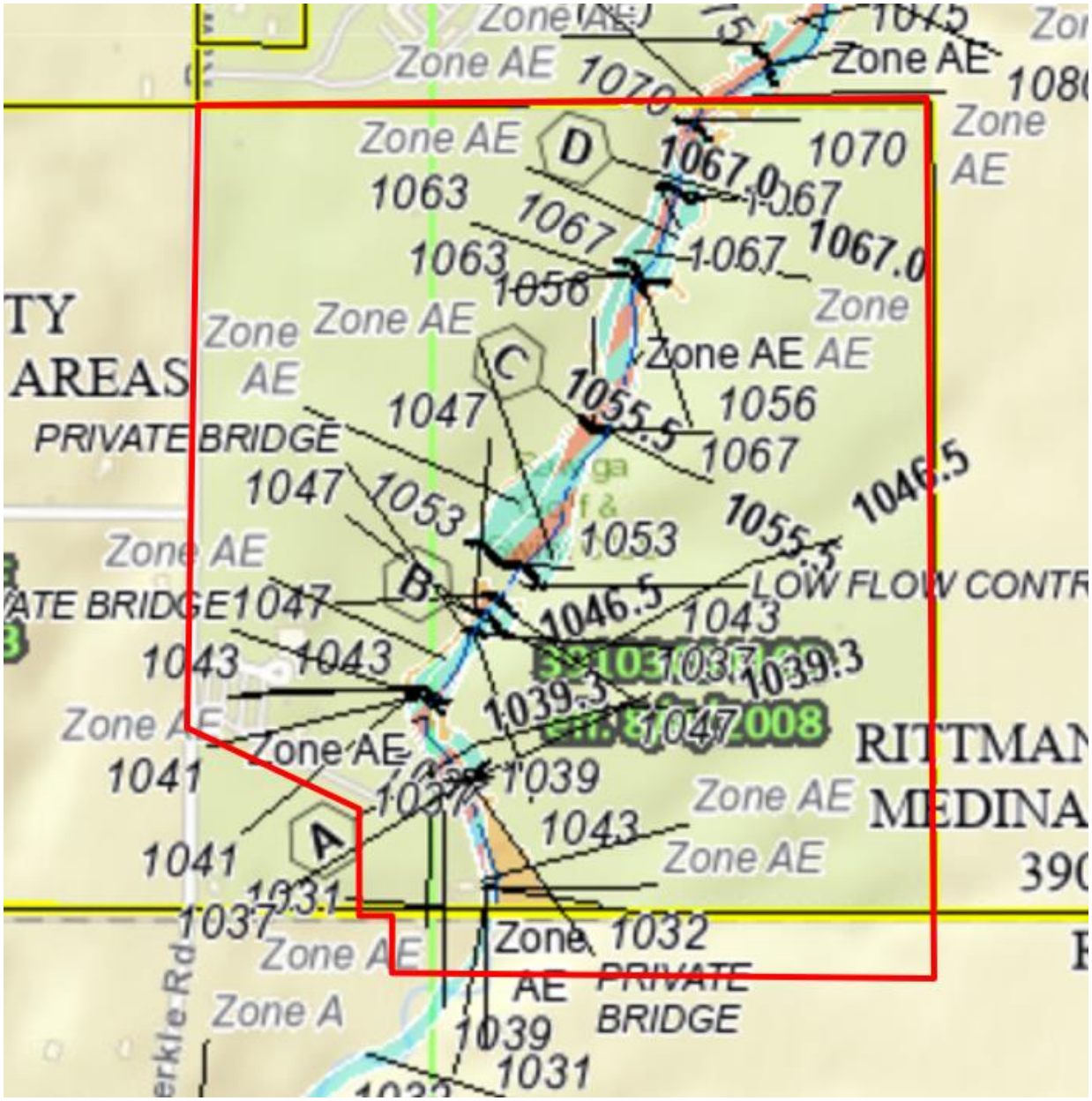

Figure 9 Floodplain Map

3.11.3 Coastal Zone

The Coastal Zone Management Act (CZMA) was promulgated to control nonpoint pollution sources that affect coastal water quality. The CZMA encourages states to preserve, protect, develop, and where possible, restore or enhance valuable natural coastal resources such as wetlands, floodplains, estuaries, beaches, dunes, barrier islands, and coral reefs, as well as the fish and wildlife using those habitats. The CZMA requires that federal actions within and outside the coastal zone that could have reasonably foreseeable impacts on land, water, and natural resources of the coastal zone be consistent with the state's federally approved Coastal Management Program (CMP). Ohio's designated coastal zone is limited to the area along Lake Erie. The Site is not located with the coastal management zone.

3.11.4 Effects of the Proposed Action

VA's acquisition of the Site and the initial continued use of the Site as a golf course would not result in impacts to wetlands, floodplains or coastal zones.

The future cemetery development could result in short-term and long-term adverse impacts to regulated wetlands, as wetlands and other regulated WOTUS are located at the Site. The cemetery design would avoid and maintain buffers of undisturbed land around the identified wetlands and streams to the extent possible. However, if the cemetery design requires filling a wetland and/or stream area, localized wetland/stream impacts would occur. VA would obtain all necessary permits and approvals from the U.S. Army Corps of Engineers (USACE) and OEPA, including the implementation of wetland mitigation measures, if required. Wetland impacts would be less than significant.

The future cemetery development would have less-than-significant impacts on floodplains. The cemetery would be designed to avoid construction within the floodway and 100-year floodplain of Tommy Run. Minor floodplain impacts could occur if a bridge is constructed over Tommy Run. However, VA would compensate for any construction within the floodplain during the site design. VA would manage stormwater at the cemetery so not to affect the hydrology of off-site properties.

The cemetery expansion would not impact a coastal zone.

3.11.5 Effects of the No Action Alternative

The No Action Alternative would result in no wetlands, floodplains, or coastal zones impacts.

3.12 Socioeconomics

The following subsections identify and describe the socioeconomic environment of Medina County, Wayne County, and the State of Ohio. Presented data provide an understanding of the socioeconomic factors that have developed the Site area. Socioeconomic areas of discussion include the local demographics of the area, regional and local economy, and local housing. Data used in preparing this section were collected from the 2020 Census of Population and Housing, subsequent US Census Bureau data, and the US Department of Commerce Bureau of Economic Analysis.

3.12.1 Demographics

Medina County's estimated population in 2021 was 183,092 residents. Wayne County's estimated population in 2021 was 116,710 residents. The estimated population total for the State of Ohio in 2021 was 11,780,017 residents (Table 3-4). Age distributions are generally similar for Medina County, Wayne County, and the State of Ohio. High school graduation rates are higher for Medina County than that of Wayne County and the State of Ohio as a whole. Minority populations for Medina County and Wayne County are much lower than that of the State of Ohio. Minority population rates specific to the Site area are discussed in Section 3.17 (Environmental Justice).

Table 3-4 Demographic Data for Medina County, Wayne County, and Ohio

Area	All Individuals (2021 Estimate)	Population Under 18 Age Years (2021 Estimate)	Population Over 65 Age Years (2021 Estimate)	Minority (2021 Estimate)	High School Graduates (2021 Estimate)	Veterans (2020 Estimate)
Medina County	183,092	21.7%	19.1%	4.8%	94.7%	10,298
Wayne County	116,710	24.2%	18.7%	4.7%	86.8%	5,965
Ohio	11,780,017	22.1%	17.8%	18.8%	90.8%	685,905

Source: US Census Bureau, 2020 Census; American Community Survey, Profile of General Demographic Characteristics, 2016-2020 (US Census Bureau 2022).

3.12.2 Income

Medina County has a higher median household income and lower population below the poverty line than Wayne County, which has a slightly higher median household income and lower population below the poverty line than the State of Ohio as a whole (Table 3-5). Household incomes specific to the Site area are discussed in Section 3.17. Unemployment rates for Medina County, Wayne County, and the State of Ohio were all very low in April 2022.

Table 3-5 Regional Income for Medina County, Wayne County, and Ohio

Area	Number of Households	Median Household Income	Population Below Poverty Level	Unemployment Rate
Medina County	69,739	$ 77,784	5.9%	4.2% (April 2022)
Wayne County	43,238	$ 61,424	9.0%	2.5% (April 2022)
Ohio	4,717,226	$ 58,1162	12.6%	3.6% (April 2022)

Source: US Census Bureau, 2020 Census; American Community Survey, Profile of General Demographic Characteristics, 2016-2020. (U.S. Census Bureau 2022) and U.S. Bureau of Labor Statistics, Unemployment rate in States and Local Areas (U.S. Bureau of Labor Statistics 2022).

3.12.3 Commuting Patterns

Residents of Medina County and Wayne County are largely dependent on personal automobiles for transportation to and from work. Public transportation is not currently available in the Site area. The average commuting time in Medina County and Wayne County was approximately 20 to 27 minutes in 2020.

3.12.4 Protection of Children

Because children may suffer disproportionately from environmental health risks and safety risks, EO 13045, *Protection of Children From Environmental Health Risks and Safety Risks*, was introduced in 1997 to prioritize the identification and assessment of environmental health risks and safety risks that may affect children and to ensure that federal agencies' policies, programs, activities, and standards address environmental risks and safety risks to children. This section identifies the distribution of children and locations where numbers of children may be proportionately high (for example, schools, childcare centers, and family housing) in areas potentially affected by the Proposed Action.

Older children are present at the Site as patrons of the golf course. The Site swimming pool, which attracted more and younger children, was permanently closed in late 2021. Children may be present in the residences

located north, south, and west of the Site. No schools or childcare centers are located within 0.50-mile of the Site.

3.12.5 Effects of the Proposed Action

VA's acquisition of the Site and the initial continued use of the Site as a golf course would have little socioeconomic impact on the local community.

The proposed future cemetery development at the Site is anticipated to result in minor short-term, beneficial socioeconomic impacts to local employment and personal income by providing temporary construction jobs. However, due to the short-term, finite nature of this construction project, no long-term impacts to the construction labor force are anticipated.

The future cemetery expansion on the Site would also result in minor short-term and long-term, adverse socioeconomic impacts by eliminating the golf course, which provides seasonal employment and recreational facilities to the local area. However, given the relatively low number of jobs provided by the golf course and the availability of other golf courses in the local area, these impacts would be minor.

The Proposed Action would result in long-term significant beneficial socioeconomic impacts by providing NCA additional land to continue providing National Cemetery burial benefits to regional Veterans and their families once the existing OWRNC reaches its burial capacity.

No adverse health or safety risks to children are anticipated to result from expansion of the cemetery at the Site. Children would only be present at the cemetery as visitors. Construction areas would be secured to prevent unauthorized access by children from nearby areas. The construction contractor would limit and control construction dust and noise as discussed in Section 4, thereby minimizing adverse effects to children in the area.

3.12.6 Effects of the No Action Alternative

Under the No Action Alternative, the Site would likely continue to be a used as a golf course, with no socioeconomic change to the Site area. No short-term or long-term socioeconomic impacts to the Site area due to VA's action would occur.

Most importantly, the No Action Alternative would not enable NCA to continue to provide regional burial sites commensurate with the long-term need for these services once the OWRNC reaches its capacity, resulting in a potential significant adverse, long-term, impact to U.S. Veterans and their families. U.S. Veterans and their families residing in north-central Ohio would have to travel much longer distances to the nearest National or State Veterans Cemetery for interment and subsequent visits, at increased cost and time. In addition, interment in a distance cemetery would reduce the ability for subsequent visits by Veteran families.

3.13 Community Services

The Site is located within the Cloverleaf Local School District. Cloverleaf Elementary School, Cloverleaf Middle School, and Cloverleaf High School are located approximately eight miles northwest of the Site. Rittman High School and Rittman Elementary School are located approximately one mile southeast of the Site. There are no other schools located within one mile of the Site.

The Seville Police Department provides police protection to the Site and the Seville-Guilford Fire Department provides fire protection and emergency medical services to the Site. The OWRNC is currently serviced by the City of Rittman Police and Fire Departments.

The Medina County Highway Department, Wayne County Engineer, and Ohio Department of Transportation (ODOT) provide local road and bridge maintenance services in the Site vicinity.

There are no hospitals or other major medical facilities located within one mile of the Site. The nearest hospital is the Summa-Wadsworth-Rittman/Akron General Hospital located approximately 3.5 miles northeast of the Site.

Public transportation is not currently provided to the Site vicinity.

There are no public parks or developed public recreational facilities within one mile of the Site.

3.13.1 Effects of the Proposed Action

VA's acquisition of the Site and the initial continued use of the Site as a golf course would not result in impacts to community services.

The future expansion of the cemetery on the Site would have minimal community service impacts. No significant additional load is expected to be placed on the local fire or police departments as the result of the Proposed Action. Use of other public or community services as a result of the proposed cemetery expansion would be minor and consistent with the existing OWRNC. The Proposed Action is expected to have a negligible impact on local public services.

3.13.2 Effects of the No Action Alternative

Under the No Action Alternative, the Site would likely remain a golf course with no community services impacts.

3.14 Solid Waste and Hazardous Materials

Hazardous and toxic materials or substances are generally defined as materials or substances that pose a risk (through either physical or chemical reactions) to human health or the environment.

TTL conducted a Phase I Environmental Site Assessment (Phase I ESA) of the Site on behalf of VA in 2021. The Phase I ESA included a site visit, interviews with persons knowledgeable about the Site, a review of historic information, and review of local, state, and federal regulatory information for the Site and surrounding area. From at least 1873 to the late 1950s, the southwestern portion of the Site was occupied by a residence with associated agricultural buildings. The remaining portions consisted of agricultural land, wooded land, and streams. The Site was developed as a golf course in the late 1950s.

The Phase I ESA identified suspect environmental conditions associated with the Site, including the following:

- The long-term use (over 50 years) of the golf course maintenance area for storage and handling of hazardous materials and petroleum products associated with repair and maintenance of golf course equipment and lawn mowers.
- The long-term use (over 50 years) of the golf course pump house and maintenance areas for storage and mixing of pesticides, fungicides, and/or fertilizers associated with routine groundskeeping.
- The long-term use (estimated at least 20 years) of aboveground storage tanks (ASTs) for petroleum storage and dispensing at the golf course.

The Phase I ESA recommended sampling the golf course maintenance, pump house and AST areas before termination of the golf course lease to verify no releases have occurred. Any impacts identified during the future sampling must be managed in accordance with federal and State of Ohio regulations.

3.14.1 Effects of the Proposed Action

VA's acquisition of the Site would not result in solid waste and hazardous materials impacts. Golf course operation and maintenance activities, including the storage and handling of petroleum products and hazardous materials, would continue at the Site. Rawiga Golf Club would comply with applicable regulations and implement BMPs to minimize the potential release of these substances. Prior to the termination of the golf course lease, sampling would be conducted in the areas of petroleum product and hazardous materials storage and handling to confirm that no releases have occurred. Any contamination that is identified would be remediated and/or managed, as required, to prevent unacceptable human and ecological exposures. Cemetery construction contractors would be informed of known/suspect residual contamination, if any, in these areas to ensure any excavated soil is properly handled. With these management measures, potential adverse solid waste and hazardous materials impacts associated with the golf course's past and continued operation would be less than significant.

The southwestern portion of the Site contains several buildings and sheds that are used for the golf course operations. It is anticipated that these buildings, which may contain asbestos-containing building materials (ACM), would be demolished in the future for the cemetery development. An asbestos survey of the Site buildings would be conducted by an Ohio-licensed inspector prior to building demolition. Identified ACMs would be removed and properly disposed of by licensed asbestos abatement contractors in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) and State of Ohio requirements prior to demolition. Asbestos abatement procedures require the removal of ACM with various controls and monitoring to prevent asbestos emissions and worker exposure.

The future cemetery development could result in short-term impacts due to the increased presence and use of petroleum products and hazardous materials during construction of the cemetery. In addition, an increase in construction vehicle traffic would increase the possibility of a release of vehicle operating fluids (such as oil, diesel, gasoline, and antifreeze) and maintenance materials. As such, a minor, short-term adverse impact is possible. Implementation of standard construction BMPs (Section 4) would serve to ensure this impact is further minimized.

Future cemetery operations would include the storage and use of petroleum products and hazardous materials (such as diesel, oil, and gasoline) for the cemetery excavators and landscape maintenance equipment. The cemetery expansion may include the development of a new cemetery maintenance area at the Site. In addition, following cemetery development, lawn fertilizers and lawn maintenance chemicals would be used in areas with turf grass. These chemicals would be stored, handled, and used in accordance with NCA policies and manufacturer application recommendations. No significant adverse long-term impacts during operation of the cemetery are anticipated; long-term operational solid wastes and hazardous materials would be managed in accordance with applicable federal and state laws and NCA procedures.

The development and operation of the expanded cemetery would not result in a substantial increase in the generation of solid or hazardous substances or wastes, increase the exposure of persons to hazardous or toxic substances, increase the presence of hazardous or toxic materials in the environment, or place substantial restrictions on property use due to hazardous waste, materials, or site remediation. As noted in Section 3.7.3, based on standard modern burial practices and VA's cemetery design guidance, it is unlikely that embalming fluid would be released into the soil or groundwater.

3.14.2 Effects of the No Action Alternative

Under the No Action Alternative, no development or change to the Site by VA would occur. The Site would likely remain a golf course. Golf course operation and maintenance activities, including the storage and handling of petroleum products and hazardous materials, would continue at the Site. Potential adverse solid waste and hazardous materials impacts associated with the golf course's continued operation would be less than significant.

3.15 Traffic, Transportation, and Parking

Traffic in the Site area is regulated by the Medina County Highway Department, Wayne County Engineer, and ODOT.

Access to the Site is currently provided by two driveways from Rawiga Road (County Road 133) located in the southwestern portion of the Site. Rawiga Road is a two-lane, asphalt-paved, north-south road. There are no dedicated turn lanes or traffic signals at the entrance drives to the golf course. The golf course is estimated to generate approximately 200 one-way vehicle trips per day (100 daily vehicles) during the peak golfing season.

The main OWRNC cemetery entrance is located on Rawiga Road, approximately one-half mile north of the Site. The service/maintenance entrance to the cemetery is located on Rawiga Road, just north of the Site. There are no dedicated turn lanes or traffic signals at the entrance drives to the cemetery. Approximately 10 interments occur per each weekday at OWRNC, with approximately 10 to 20 vehicles for each burial service. Burial services are scheduled throughout the day and typically do not coincide with peak morning and evening travel times. Traffic impacts associated with the funeral processions are minor, intermittent, and of short duration.

Vehicle traffic along Rawiga Road in the vicinity of the Site is typically associated with the cemetery, the golf course, and personal travel by area residents. A 2020 traffic count for Rawiga Road in the vicinity of the Site returned an average daily traffic volume (24 hours, both directions) of 463 vehicles. All of the roadways used to access the Site and the current OWRNC are estimated to operate at a Level of Service[1] (LOS) rating of C or better. Local roadway characteristics are shown in Table 3-6.

Table 3-6 Area Roadways

Type	Route	Direction	Road Width (feet)	Lanes	Average Daily Traffic (vehicles)	Estimated Level of Service
County Road	Rawiga Road (CR 133)	North-South	20	2	463 (2020)	C or better
Traffic Volume Data: MORPC, 2020 Other Data Source: TTL Site Reconnaissance, July 2021						

3.15.1 Effects of the Proposed Action

VA's acquisition of the Site would not result in transportation or parking impacts. The initial continued use of the Site as a golf course is not anticipated to result in any change in traffic volume from current levels or any additional transportation impacts.

Construction traffic associated with the future cemetery expansion, consisting of trucks, workers' personal vehicles, and construction equipment, would temporarily increase traffic volumes in the local area, but would not likely cause long delays. It is expected that the current golf course driveways would be used by construction traffic to prevent disruption of cemetery operations. Only minor, future short-term adverse transportation impacts are anticipated.

It is anticipated that the expanded cemetery at the Site would be accessed via the current main OWRNC entrance from Rawiga Road through a new internal cemetery loop road that extends to the Site. One of the

[1] **Level of Service** – LOS represents a set of qualitative descriptions of a transportation system's performance. The Federal Highway Administration Highway Capacity Manual defines levels of service for intersections and highway segments, with ratings that range from A (best) to F (worst). Generally, a LOS of D or higher is considered acceptable by transportation planning agencies.

existing Site driveways may be used for cemetery maintenance traffic. No modifications to Rawiga Road or the overall cemetery traffic patterns are anticipated with the cemetery expansion.

The future cemetery expansion at the Site would increase the burial capacity and, consequently, the length of time (years) that interments are conducted at the cemetery, but would not increase the rate of burials, burial vehicle trips, or burial parking demand. VA anticipates the burial rate at the expanded cemetery will remain approximately 10 interments per each weekday, with approximately 10 to 20 vehicles for each burial service. As the cemetery is enlarged and the total number of interments increases, the number of cemetery visitors would increase. However, the increased cemetery visitor traffic would likely be offset by the reduction of traffic from the closure of the golf course. Consequently, the future cemetery expansion would have only minor traffic impacts.

No parking impacts are anticipated. The expanded cemetery would be designed and constructed to accommodate all cemetery parking within the cemetery grounds.

3.15.2 Effects of the No Action Alternative

Under the No Action Alternative, the Site would remain a golf course with similar traffic volumes and no additional traffic or parking impacts.

3.16 Utilities

The Site area is serviced by electric (First Energy Electric), natural gas (Columbia Gas), and telecommunication utilities, with service lines for each located along Rawiga Road. The OWRNC and Site are connected to these utilities.

Municipal water service is not provided to the Site. The golf course uses a water supply well located near the pool house for potable water. The water supply well and associated treatment system are permitted by the OEPA DDGW as a public water system. The golf course also has an irrigation well, located in the golf course maintenance area; however, the well reportedly does not have sufficient capacity to meet the golf course irrigation needs and is no longer used. The golf course uses water that collects in the on-site ponds for irrigation.

The OWRNC Administration and Maintenance Complex and Public Information Center Buildings are connected to the City of Rittman's potable water system. OWRNC uses stormwater collected in on-cemetery stormwater management ponds for cemetery irrigation. OWRNC has an irrigation well that can be used to refill the irrigation ponds, and also can refill the irrigation ponds with potable water from the City of Rittman; however, the cemetery does not need to refill the ponds very often given the climate of the area.

Rawiga Golf Club currently operates a small wastewater treatment system at the Site to treat sanitary wastes from the golf course operations. Effluent from the disinfection chamber discharges to Tommy Run under an NPDES permit issued by OEPA. The permit authorizes discharges up to 18,000 gallons per day, although the actual discharge is reported to be much lower. OWRNC uses septic systems for the treatment and its sanitary wastes.

3.16.1 Effects of the Proposed Action

VA's acquisition of the Site would result in no utility impacts. Rawiga Golf Club would continue to operate the golf course at the Site for at least 15 years and would likely continue to use the existing Site utilities, including the on-site water supply well/treatment system for potable water use and the on-site wastewater treatment system. Rawiga Golf Club would maintain the required permits for these activities and fulfil the permit requirements, include required operational, monitoring, and reporting requirements. Consequently, utility impacts would be minor.

As part of the future development of the expanded cemetery at the Site, it is anticipated that the existing Site buildings would be demolished and the existing Site utilities would be removed, including the small water treatment system and the small wastewater treatment plant. New utility lines (electric and water) would likely be extended onto the Site from the existing cemetery. VA would likely continue to use the on-site ponds for cemetery irrigation. The existing Site water wells, water treatment system, and wastewater treatment plants would be decommissioned/removed in accordance with OEPA requirements. If additional buildings with restrooms are constructed on the Site, they would likely utilize on-site septic systems installed in accordance with Medina County Health Department and OEPA requirements. Utility use and connections for the expanded cemetery would be determined during the cemetery design.

Utility impacts would be less than significant.

3.16.2 Effects of the No Action Alternative

Under the No Action Alternative, no utility impacts by VA would occur. The Site would likely continue to be used as a golf course with little public utility use.

3.17 Environmental Justice

In 1994, EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, was issued to focus attention of federal agencies on human health and environmental conditions in minority and low-income communities and to ensure that disproportionately high and adverse human health or environmental effects on these communities are identified and addressed. The USEPA-developed EJSCREEN, an environmental justice mapping and screening internet application, was used to obtain information regarding minority and low-income populations in the Site area. A two-mile buffer boundary was used because of the low population density in the Site area.

The results of the EJSCREEN indicate the Site vicinity includes a much lower minority population (4 percent) than the State of Ohio as a whole (21 percent) and a lower low-income population (21 percent) than the State of Ohio (32 percent).

3.17.1 Effects of the Proposed Action

The Proposed Action would have negligible environmental justice effects. The Site is not located in an area with elevated low-income or minority populations and the Proposed Action would have only minor impacts on the residents in the area. During future cemetery construction, effects on nearby residential land uses, such as through noise and dust, would be limited and controlled through BMPs described in Section 4.

3.17.2 Effects of the No Action Alternative

Under the No Action Alternative, no development by VA would occur at the Site. The Site would likely remain a golf course for the foreseeable future with no direct environmental justice effects. However, VA would not secure land necessary to meet its long-term cemetery needs for the region. The absence of a national cemetery in north-central Ohio after the OWRNC reaches its capacity would have a disproportionate effect on low-income Veterans and their families in the region, who are less able to afford travel to a more distant national cemetery.

3.18 Cumulative Impacts

The CEQ Regulations define cumulative impacts as those which "result from the incremental impact of the Proposed Action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such other actions," (40 CFR 1508.7).

Cumulative impact analysis captures the effects that result from the Proposed Action in combination with the effects of other actions taken before, during, or after the Proposed Action in the same geographic area.

The Site is situated in a rural area of mostly agricultural and residential land, approximately 1.5 miles northwest of the City of Rittman. With the exception of OWRNC to the north, the Site is surrounded by unimproved agricultural land and low-density, scattered residences. The area surrounding the Site has been largely unchanged in the past 50 years, with no notable new development other than the initial construction of OWRNC in 2000 (65 acres) and its current second phase of development (30 acres). A few houses have been constructed along existing area roads within the past 25 years and a residential subdivision was constructed approximately 1,000 feet southeast of the Site in the early 2000s. Considerable mostly undeveloped (agricultural) land is present in the Site area that could be developed in the future; however, development is likely to continue at a slow pace, based on the rural character of the area. No development plans for off-site properties in the immediate vicinity of the Site were identified, other than the continued phased development of OWRNC.

3.18.1 Effects of the Proposed Action

The Proposed Action would result in the impacts to the Site area identified in Sections 3.3 through 3.17. These include potential adverse impacts to aesthetics, air quality, geology and soils, hydrology and water quality, wildlife and habitat, noise, land use, floodplains, wetlands, socioeconomics, solid waste and hazardous materials, transportation, and utilities. All of these potential impacts are less than significant and would be further reduced through careful coordination and implementation of general BMPs; management, minimization, and avoidance measures; and compliance with regulatory requirements, as identified in Section 4. Given the nature of the Proposed Action, the limited recent development in the Site area, and the unlikely future large-scale development in the area surrounding the Site, no significant cumulative adverse effects to any of these resource areas are anticipated.

The cumulative impacts of the Proposed Action in combination with the OWRNC and its phased expansion would be less than significant. The Proposed Action would provide NCA additional land to increase the number of OWRNC development phases and extend the longevity of the cemetery for new interments, but would not increase the rate of interments or the rate of cemetery development. Supplemental NEPA analysis will be conducted for each phase of cemetery expansion, resulting in the identification and implementation of phase-specific management, minimization and avoidance measures to reduce potential adverse effects. This process would minimize potential cumulative impacts.

No significant adverse cumulative impacts to the environment, induced by the Proposed Action, are anticipated within the region. Coordination between VA, federal and state agencies, Medina County, Wayne County, the City of Rittman, and community representatives would serve to manage and control cumulative effects within the region, including managing regional transportation increases with adequate infrastructure. Implementation of local land use and resource management plans would serve to control the extent of environmental impacts, and continued planning would ensure future socioeconomic conditions maintain the quality of life the area's residents currently enjoy. Implementation of effective resource management plans and programs should minimize or eliminate any potential cumulative degradation of the natural ecosystem, cultural or human environment within the region of influence of the Proposed Action.

3.18.2 Effects of the No Action Alternative

Under the No Action Alternative, no cumulative impacts are anticipated, as the Site would likely remain a golf course.

3.19 Potential for Generating Substantial Public Controversy

As discussed in Sections 5 and 6, VA has solicited input from the pubic and various federal, state, and local government agencies regarding the Proposed Action. Several government agencies have provided input; none of the input has identified opposition or controversy related to the Proposed Action. No input was received from the public in response to the scoping notice. VA will publish and distribute the Draft EA for a 30-day public comment period. Public comments will be considered and addressed in the Final EA.

4.0 MANAGEMENT, MINIMIZATION, AND MITIGATION MEASURES

This section summarizes the management, minimization, and avoidance measures, and mitigation measures (if necessary), that are proposed to minimize and maintain potential adverse effects of the Proposed Action at acceptable, less-than-significant levels. A supplemental NEPA analysis will be conducted for the construction and operation of the expanded cemetery at the Site, during the Site design. The management, minimization, and avoidance measures in this section would be included into the future process and analysis.

Per established protocols, procedures, and requirements, VA and its contractors would implement BMPs and would satisfy all applicable regulatory requirements in association with the design, construction, and operation of the proposed expanded national cemetery at the Site. These "management measures" are described in this EA and are included as components of the Proposed Action. "Management measures" are defined as routine BMPs and/or regulatory compliance measures that are regularly implemented as part of proposed activities, as appropriate, across Ohio. In general, implementation of such management measures would maintain impacts at acceptable levels for all resource areas analyzed. These are different from "mitigation measures," which are defined as project-specific requirements, not routinely implemented as part of development projects, necessary to reduce identified potentially significant adverse environmental impacts to less-than-significant levels.

The routine BMPs, and management, minimization, and avoidance measures summarized in Table 4-1 would be included by VA in the Proposed Action to minimize and maintain adverse effects at less-than-significant levels.

Table 4-1 Management, Minimization, and Avoidance Measures Incorporated into the Proposed Action

Technical Resource Area	Measure
Aesthetics	Develop the cemetery in concert with the Site's natural topography. Maintain some natural areas.
	Use natural buffers and/or berms between the developed portions of the cemetery and adjacent residential properties.
Air Quality	Use appropriate dust suppression methods (such as the use of water, dust palliative, covers, suspension of earth moving in high wind conditions) during onsite construction activities.
	Stabilize disturbed areas through re-vegetation or mulching if the areas would be inactive for several weeks or longer. Specific requirements would be identified with the Stormwater Pollution Prevention Plan.
	Implement measures to reduce diesel particulate matter emissions from construction equipment, such as reducing idling time and using newer equipment with emissions controls.
	Comply with the applicable OEPA Air Pollution Control regulations.
Cultural and Historic Resources	Should potentially historic or culturally significant items be discovered during project construction, the construction contractor would immediately cease work until VA, a qualified archaeologist, Ohio SHPO, Tribes and other consulting parties are contacted to properly identify and appropriately treat discovered items in accordance with applicable state and federal laws.

Technical Resource Area	Measure
Geology, Topography, and Soils	Control soil erosion and sedimentation impacts during construction by implementing erosion prevention measures and complying with the OEPA Division of Surface Water National Pollutant Discharge Elimination System (NPDES) Construction Activity - Stormwater Discharges permitting process. Implement effective controls per a site-specific Stormwater Pollution Prevention Plan (SWPPP). The NPDES permit would require stormwater runoff and erosion management using BMPs, such as earth berms, vegetative buffers and filter strips, and spill prevention and management techniques. The construction contractor would implement the sedimentation and erosion control measures specified in the NPDES permit and the SWPPP to protect surface water quality.
	Complete a Farmland Conversion Impact Rating Form (Form AD-1006) in conjunction with United States Department of Agriculture – Natural Resources Conservation Service (USDA-NRCS) for the Site.
Hydrology and Water Quality	Ensure the existing Site public water system, Class V injection well, and wastewater treatment system are operated and maintained in accordance with the OEPA permit requirements during their continued use.
	Remove/properly abandon the existing drinking water system, Class V injection well, wastewater treatment system, and unneeded water wells following the termination of the golf course lease.
	Control soil erosion and sedimentation impacts during construction by complying with the NPDES permit and the SWPPP.
	Design improvements in accordance with the requirements of Energy Independence and Security Act Section 438 with respect to stormwater runoff quantity and characteristics.
	Ensure the cemetery design includes sufficient on-site stormwater management so as not to adversely affect the water quantity/quality in receiving waters and/or offsite areas.
	Use native, low-moisture tolerant species to the extent practicable to reduce the need for irrigation.
Wildlife and Habitat	Design cemetery to maintain buffers of undisturbed land around Tommy Run, its tributary, the on-site ponds, and delineated wetlands, to the extent possible.
	Re-evaluate the potential for protected species at the Site during the future cemetery expansion design. Coordinate and consult with USFWS and ODNR, and conduct pre-development biological surveys, as necessary.
	Conduct tree clearing between October 1 and through March 31, outside the Indiana bat and northern-long eared bat roosting season. If tree clearing/removal activities cannot be conducted outside of bat roosting season, conduct a summer presence/absence survey to confirm protected bats are not present before tree clearing. Consult with USFWS to prior to tree clearing.
	Use native species to the extent practicable when re-vegetating land disturbed by construction to avoid the potential introduction of non-native or invasive species.

Technical Resource Area	Measure
Noise	Limit, to the extent possible, construction and associated heavy truck traffic to occur between 7:00 a.m. and 6:00 p.m. on Monday through Friday, or during normal, weekday, work hours.
	Locate stationary operating equipment as far away from sensitive receptors as possible.
	Shut down noise-generating heavy equipment when it is not needed.
	Maintain equipment per manufacturer's recommendations to minimize noise generation.
	Encourage construction personnel to operate equipment in the quietest manner practicable (such as speed restrictions, retarder brake restrictions, and engine speed restrictions).
Land Use	None required.
Wetlands, Floodplains, and Coastal Zone Management	Complete an updated wetland survey during the future cemetery expansion design. Design cemetery improvements to avoid identified wetlands and surface waters to the extent possible.
	If cemetery design requires construction within a wetland or stream area, submit requests for jurisdictional determination to the USACE and OEPA, obtain all necessary permits and approvals from the agencies, and implement any required mitigation.
	Maintain green space buffers between the delineated wetlands/surface waters and the cemetery development areas. Ensure all buffers are staked and protected to prevent disturbance during cemetery construction.
	Design improvements in accordance with the requirements of Energy Independence Security Act Section 438 with respect to stormwater runoff quantity so as not to adversely affect the flood elevations or water quantity/quality in downstream receiving waters.
Socioeconomics	Secure construction areas to prevent unauthorized access by children from nearby residential areas.
Community Services	None required.
Solid Waste and Hazardous Materials	Prior to termination of the golf course lease, conduct sampling in the areas of petroleum product and hazardous materials storage and handling to confirm that no releases have occurred. Remediate and/or manage any contamination that is identified, as required, to prevent unacceptable human and ecological exposures. Inform cemetery construction contractors of known/suspect residual contamination, if any, to ensure any excavated soil is properly handled.
	Complete an asbestos survey of the current Site buildings. Remove and properly dispose of asbestos containing materials that are identified in accordance with the National Emission Standards for Hazardous Air Pollutants and State of Ohio requirements prior to building demolition.
	Comply with applicable federal and state laws governing the use, generation, storage, transportation, and disposal of solid waste and hazardous materials.

Technical Resource Area	Measure
Traffic, Transportation, and Parking	Coordinate with the Medina County Road Department, Wayne County Engineer and Ohio Department of Transportation, as applicable, during the cemetery design to identify and implement roadway improvements in the vicinity of the Site, if necessary.
	Ensure cemetery expansion activities do not adversely affect traffic flow on local roadways; construction would be timed to avoid peak travel hours.
	Ensure debris and/or soil is not deposited on local roadways during the construction activities.
Utilities	Decommission/remove the existing drinking water system, wastewater treatment system, and unneeded water wells in accordance with OEPA requirements following the termination of the golf course lease.
	Contact the local utility providers during the cemetery design to determine the connection/extension requirements and implement the necessary requirements.
	Design, install, and operate on-site septic systems in accordance with Medina County Health Department and OEPA requirements, to the extent practicable.
Environmental Justice	None required.

5.0 PUBLIC PARTICIPATION

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, VA's regulations for implementing NEPA. Additional guidance is provided in *VA's NEPA Interim Guidance for Projects.* Consideration of the views and information of all interested persons promotes open communication and enables better decision-making. Members of the public with a potential interest in the Proposed Action are encouraged to participate. A record of the public involvement associated with this EA is provided in Appendix F.

5.1 Scoping

VA initiated the NEPA public scoping process for the Proposed Action in October 2021, which included a public notice published in local newspapers of general circulation. The notice was published in the Medina Gazette on October 1 and 5, 2021 and the Northern Wayne Post on October 8, 2021. No public comments or input were received in response to the scoping notice.

5.2 Public Review

VA will publish and distribute the Draft EA for a 30-day public comment period, as announced by a Notice of Availability (NOA) published in the Medina Gazette and Northern Wayne Post. A copy of the Draft EA will be made available for review at a local library and on the VA Office of Construction and Facilities Management Environmental Program website: (https://www.cfm.va.gov/environmental/index.asp). VA will also email notification of the Draft EA for review and comment, with a link to the Draft EA on VA's website, to each of the government agencies and Tribes that were contacted during the NEPA scoping and Section 106 consultation. VA will respond to agency and public comments within the Final EA.

6.0 AGENCIES AND PERSONS CONSULTED

6.1 Agency Coordination

Agencies consulted for this EA include:

- U.S. Fish and Wildlife Service
- U.S. Environmental Protection Agency
- U.S. Army Corps of Engineers
- U.S. Department of Agriculture Natural Resource Conservation Service
- Ohio Department of Natural Resources (various divisions)
- Ohio Department of Transportation - District 3
- Ohio Environmental Protection Agency (various divisions)
- Ohio History Connection (Ohio SHPO)
- Medina County (various departments)
- Medina County Historical Society
- Akron Regional Air Quality Management District
- Rittman Planning Commission
- Wayne County (various departments)
- Wayne County Historical Society
- Milton Township
- Native American Tribes

VA initiated the agency scoping process for the Proposed Action in September 2021, which included emailing the agencies scoping letters with a request for input, information, and comment based on the available information regarding the Proposed Action.

VA received responses from the following agencies: USEPA, USFWS, Ohio SHPO, OEPA, the Wayne County Planning Department, and the Eastern Shawnee Tribe of Oklahoma. 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 B. The following summarizes that input, which VA used to focus this EA's analysis:

- **USEPA** recommended conducting soil testing in the areas where chemicals or waste have been stored onsite, as well as parking lots and golf cart refueling areas. USEPA also recommended that VA consider opportunities to provide or enhance pollinator habitat in project area. In addition, USEPA recommended that the EA include consultation documents regarding historic resources, wetlands, and Federal and state threatened and endangered species.
- **USFWS** stated endangered Indiana bats and threatened northern long-eared bats occur throughout the State of Ohio and may be found wherever suitable habitat occurs. Suitable summer habitats for these bats consists of a variety of forested/wooded habitats and suitable isolated trees within 1,000 feet of other forested/wooded habitat. USFWS recommended avoiding the removal of trees that are 3 or more inches dbh, wherever possible. If trees greater than 3 inches dbh cannot be avoided, USFWS recommended their removal only between October 1 and March 31. If seasonal tree clearing is not possible, a summer presence/absence survey by an approved surveyor would be required to confirm protected bats are not present before tree clearing. USFWS commented further that no tree clearing should occur until consultation under Section 7 of the ESA between USFWS and VA has been completed.

USFWS also recommended avoiding and minimizing impacts to all wetland habitats to the maximum extent possible to benefit water quality and fish and wildlife habitat. USFWS stated that natural buffers around streams and wetlands should be preserved to enhance beneficial functions. USFWS recommended best management practices to minimize erosion, especially on steep slopes, and revegetating disturbed areas with native plant species.

USFWS stated that they do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat.

- **Ohio SHPO** indicated that they had been in contact with Row 10 and ERG (on behalf of VA) regarding a Phase I Archaeological Survey of the Site and provided comments on a statement of work for the archaeological survey in August 2021. Additional information regarding NHPA Section 106 consultation with Ohio SHPO is provided in Section 6.2.
- **Ohio EPA** indicated that the Site has an active public water system (operated by Rawiga Golf Club). Ohio EPA stated that should VA take ownership of the Site, VA would be in responsible charge of the public water system and thereby would need to comply with the requirements associated with the public water system, including sampling, fees and potentially an operator of record requirement. Ohio EPA also provided a link to public records available for the Site on their eDocument search web page.
- The **Wayne County Planning Department** indicated the proposed split of the approximately one-half acre of land from the southwestern Site parcel (located in Milton Township) would require a variance from the Wayne County Planning Commission because Wayne County subdivision regulations require a minimum parcel size of 1.25 acres.
- The **Eastern Shawnee Tribe of Oklahoma** stated the Proposed Action poses no adverse effect or endangerment to known sites of interest to the Eastern Shawnee Tribe. Additional information from VA's Native American consultation is provided in Section 6.3.

6.2 National Historic Preservation Act Section 106 Consultation

On April 6, 2022, VA initiated NHPA Section 106 consultation with the Ohio SHPO regarding the Proposed Action. The Section 106 consultation letter sent to the Ohio SHPO included a description of VA's proposed undertaking (Proposed Action), definition of the APE, identification of historic properties (the results of the ICRIP and Phase I Archaeological Survey), and VA's finding of effects on historic properties (no historic properties affected).

The Ohio SHPO concurred with VA's findings and no adverse effect determination in a response letter dated May 5, 2022.

In May 2022, VA initiated NHPA Section consultation with federally recognized Tribes with possible geographic or cultural affiliation with the Site area, the Medina County Historical Society, the Northern Ohio Golf Association, and Diamond Golf Group, LLC. These Section 106 consultation letters included a description of VA's proposed undertaking, definition of the APE, the identification of historic properties, and VA's finding of effects on historic properties (no historic properties affected).

The Eastern Shawnee Tribe of Oklahoma responded to the NEPA scoping (see Section 6.3). No other agencies or Tribes have responded and none have elected to participate in the Section 106 consultation process.

Written Section 106 correspondence with Ohio SHPO and other consulting parties is provided in Appendix C.

6.3 Native American Consultation

VA initiated consultation with 18 federally recognized Tribes as part of this NEPA process, in accordance with 36 CFR 800.2 and EO 13175, *Consultation and Coordination with Indian Tribal Governments*. These Tribes identified as having possible geographic or cultural affiliation with the area of the Site were invited by VA to participate in the Section 106 process in May 2022. Tribes consulted include:

- Absentee-Shawnee Tribe of Indians of Oklahoma
- Citizen Potawatomi Nation
- Delaware Nation
- Delaware Tribe of Indians
- Eastern Shawnee Tribe of Oklahoma
- Forest County Potawatomi Community of Wisconsin
- Hannahville Indian Community, Michigan
- Miami Tribe of Oklahoma
- Ottawa Tribe of Oklahoma
- Peoria Tribe of Indians of Oklahoma
- Pokagon Band of Potawatomi
- Prairie Band Potawatomi Indians
- Seneca Nation of Indians
- Seneca-Cayuga Nation
- Shawnee Tribe
- Tonawanda Nation
- Turtle Mountain Band of Chippewa Indians
- Wyandotte Nation

The Eastern Shawnee Tribe of Oklahoma responded that upon research of their databases and files, the Tribe occupied the Site area historically and/or prehistorically. However, the Tribe stated the project poses no adverse effect or endangerment to known sites of interest to the Eastern Shawnee Tribe. The Tribe requested to be contacted, as well as the appropriate state agencies, and that all ground disturbing activity stop, should the project inadvertently discover an archeological site or object.

No other Tribal responses have been received by VA.

Written Section 106 correspondence with Tribes is provided in Appendix C.

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8.0 REFERENCES

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Medina County: https://www.medinaco.org/

Guilford Township: https://www.guilfordtownship.us/

Wayne County: https://www.wayneohio.org/

Milton Township: http://www.miltonsterling.org/

Mid-Ohio Regional Planning Commission: https://www.morpc.org/tool-resource/traffic-counts/

Ohio Department of Environmental Protection: https://www.epa.state.oh.us/

Ohio Department of Natural Resources: https://ohiodnr.gov/

Ohio Department of Transportation: https://www.transportation.ohio.gov/wps/portal/gov/odot/

US Army Corps of Engineers: http://www.usace.army.mil

National Wetlands Inventory: https://www.fws.gov/wetlands/Data/mapper.html

FEMA Flood Hazard Insurance Map: http://msc.fema.gov/portal

US Bureau of Census (2020 US Census Data): http://www.census.gov

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US Environmental Protection Agency: https://www.epa.gov

US Fish and Wildlife Service: https://www.fws.gov

US Geological Survey: https://store.usgs.gov/map-locator

Various mapping tools: www.maps.google.com, www.google.earth.com, etc.

9.0 GLOSSARY

100-Year Flood – A flood event of such magnitude that it occurs, on average, every 100 years; this equates to a one percent chance of it occurring in a given year.

Aesthetics – Pertaining to the quality of human perception of natural beauty.

Ambient - The environment as it exists around people, plants, and structures.

Ambient Air Quality Standards - Those standards established under the Clean Air Act to protect health and welfare.

Aquifer - An underground geological formation containing usable amounts of groundwater which can supply wells and springs.

Asbestos - Incombustible, chemical-resistant, fibrous mineral forms of impure magnesium silicate used for fireproofing, electrical insulation, building materials, brake linings, and chemical filters. Asbestos is a carcinogenic substance.

Attainment Area - Region that meets the National Ambient Air Quality Standard (NAAQS) for a criteria pollutant under the Clean Air Act.

Bedrock - The solid rock that underlies all soil, sand, clay, gravel and loose material on the earth's surface.

Best Management Practices (BMPs) - Methods, measures, or practices to prevent or reduce the contributions of pollutants to U.S. waters. Best management practices may be imposed in addition to, or in the absence of, effluent limitations, standards, or prohibitions (AR 200-1).

Commercial land use – Land use that includes private and public businesses (retail, wholesale, etc.), institutions (schools, churches, etc.), health services (hospitals, clinics, etc.), and military buildings and installations.

Contaminants - Any physical, chemical, biological, or radiological substances that have an adverse effect on air, water, or soil.

Council on Environmental Quality (CEQ) - An Executive Office of the President composed of three members appointed by the President, subject to approval by the Senate. Each member shall be exceptionally qualified to analyze and interpret environmental trends, and to appraise programs and activities of the federal government. Members are to be conscious of and responsive to the scientific, economic, social, aesthetic, and cultural needs of the Nation; and to formulate and recommend national policies to promote the improvement of the quality of the environment.

Criteria Pollutants - The Clean Air Act of 1970 required the USEPA to set air quality standards for common and widespread pollutants in order to protect human health and welfare. There are six "criteria pollutants": ozone (O_3), carbon monoxide (CO), sulfur dioxide (SO_2), lead (Pb), nitrogen dioxide (NO_2), and particulate matter.

Cultural Resources - The physical evidence of our Nation's heritage. Included are: archaeological sites; historic buildings, structures, and districts; and localities with social significance to the human community.

Cumulative Impact - The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).

Decibel (dBA) - A unit of measurement of sound pressure level whereby the decibel values of sounds at low frequencies are reduced.

Direct Impact - A direct impact is caused by a Proposed Action and occurs at the same time and place.

Emission - A release of a pollutant.

Endangered Species - Any species which is in danger of extinction throughout all or a significant portion of its range.

Environmental Assessment (EA) - An EA is a publication that provides sufficient evidence and analyses to show whether a proposed system will adversely affect the environment or be environmentally controversial.

Erosion - The wearing away of the land surface by detachment and movement of soil and rock fragments through the action of moving water and other geological agents.

Agricultural land - Cropland, pastures, meadows, and planted woodland.

Fauna - Animal life, especially the animal characteristics of a region, period, or special environment.

Flora - Vegetation; plant life characteristic of a region, period, or special environment.

Floodplain - The relatively flat area or lowlands adjoining a river, stream, ocean, lake, or other body of water that is susceptible to being inundated by floodwaters.

Fugitive Dust - Particles light enough to be suspended in air, but not captured by a filtering system. For this document, this refers to particles put in the air by moving vehicles and air movement over disturbed soils at construction sites.

Geology - Science which deals with the physical history of the earth, the rocks of which it is composed, and physical changes in the earth.

Groundwater - Water found below the ground surface. Groundwater may be geologic in origin and as pristine as it was when it was entrapped by the surrounding rock or it may be subject to daily or seasonal effects depending on the local hydrologic cycle. Groundwater may be pumped from wells and used for drinking water, irrigation, and other purposes. It is recharged by precipitation or irrigation water soaking into the ground. Thus, any contaminant in precipitation or irrigation water may be carried into groundwater.

Hazardous Substance - Hazardous materials are defined within several laws and regulations to have certain meanings. For this document, a hazardous material is any one of the following:

- Any substance designated pursuant to section 311 (b)(2)(A) of the Clean Water Act.
- Any element, compound, mixture, solution, or substance designated pursuant to Section 102 of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).
- Any hazardous substance as defined under the Resource Conservation and Recovery Act (RCRA).
- Any toxic pollutant listed under TSCA.
- Any hazardous air pollutant listed under Section 112 of the Clean Air Act.
- Any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action pursuant to Subsection 7 of TSCA.
- The term does not include: 1) Petroleum, including crude oil or any thereof, which is not otherwise specifically listed or designated as a hazardous substance in a above. 2) Natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas). A list of hazardous substances is found in 40 CFR 302.4.

Hazardous Waste - A solid waste which, when improperly treated, stored, transported, or disposed of, poses a substantial hazard to human health or the environment. Hazardous wastes are identified in 40 CFR 261.3 or applicable foreign law, rule, or regulation.

Hazardous Waste Storage - As defined in 40 CFR 260.10, ". . . the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere".

Hydric Soil - A soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic (oxygen-lacking) conditions that favor the growth and regeneration of hydrophytic vegetation. A wetland indicator.

Indirect Impact - An indirect impact is caused by a Proposed Action that occurs later in time or farther removed in distance but is still reasonably foreseeable. Indirect impacts may include induced changes in the pattern of land use, population density or growth rate, and related effects on air, water, and other natural and social systems. For example, referring to the possible direct impacts described above, the clearing of trees for new development may have an indirect impact on area wildlife by decreasing available habitat.

Industrial Land Use – Land uses of a relatively higher intensity that are generally not compatible with residential development. Examples include light and heavy manufacturing, mining, and chemical refining.

Isolated Wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, but do not have a direct connection to the Waters of the U.S.

Jurisdictional Wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, and have a direct connection to the Waters of the U.S. These wetlands are regulated by the USACE.

Listed Species - Any plant or animal designated by a state or the federal government as threatened, endangered, special concern, or candidate species.

Mitigation - Measures taken to reduce adverse impacts on the environment.

Mobile Sources - Vehicles, aircraft, watercraft, construction equipment, and other equipment that use internal combustion engines for energy sources.

Monitoring - A process of inspecting and recording the progress of mitigation measures implemented.

National Ambient Air Quality Standards (NAAQS) - Nationwide standards set up by the USEPA for widespread air pollutants, as required by Section 109 of the Clean Air Act. Currently, six pollutants are regulated by primary and secondary NAAQS: carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter, and sulfur dioxide.

National Environmental Policy Act (NEPA) - U.S. statute that requires all federal agencies to consider the potential effects of major federal actions on the human and natural environment.

National Historic Preservation Act (NHPA) - U.S. statute that requires federal agencies to evaluate the potential impact of federally funded or permitted projects on historic properties.

Non-attainment Area - An area that has been designated by the EPA or the appropriate State air quality agency as exceeding one or more national or state ambient air quality standards.

Parcel - A plot of land, usually a division of a larger area.

Particulates or Particulate Matter - Fine liquid or solid particles such as dust, smoke, mist, fumes, or smog found in air.

Physiographic Region - A portion of the Earth's surface with a basically common topography and common morphology.

Pollutant - A substance introduced into the environment that adversely affects the usefulness of a resource.

Potable Water - Water which is suitable for drinking.

Prime Agricultural land - A special category of highly productive cropland that is recognized and described by the U.S. Department of Agriculture's Natural Resource Conservation Service and receives special protection under the Surface Mining Law.

Remediation - A long-term action that reduces or eliminates a threat to the environment.

Riparian Areas - Areas adjacent to rivers and streams that have a high density, diversity, and productivity of plant and animal species relative to nearby uplands.

Sensitive Receptors - Include, but are not limited to, asthmatics, children, and the elderly, as well as specific facilities, such as long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, and childcare centers.

Significant Impact - According to 40 CFR 1508.27, "significance" as used in NEPA requires consideration of both context and intensity.

- Context. The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the Proposed Action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.
- Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action.

Soil - The mixture of altered mineral and organic material at the earth's surface that supports plant life.

Solid Waste - Any discarded material that is not excluded by section 261.4(a) or that is not excluded by variance granted under sections 260.30 and 260.31.

Threatened species - Any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

Topography - The relief features or surface configuration of an area.

Toxic Substance - A harmful substance which includes elements, compounds, mixtures, and materials of complex composition.

Waters of the United States - Include the following: Territorial seas and traditional navigable waters; perennial and intermittent tributaries that contribute surface water flow to such waters; certain lakes, ponds, and impoundments of jurisdictional waters; and wetlands adjacent to other jurisdictional waters.

Watershed - The region draining into a particular stream, river, or entire river system.

Wetlands - Areas that are regularly saturated by surface or groundwater and, thus, are characterized by a prevalence of vegetation that is adapted for life in saturated soil conditions. Examples include swamps, bogs, fens, marshes, and estuaries.

Wildlife Habitat - Set of living communities in which a wildlife population lives.