

APPENDIX A - LIST OF ENVIRONMENTAL PERMITS REQUIRED

LIST OF ENVIRONMENTAL PERMITS REQUIRED

A.1 REGULATORY FRAMEWORK

This EA has been prepared under the provisions of, and in accordance with the NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, and VA's regulations for implementing NEPA (38 CFR Part 26). In addition, the EA has been prepared as prescribed in VA's *NEPA Interim Guidance for Projects* (VA 2010). Federal, state, and local laws and regulations specifically applicable to this Proposed Action are identified, where appropriate, within this EA, and include:

- Endangered Species Act of 1973, as amended (7 USC 136; 16 USC 1531 et seq.).
- Energy Independence Security Act Section 438.
- Executive Order 11988, *Floodplain Management* (24 May 1977).
- Executive Order 11990, *Protection of Wetlands* (24 May 1977).
- Executive Order 12898, *Environmental Justice* (11 February 1994).
- Executive Order 13112, *Invasive Species* (8 February 1999).
- Executive Order 13834, *Efficient Federal Operations* (17 May 2018).
- Farmland Protection Policy Act (7 USC 4201, et seq.)
- Federal Clean Air Act of 1990 (42 USC 7401 et seq., as amended).
- Federal Clean Water Act (Federal Water Pollution Control Act) of 1948, as amended (1972, 1977) (33 USC 1251 et seq.); Sections 401 and 404.
- Migratory Bird Treaty Act (MBTA; 16 USC 703-712, 3 July 1918; as amended 1936, 1960, 1968, 1969, 1974, 1978, 1986, and 1989).
- National Environmental Policy Act (NEPA) of 1969.
- National Historic Preservation Act (NHPA) of 1966, as amended (36 CFR Part 800).
- Native American Graves Protection and Repatriation Act, as amended (25 USC 3001 et seq.).
- Ohio Administrative Code (OAC), 1501 Department of Natural Resources, 18 Division of Endangered Species, 1 Endangered Species of Native Ohio Wild Plants and 31 Endangered Wild Animals.
- OAC, 3701 Department of Health, 28 Private Water Systems.
- OAC, 3701 Department of Health, 29 Household Sewage Disposal Systems.
- OAC, 3745 Ohio Environmental Protection Agency, 1 Water Quality Standards.
- OAC, 3745 Ohio Environmental Protection Agency, 9 Water Well Standards.
- OAC, 3745 Ohio Environmental Protection Agency, 15 General Provisions on Air Pollution Control and General Permit for Air Pollution Sources.
- OAC, 3745 Ohio Environmental Protection Agency, 20 Asbestos Emission Control.
- OAC, 3745 Ohio Environmental Protection Agency, 32 Section 401 Water Quality Certifications.
- OAC, 3745 Ohio Environmental Protection Agency, 34 Underground Injection Control Program.
- Ohio Revised Code (ORC), Title 61 Water Supply-Sanitation-Ditches, Chapter 6111 Water Pollution Control.

- Medina County Stormwater Management and Sediment Control Rules and Regulations
- Medina County Sanitary Engineering Department Regulations
- Medina County Health Department Regulations
- Wayne County Stormwater Management Regulations

A.2 ENVIRONMENTAL PERMITS REQUIRED

In addition to the regulatory framework of NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, VA's NEPA regulations (38 CFR Part 26), and VA's *NEPA Interim Guidance for Projects*, the following federal, state, and/or local environmental permits are required as part of this Proposed Action, and include:

- OEPA NPDES Construction Stormwater General Permit
- OEPA NPDES Permit (for continued operation of the Site wastewater treatment system)
- OEPA UIC Class V Injection Well Permit (for continued discharge of the Site drinking water treatment residuals)
- CWA Section 404/Section 401 permits (for USACE jurisdictional WOTUS impacts)
- OEPA Isolated Wetlands Permit (for non-USACE jurisdictional wetland impacts)
- OEPA Notification of Demolition and Renovation (for asbestos abatement)
- OEPA Site Evaluation Request/Permit to Install (for non-residential septic systems)
- Other required environmental permits will be determined during the cemetery design.

APPENDIX B – AGENCY CORRESPONDENCE

From: Marinucci, Marianne (CFM) <Marianna.Marinucci@va.gov>

Sent: Tuesday, September 28, 2021 2:06 PM

To: Richard Banchoff <rbanchoff@isiwdc.com>

Subject: Scoping and Stakeholder Involvement for the Proposed Land Acquisition for the Future Ohio Western Reserve National Cemetery Expansion

FYI

From: Elliott, Glenn (CFM) <Glenn.Elliott@va.gov>

Sent: Tuesday, September 28, 2021 11:43 AM

To: Patrice_Ashfield@fws.gov; Newton.Cheryl@epa.gov; pa2@usace.army.mil; rocemi.morales@usda.gov; john.knapp@usda.gov; dan.balser@dnr.ohio.gov; mike.angle@dnr.state.oh.us; jeff.johnson@dnr.state.oh.us; eric.vendel@dnr.ohio.gov; water@dnr.state.oh.us; kendra.wecker@dnr.state.oh.us; d03.pio@dot.ohio.gov; tim.fischer@epa.ohio.gov; Bob.Princic@epa.ohio.gov; natalie.oryshkewych@epa.ohio.gov; lynn.sowers@epa.ohio.gov; Patricia.Vanah@epa.ohio.gov; stivo.difranco@epa.ohio.gov; rbeck@ohmedinaco.org; rbeck@ohmedinaco.org; rbeck@ohmedinaco.org; jdieter@medinaco.org; srubens@schd.org; bbeshara@rittman.com; swolfe@wayneoh.org; sam@wayne-county-engineer.com; jkipper@wayneohio.org; dennis.hartzler@miltonsterling.org; amcardle@achp.gov; aterrell@ohiohistory.org; mchs@zoominternet.net; host@waynehistoricalohio.org; bbarnes@estoo.net; Michael.LaRonge@FCPotawatomi-nsn.gov; tyderyien@hannahville.org; dhunter@miamination.com; rhonda.oto@gmail.com; joe.stahlman@sni.org; wtarrant@sctribe.com; sclemons@wyandotte-nation.org

Cc: Sturm, Jason R. (CFM) <Jason.Sturm@va.gov>

Subject: Scoping and Stakeholder Involvement for the Proposed Land Acquisition for the Future Ohio Western Reserve National Cemetery Expansion

Dear Valued Stakeholders,

The US Department of Veterans Affairs (VA) Office of Construction and Facilities Management is gathering information to assist with the preparation of an Environmental Assessment (EA) as part of the federal decision-making process for the proposed acquisition of approximately 156 acres of land currently occupied by the Rawiga Golf & Swim Club at 10353 Rawiga Road in Seville, Ohio (Site) for the future expansion of the adjacent Ohio Western Reserve National Cemetery (OWRNC), located at 10175 Rawiga Road in Rittman, Ohio (Proposed Action). VA would purchase the Site and lease it back to the current owners for continued operation of the golf course and swim club for at least 15 years, until expansion of the OWRNC becomes necessary. The current Site owners have offered to sell the Site to VA.

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). A small storage area (less than one half acre) located in the southwestern Site parcel, south of the current golf course maintenance area, is not included in the Site.

The Site is located along the east side of Rawiga Road, east of its intersection with Schaub Road, directly south of OWRNC. The Site is currently occupied by a golf and swim club, consisting of an 18-hole golf course with associated golf cart paths, five ponds, sand traps, one picnic pavilion and three shelters, a covered bridge, a swimming pool and 11 buildings. Tommy Run flows north-south across the central portion of the Site and a small unnamed tributary to Chippewa Creek is present in 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. The location and general features of the Site is shown on Figures 1 through 3.

Site plans for the proposed cemetery expansion have not been developed. The design for the expanded cemetery at the Site would be initiated when expansion becomes necessary. The Site would be developed similarly to the current OWRNC, and would contain pre-placed crypt gravesites, columbarium wall structures, areas for in-ground cremains, paved roadways, and committal shelters. The cemetery expansion would be developed in concert with the existing Site topography and natural features.

As part of the decision-making process, VA will undertake an environmental analysis of the Proposed Action in compliance with the requirements of the National Environmental Policy Act (NEPA). VA is seeking input as part of the scoping process on issues to be addressed during the NEPA analysis, including environmental concerns.

NEPA requires that a federal agency provide the public with an opportunity to participate in the process of analyzing the impact of federal actions on the human environment. The purpose of this letter is to notify members of the community and other stakeholders of this opportunity to assist VA in identifying issues, including environmental concerns that may occur as a result of the proposed federal action.

VA will also be initiating consultation under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108 at a future date. VA will be consulting with the State Historic Preservation Office, Tribes, and other consulting parties to identify historic properties that may potentially be affected by the undertaking and to seek ways to avoid, minimize or mitigate for potential adverse effects.

If you have comments on the scope of issues for analysis, or input on potential alternatives or information/analyses relevant to the Proposed Action, please submit your comments/input via email to vacoenvironment@va.gov with the subject line "Ohio Western Reserve National Cemetery Expansion NEPA EA Scoping" by **October 28, 2021**. For additional information or questions, please contact Mr. Jason Sturm, VA Environmental Engineer, at jason.sturm@va.gov or (224) 628-1946. Reference "Ohio Western Reserve National Cemetery Expansion NEPA EA Scoping " in your correspondence.

VA anticipates releasing the Draft EA for a 30-day public review and comment period in late 2021/early 2022. VA will notify stakeholders via email/mail, publish a notice of availability of the Draft EA in the local newspaper, and solicit comments at that time. The Draft EA will be available for review at a local library and via the VA website: [Environmental Program Office - Office of Construction & Facilities Management \(va.gov\)](#)

Respectfully,

Glenn Elliott

"Fortitudine Vincimus" By Endurance We Conquer.

Glenn Elliott | Director | Environmental Program Office
Department of Veterans Affairs | Construction and Facilities Management (CFM)
a: 425 "I" St. N.W. | Washington D.C. | 20001
w: 202-632-5879 | c: 202-360-1243 | e: glenn.elliott@va.gov
[VA Website](#) | [CFM Website](#) | [Sustainable Design](#) | [TIL](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



DEPARTMENT OF VETERANS AFFAIRS
Construction & Facilities Management
425 I Street, NW
Washington DC 20001

Date: September 28, 2021

To: Valued Stakeholders

Subject: Notice of Scoping and Stakeholder Involvement for the
Proposed Land Acquisition for the Future
Ohio Western Reserve National Cemetery Expansion
Seville, Ohio

The US Department of Veterans Affairs (VA) Office of Construction and Facilities Management is gathering information to assist with the preparation of an Environmental Assessment (EA) as part of the federal decision-making process for the proposed acquisition of approximately 156 acres of land currently occupied by the Rawiga Golf & Swim Club at 10353 Rawiga Road in Seville, Ohio (Site) for the future expansion of the adjacent Ohio Western Reserve National Cemetery (OWRNC), located at 10175 Rawiga Road in Rittman, Ohio (Proposed Action). VA would purchase the Site and lease it back to the current owners for continued operation of the golf course and swim club for at least 15 years, until expansion of the OWRNC becomes necessary. The current Site owners have offered to sell the Site to VA.

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). A small storage area (less than one half acre) located in the southwestern Site parcel, south of the current golf course maintenance area, is not included in the Site.

The Site is located along the east side of Rawiga Road, east of its intersection with Schaub Road, directly south of OWRNC. The Site is currently occupied by a golf and swim club, consisting of an 18-hole golf course with associated golf cart paths, five ponds, sand traps, one picnic pavilion and three shelters, a covered bridge, a swimming pool and 11 buildings. Tommy Run flows north-south across the central portion of the Site and a small unnamed tributary to Chippewa Creek is present in 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.

The location and general features of the Site is shown on Figures 1 through 3.

Site plans for the proposed cemetery expansion have not been developed. The design for the expanded cemetery at the Site would be initiated when expansion becomes necessary. The Site would be developed similarly to the current OWRNC, and would contain pre-placed crypt gravesites, columbarium wall structures, areas for in-ground cremains, paved roadways, and committal shelters. The cemetery expansion would be developed in concert with the existing Site topography and natural features.

As part of the decision-making process, VA will undertake an environmental analysis of the Proposed Action in compliance with the requirements of the National Environmental Policy Act (NEPA). VA is seeking input as part of the scoping process on issues to be addressed during the NEPA analysis, including environmental concerns.

NEPA requires that a federal agency provide the public with an opportunity to participate in the process of analyzing the impact of federal actions on the human environment. The purpose of this letter is to notify members of the community and other stakeholders of this opportunity to assist VA in identifying issues, including environmental concerns that may occur as a result of the proposed federal action.

VA will also be initiating consultation under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108 at a future date. VA will be consulting with the State Historic Preservation Office, Tribes, and other consulting parties to identify historic properties that may potentially be affected by the undertaking and to seek ways to avoid, minimize or mitigate for potential adverse effects.

If you have comments on the scope of issues for analysis, or input on potential alternatives or information/analyses relevant to the Proposed Action, please submit your comments/input via email to vacoenvironment@va.gov with the subject line "Ohio Western Reserve National Cemetery Expansion NEPA EA Scoping" by **October 28, 2021**. For additional information or questions, please contact Mr. Jason Sturm, VA Environmental Engineer, at jason.sturm@va.gov or (224) 628-1946. Reference "Ohio Western Reserve National Cemetery Expansion NEPA EA Scoping" in your correspondence.

VA anticipates releasing the Draft EA for a 30-day public review and comment period in late 2021/early 2022. VA will notify stakeholders via email/mail, publish a notice of availability of the Draft EA in the local newspaper, and solicit comments at that time. The Draft EA will be available for review at a local library and via the VA website: [Environmental Program Office - Office of Construction & Facilities Management \(va.gov\)](#)

Respectfully,

Glenn Elliott,
Director Environmental Program Office
VA Construction & Facilities Management

Proposed Ohio Western Reserve National Cemetery Expansion Site
10353 Rawiga Road
Seville, Ohio



FIGURE 2

TOPOGRAPHIC LOCATION MAP

**Proposed Ohio Western Reserve National Cemetery Expansion Site
10353 Rawiga Road
Seville, Ohio**

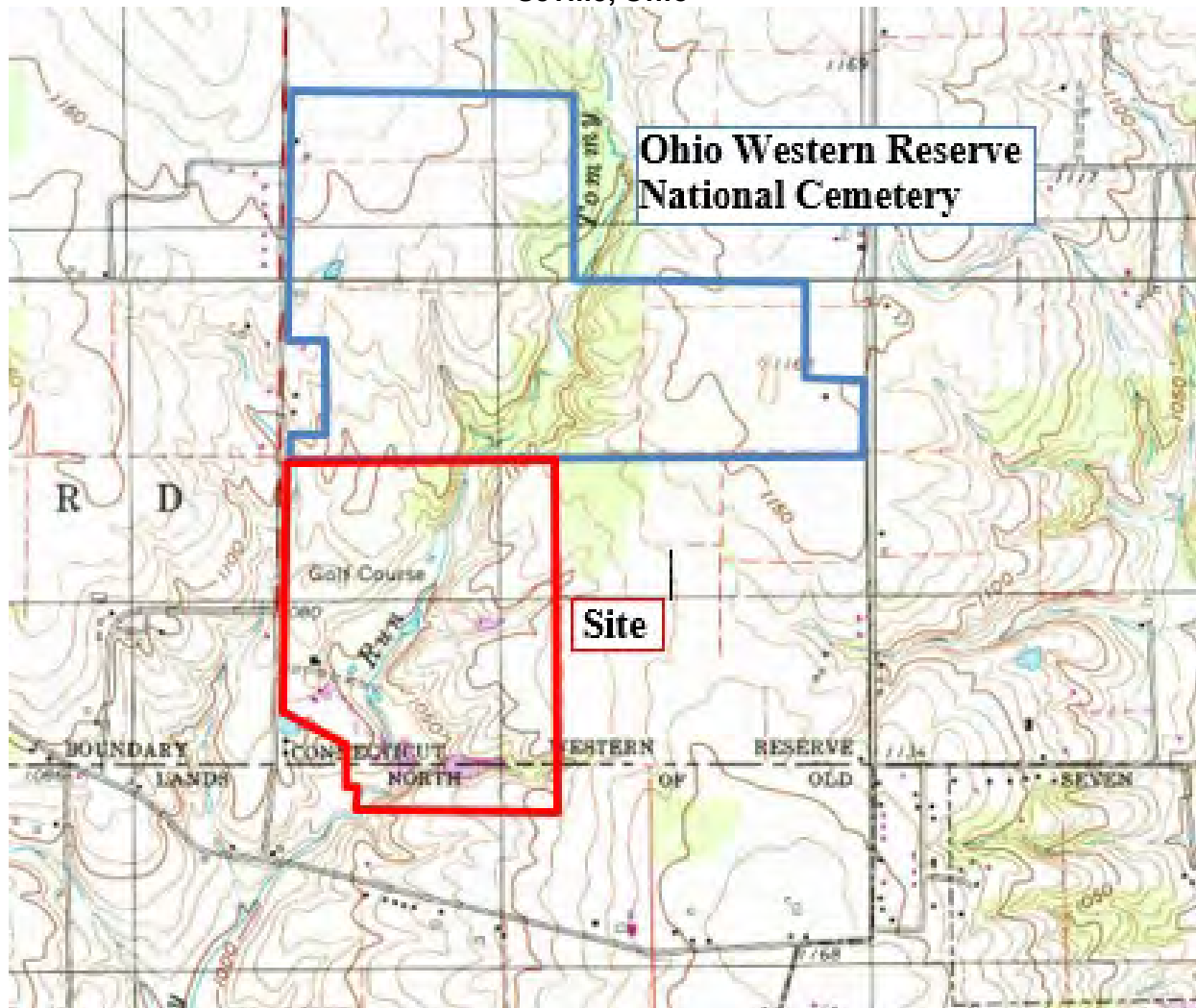


FIGURE 3

SITE AERIAL PHOTOGRAPH

**Proposed Ohio Western Reserve National Cemetery Expansion Site
10353 Rawiga Road
Seville, Ohio**





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

October 18, 2021

REPLY TO THE ATTENTION OF:
Mail Code RM-19J

Jason Sturm
Office of Construction and Facilities Management
U.S. Department of Veterans Affairs
425 I Street, Suite 6W417A
Washington, D.C. 20001

Re: Project Scoping for Proposed Land Acquisition for the Future Ohio Western Reserve National Cemetery Expansion, Medina and Wayne Counties, Ohio

Dear Mr. Sturm:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced scoping document dated September 28, 2021, which was prepared by the U.S. Department of Veterans Affairs (VA). We are providing scoping comments pursuant to our authorities under the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The proposed project involves acquisition of approximately 156 acres of land currently occupied by the Rawiga Golf & Swim Club for the future expansion of the adjacent Ohio Western Reserve National Cemetery (OWRNC). Cemetery development is not being proposed at this time. The existing golf course will remain operational via lease until future cemetery development is necessary.

Based on our review, we have comments relating to reuse of land, promoting pollinators, and consultation records, as stated below.

Reuse of Land

We understand the land being proposed for purchase is currently a golf course and pool. We applaud VA for proposing beneficial reuse of the site. We recommend VA conduct soil testing in areas where chemicals or waste have been stored on-site, as well as parking lots, golf cart refueling areas, etc. The test results and any proposed mitigation should be included in the EA.

Promoting Pollinators

Due to steep declines in certain pollinator populations, a 2014 Presidential Memorandum¹ was produced to address pollinator declines. Because pollinators are critical contributors to our nation's economy, food system, and environmental health, vegetation within the project area can provide much needed habitat for pollinators, providing food, shelter, and connections to other patches of habitat. Maintenance staff and landscape designers can all take steps to improve the quality of vegetation to benefit pollinators, steps that can also reduce costs, maintain public safety, and improve public good will. The EA should consider opportunities to provide or enhance pollinator habitat in the project areas.

Consultation Records

EPA recommends the EA include consultation documents regarding historic resources (Ohio State Historic Preservation Office), wetlands (U.S. Army Corps of Engineers), and Federal and state threatened and endangered species (U.S. Fish and Wildlife Service and the Ohio Department of Natural Resources, respectively).

We are available to discuss these scoping comments at your convenience. Please feel free to contact Mike Sedlacek of my staff at 312-886-1765, or by email at sedlacek.michael@epa.gov.

Sincerely,

Kenneth A. Westlake
Deputy Director, Tribal and Multimedia Programs Office
Office of the Regional Administrator

From: Ohio, FW3 <ohio@fws.gov>

Sent: Tuesday, October 12, 2021 7:57 AM

To: Elliott, Glenn (CFM) <Glenn.Elliott@va.gov>

Cc: Sturm, Jason R. (CFM) <Jason.Sturm@va.gov>; nathan.reardon@dnr.state.oh.us; Parsons, Kate <kate.parsons@dnr.state.oh.us>

Subject: [EXTERNAL] Ohio Western Reserve National Cemetery Expansion, Wayne and Medina Counties, Ohio



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



TAILS# 03E15000-2022-TA-0035

Dear Mr. Elliott,

The U.S Fish and Wildlife Service (Service) has received your recent correspondence requesting information about the subject proposal. We offer the following comments and recommendations to assist you in minimizing

and avoiding adverse impacts to threatened and endangered species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

Federally Threatened and Endangered Species: The endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees ≥ 3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves, rock crevices and abandoned mines.

Seasonal Tree Clearing for Federally Listed Bat Species: Should the proposed project site contain trees ≥ 3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <http://www.fws.gov/midwest/endangered/mammals/nleb/index.html>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present. If implementation of this seasonal tree cutting recommendation is not possible, a summer presence/absence survey may be conducted for Indiana bats. If Indiana bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus it is important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. Disturbed areas

should be mulched and revegetated with native plant species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts.

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, Acting Environmental Services Administrator, at (614) 265-6387 or at mike.pettegrew@dnr.state.oh.us.

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

Sincerely,



Patrice Ashfield
Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Kate Parsons, ODNR-DOW

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From: Krista Horrocks <khorricks@ohiohistory.org>
Sent: Wednesday, October 27, 2021 2:16 PM
To: VACO Environment <VACOEnvironment@va.gov>
Cc: Sturm, Jason R. (CFM) <Jason.Sturm@va.gov>; Joy Williams <JWilliams@ohiohistory.org>
Subject: [EXTERNAL] Ohio Western Reserve National Cemetery Expansion NEPA EA Scoping

Thank you for the communication dated September 28, 2021 regarding the Ohio Western Reserve National Cemetery Expansion NEPA EA Scoping Project. Our office looks forwards to continued coordination regarding the proposed project.

Our office has been in contact with Row 10 Historic Preservation Solutions as well as Environmental Research Group, LLC (ERG) regarding a Phase I Archaeological Survey within the proposed expansion of the Ohio Western Reserve National Cemetery in the Rawiga Golf & Swim Club located at 10353 Rawiga Road in Seville, Ohio. A Statement of Work was proposed and our office offered comment on August 26, 2021.

Our office looks forward to continued coordination on the proposed Ohio Western Reserve National Cemetery Expansion Project with the VA, Row 10 Historic Preservation Solutions, and ERG.

Thank you,
Krista Horrocks

Krista Horrocks | Project Reviews Manager, State Historic Preservation Office
Ohio History Connection | 800 E. 17th Ave. Columbus, OH 43211-2474
p. 614.298.2022 | f. 614.298.2037 | khorricks@ohiohistory.org

Did you know the Ohio SHPO now accepts electronic-only submissions for state and/or federal review under Section 106 and ORC 149.53? Please send your submissions to section106@ohiohistory.org. We have also updated our [Survey Report Submission Standards](#).

The Ohio History Connection's [mission](#) is to spark discovery of Ohio's stories. Embrace the present, share the past and transform the future.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



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

October 22, 2021

TRANSMITTED ELECTRONICALLY

Glenn Elliott
Director Environmental Program Office
Department of Veterans Affairs Construction
& Facilities Management
425 I Street NW
Washington, DC 20001

RE: Rawiga Golf & Swim Club
General Correspondence
PWS ID # OH5243012
Medina County

Subject: Ohio Western Reserve National Cemetery Expansion NEPA EA Scoping
10353 Rawiga Road, Seville, Ohio

Dear Glenn Elliott:

We received your request for information dated September 28, 2021 regarding Rawiga Golf and Swim Club. Currently, the site is an active public water system. Should the VA take ownership of the site, the VA would be in responsible charge of the public water system and thereby need to comply with the requirements associated with the public water system and compliance. This would include sampling, fees and potentially an operator of record requirement.

Documents related to this site are posted on our public eDocument search web page at:
<https://epa.ohio.gov/dir/publicrecords>

At this time, we will not be issuing hard-copy mail. This letter is an official response from Ohio EPA that will be maintained as a public record. If you have any questions, please contact Laurel Ljubi from the Division of Drinking and Ground Waters at (330) 963-1182.

Sincerely,

Kurt M. Princic

Kurt M. Princic
District Chief
Northeast District Office

KMP/ams

ec: Jason Sturm, VA Environmental Engineer
Laurel Ljubi, Ohio EPA, NEDO, DDAGW
Aaron Mueller, Ohio EPA, NEDO, DDAGW



BOARD OF COUNTY COMMISSIONERS
RON AMSTUTZ • REBECCA S. FOSTER • SUE A. SMAIL

October 26, 2021

Wayne County Commissioners
428 West Liberty Street
Wooster, Ohio 44691

RE: Ohio Western Reserve National Cemetery Expansion NEPA EA Scoping

To Whom It May Concern,

Upon review of the stakeholder letter received on September 28th, 2021, it was observed that when describing the six-acres located in Milton Township, a parcel of less than one half acre for storage was described. This half acre parcel does not exist. Per the Wayne County Subdivision Regulations, minimum parcel size is 1.25-acres outside the road-right-of-way.

Please be advised that the Wayne County Planning Department cannot approve the creation of the proposed one half acre lot unless a variance granted by the Wayne County Planning Commission is first approved.

Please contact me with questions or if additional information is required.

Sincerely,

Pete Wearstler

Director

Wayne County Planning Department | 330-287-5420

wayne  **ONWARD**
celebrating our past, planning our future



EASTERN SHAWNEE CULTURAL PRESERVATION DEPARTMENT

70500 East 128 Road, Wyandotte, OK 74370

November 8, 2021

Department of Veterans Affairs

4251 I Street, NW

Washington, DC 20001

RE: *Ohio Western reserve National Cemetery Expansion NEPA Scoping, Multiple County, Ohio*

Dear Mr. Sturm,

The Eastern Shawnee Tribe has received your letter regarding the above referenced project(s) within Multiple County, Ohio. The Eastern Shawnee Tribe is committed to protecting sites important to Tribal Heritage, Culture and Religion. Furthermore, the Tribe is particularly concerned with historical sites that may contain but not limited to the burial(s) of human remains and associated funerary objects.

As described in your correspondence, and upon research of our database(s) and files, we find our people occupied these areas historically and/or prehistorically. However, the project proposes **NO Adverse Effect** or endangerment to known sites of interest to the Eastern Shawnee Tribe. Please continue project as planned. However, should this project inadvertently discover an archeological site or object(s) we request that you immediately contact the Eastern Shawnee Tribe, as well as the appropriate state agencies (within 24 hours). We also ask that all ground disturbing activity stop until the Tribe and State agencies are consulted. Please note that any future changes to this project will require additional consultation.

In accordance with the NHPA of 1966 (16 U.S.C. § 470-470w-6), federally funded, licensed, or permitted undertakings that are subject to the Section 106 review process must determine effects to significant historic properties. As clarified in Section 101(d)(6)(A-B), historic properties may have religious and/or cultural significance to Indian Tribes. Section 106 of NHPA requires Federal agencies to consider the effects of their actions on all significant historic properties (36 CFR Part 800) as does the National Environmental Policy Act of 1969 (43 U.S.C. § 4321-4347 and 40 CFR § 1501.7(a)). This letter evidences NHPA and NEPA historic properties compliance pertaining to consultation with this Tribe regarding the referenced proposed projects.

Thank you, for contacting the Eastern Shawnee Tribe, we appreciate your cooperation. Should you have any further questions or comments please contact our Office.

Sincerely,

Paul Barton, Tribal Historic Preservation Officer (THPO)

Eastern Shawnee Tribe of Oklahoma

(918) 666-5151 Ext:1833

APPENDIX C – SECTION 106 AND NATIVE AMERICAN TRIBE CORRESPONDENCE



DEPARTMENT OF VETERANS AFFAIRS
NATIONAL CEMETERY ADMINISTRATION
WASHINGTON DC 20420

March 21, 2022

Burt Logan
Executive Director & CEO, Ohio History Connection
State Historic Preservation Officer
800 E. 17th Ave.
Columbus, OH 43211-2474
614.298.2000 / Fax 614.297.2037
shpo@ohiohistory.org
www.ohiohistory.org/shpo

Re: Initial Cultural Resource Impact Prediction Study for the Proposed Acquisition, Development, and Operation of Approximately 156 Acres of Land to Expand the Existing Limits of the Ohio Western Reserve National Cemetery, Seville, Medina County, Ohio

Dear Mr. Logan,

Pursuant to Section 106 of the National Historic Preservation Act (54 USC 306108), the Ohio Western Reserve National Cemetery of the U.S. Department of Veterans Affairs (VA), National Cemetery Administration (NCA) is initiating Section 106 consultation with your office on implementation of the above-referenced project. VA is considering expanding this property in Medina County.

Property Description

The 156-acre proposed acquisition parcel is in Medina County, Ohio (Figure 1 and 2). This area is in northern Ohio, approximately 45 miles south of Cleveland. The parcel is the Rawiga Golf Course, an active, 18-hole public golf course addressed at 10353 Rawiga Road, Seville, Ohio. It is located along the Medina/Wayne County border, immediately south of the existing OWRNC.

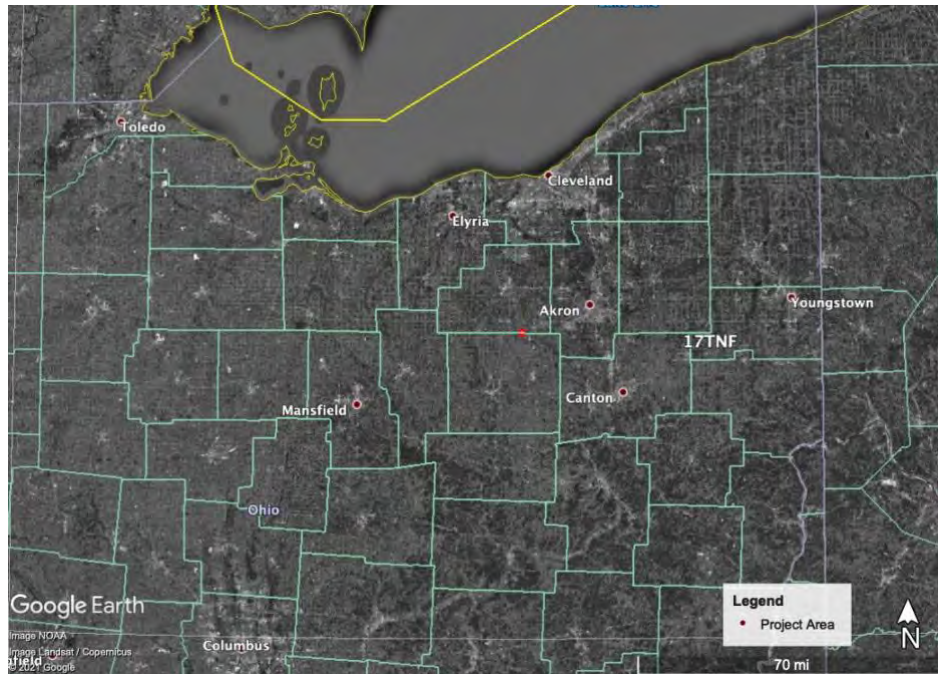


Figure 1 Project Area

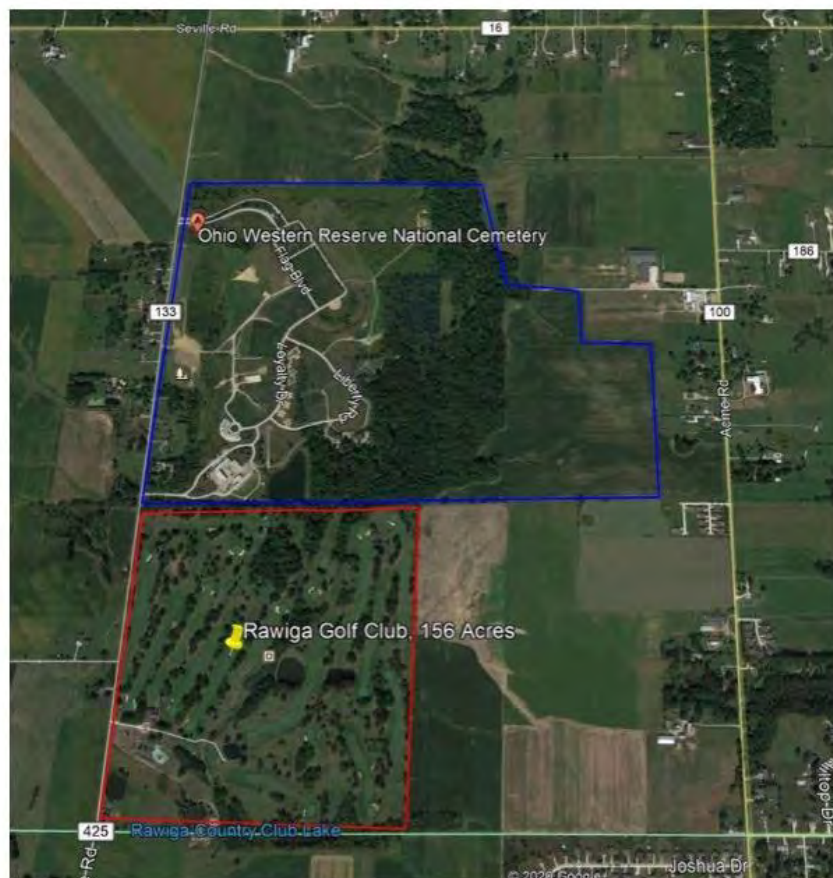


Figure 2 Aerial Photograph of the Existing Ohio Western Reserve National Cemetery and the Rawiga Golf Course Proposed Acquisition Area

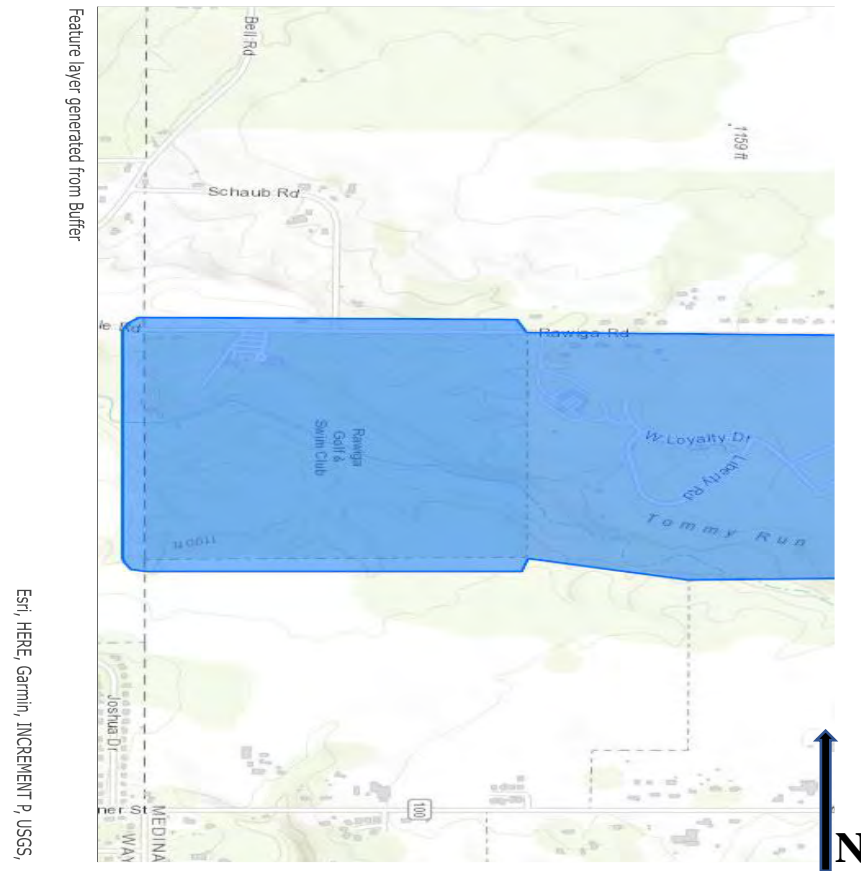


Figure 3 Map of the Area of Potential Effect, shaded in blue.

See Appendix A for additional photos of the parcel and the surrounding area.

Brief History of Property and Study Area

The project area is in the Connecticut Western Reserve lands, land in present-day northern Ohio that was claimed by Connecticut and sold to the Connecticut Land Company in 1795.¹ This parcel is in a largely agricultural area. It is bordered on the east, south, and west by agricultural fields, and on the north, the OWRNC. The golf course was constructed in 1959, designed by noted golf course architect E. Lawrence Packard.² Aerial photography from the period prior the construction of the golf course reveals that the parcel was entirely agricultural, with a residence located on the southwest corner. This building and its outbuildings were demolished during the construction of the course, between 1960-65.³ A review of the historic aerials and maps shows the course has not changed significantly through its lifetime.

Undertaking

¹ From Ohio History, available online at https://ohiohistorycentral.org/w/Western_Reserve, accessed 7/19/2021.

² *NEED CITATION*

³ Aerial photographs provided by Historical Information Gatherers, available online at <http://www.historicalinfo.com/>. Provided by TTL Associates, Inc.

The proposed project is the acquisition and subsequent development of additional acreage for the OWRNC. However, as the existing OWRNC was only constructed in 2000, and the Phase III of development is just underway, development of this parcel into a part of the cemetery is not anticipated before 2032-2042. Specific plans for the development were not provided; for the purposes of this ICRIP, it was assumed development typical of other National Cemeteries, including in-ground burials with standard NCA markers, columbaria, chapel, and/or the construction of support buildings that do not exceed a single story in height. Additional utilities are also anticipated.

Area of Potential Effects

The recommended APE for this undertaking encompasses the existing limits of the OWRNC, as well as the proposed acquisition parcel plus a 150-foot buffer around the proposed acquisition parcel, to account for potential indirect effects due to the construction of above-ground features (Figure 2). Ground disturbance is anticipated to be limited to the boundaries of the parcel. The parcel is separated from the OWRNC by a dense thicket, and by properties to the west by Rawiga Road.

Historic Properties

In June 2021, an architectural historian who meets the *Professional Qualification Standards* for History and Architectural History established by the Secretary of Interior conducted a reconnaissance survey and historic research to identify properties within the APE that are more than fifty years of age and that retain sufficient integrity to warrant listing in the NRHP.

Identification efforts for this ICRIP included a walking survey of the identified acquisition parcel and limited walking survey and windshield survey of the APE and surrounding area. Images of the following properties are available in Appendix A.

Historic Buildings

There are no listed or eligible historic buildings in the APE. There are several buildings and structures associated with the Rawiga Country Club. The clubhouse is 2 story building clad in wood siding, developed into a clubhouse in 1959. It incorporates the barn that was on the property when it was purchased by a group of original members to convert into a golf course and clubhouse (see Figures 5 & 6). It is surrounded by a large, covered porch on three sides that was added between 1973-1985.⁴ The pro shop area, a single-story addition built on the south façade of the original structure, was built between 1973-1982.⁵ The building is modest, with bathrooms, offices, and a large, open dining area on the first floor. On the second floor, there is another large dining area, a modest bar, a commercial kitchen, and unfinished storage. Although the upstairs area is clearly designed for hosting catered celebrations, according to the club manager, the event business is impeded by the fact that the township does not allow liquor sales.⁶ The attic is unfinished and inaccessible. This main building has been changed significantly over time; few of the finishes are original, wood siding covers the original brick façade, and the porch appears to

⁴ Aerial photographs provided by Historical Information Gatherers, available online at <http://www.historicalinfo.com/>. Provided by TTL Associates, Inc.

⁵ Aerial photographs provided by Historical Information Gatherers, available online at <http://www.historicalinfo.com/>. Provided by TTL Associates, Inc.

⁶ Personal communication, Bill Colianni, July 13, 2021.

Building Sketch - Card Number 001

CONCESSION STAND 13

PIC SHELTER 14

POOL 12

BATH HOUSE 10 11 CNPY

PIC SHLTR 15

Cnpy (Upper) 128

MStp 76

1 s FrMas

2 s Fr

1-1/2 s Fr

4394

3752

PRO SHOP

PAVING 9

CLUB HOUSE

SEC 4 48SF + 382 SF

⁷ Aerial photographs provided by Historical Information Gatherers, available online at <http://www.historicalinfo.com/>. Provided by TTL Associates, Inc.

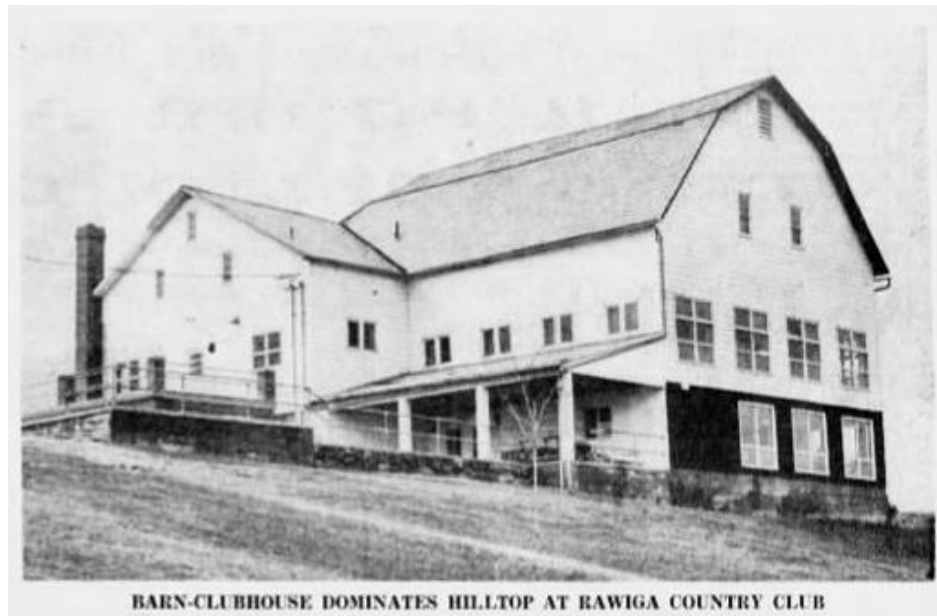


Figure 5 Original barn/clubhouse, looking northwest. Compared to Figure 6, same building in contemporary photo, looking north.



Figure 5 Existing Clubhouse, view looking north; original barn roof can be seen. Pro shop in the foreground right is an addition, as are the enclosed porches.



Figure 6 Clubhouse looking west from the course.

In addition to the main clubhouse building, the property has a pool and bathhouse with a concession stand, and two storage sheds (ca. 1967). The pool is slated for demolition by the current owners; the fate of the pool support buildings is undetermined at this time. In the maintenance area, there are five shed/barn/utility buildings. On the course, there are a few small wooden stream crossings, and a bathroom/shelter. None of these buildings are individually eligible for the NRHP. Even if the golf course is eligible, these buildings would not contribute.

In addition to the buildings in the project area, there are three additional residences located within the APE.

10427 Rawiga Road (1952)

The residence at 10427 Rawiga Road is a small, one and a half story structure that dates from 1952. There are multiple claddings on the exterior, including vinyl siding, brick, and faux stone siding. The front façade features an entrance door shrouded by a closed porch that features a porthole window. The two six-over-six windows appear to be vinyl replacements. A side-gabled roof is split by a small cross-gabled roof over the entry porch. The building has fully finished attic and basement.



Figure 7 10427 Rawiga Road, view looking southeast.

10437 Rawiga Road (1942)

10437 Rawiga Road is a minimal traditional one and a half story residence that closely resembles the plan of its northern neighbor, 10427 Rawiga Road. The front façade features a centered entrance, projected from the main exterior wall. The windows on the front façade appear to be replacement vinyl one-over-one openings. The building has a finished basement. A covered screened-in porch protrudes from the southern façade. A premanufactured shed/barn is located on the southern edge of the property.



Figure 8 10437 Rawiga Road, view looking east.



Figure 9 Barn associated with 10437 Rawiga Road, looking east.

10330 Rawiga Road (1973)

This residence was constructed in 1973. It is a modest single-story ranch home that is clad in brick. A large, two car garage dominates the right (north) side of the front façade. A central set-back front porch stretches from the garage to the two symmetrical windows on the left (south) side of the façade. The front door is located on the left side of the porch, immediately next to the large triple-paned bay window. The south façade contains two vertical double-paned windows. According to the county tax assessor site, the building has a full basement.⁸ Two small premanufactured sheds are also on the site, built in 1995 and 2015.

⁸ Medina County, Ohio GIS system, available online at <http://gm.medinaco.org>. Accessed on 7/19/2021.



Figure 10 10330 Rawiga Road, view looking northwest.



Figure 11 10330 Rawiga Road, view looking west.

None of these homes possess the qualities of significance to be individually eligible. Similarly, none of the outbuildings appear to be individually eligible, nor do any appear to be eligible farmsteads.

Cemeteries

As noted above, the Ohio Western Reserve National Cemetery was established in 2000. The cemetery now encompasses approximately 65 acres, but the cemetery third phase is underway, and eventually the OWRNC will include the adjacent ca. 200 acres that the National Cemetery Association currently owns. The OWRNC is not listed on the NRHP. However, the National Park Service determined that all national cemeteries are eligible for inclusion in the NRHP as “significant places of burial and commemoration” regardless of age. Therefore, the entirety of the developed portion of the OWRNC is eligible for inclusion in the NRHP.⁹ Photos of the OWRNC are Figures 28-33, Appendix A.

Archaeological Sites Previously Identified

The records of the OH SHPO indicate there are 17 archaeological sites in the recommended APE. All these sites were identified during a Phase I survey of the current cemetery; no sites are located on the current parcel. This survey, conducted in 1993, included two derelict barns and one historic foundation that were recorded as archaeological sites. The fourteen other archaeological were all prehistoric scatters that were determined not eligible for the NRHP. Both existing barns were assessed as “possibly eligible.” One of these barns is no longer extant. The other barn is located on private property not associated with the Rawiga Golf Course, and it could not be determined if it still stood, because it was not visible from the public right-of-way.

Table 1 Previously Identified Sites

SITE NUMBER	AFFILIATION	NRHP Eligible
ME0290	Prehistoric	Undetermined
ME0291	Prehistoric	Undetermined
ME0292	Prehistoric	Undetermined
ME0293	Prehistoric	Undetermined
ME0294	Prehistoric	Undetermined
ME0295	Prehistoric	Undetermined
ME0296	Prehistoric	Undetermined
ME0297	Prehistoric	Undetermined
ME0298	Prehistoric	Undetermined
ME0299	Prehistoric	Undetermined
ME0300	Prehistoric	Undetermined
ME0301	Prehistoric	Undetermined
ME0302	Prehistoric	Undetermined
ME0303	Prehistoric	Undetermined
ME0304	Historic	Undetermined
ME0305	Historic	Undetermined
ME0306	Historic	Undetermined

⁹ National Register Eligibility of National Cemeteries – A Clarification of Policy – A Clarification of Policy, National Park Service, September 8, 2011. Available online at https://www.nps.gov/subjects/nationalregister/upload/Final_Eligibility_of_VA_cemeteries_A_Clarification_of_Policy_rev.pdf (Accessed 7 May 2021).

Figure 12 Table of all identified archaeological sites in the APE

Phase I Archaeological Survey

Ohio Valley Archaeology, Inc. (OVAI) completed a Phase I archaeological survey of an approximately 153-acre area for the Western Reserve National Cemetery Expansion Project. The Phase I archaeological survey consisted of pedestrian reconnaissance and shovel testing, with intervals determined according to High, Moderate, and Low probability zones previously designated by the Ohio State Historic Preservation Office (SHPO) and Environmental Research Group, Inc. (ERG) and provided in the Final Statement of Work CLIN 0002AT from ERG. A total of 474 shovel test pits (STPs) were excavated within the project area and subsurface disturbance was noted throughout, likely related to earthmoving activities from the golf course construction. One archaeological site, 33Me456, was identified in the southwest corner of the project area. Site 33Me456 is represented by an artifact scatter (primarily kitchen and architectural group artifacts) associated with the mid-nineteenth century main barn (modified into the present golf clubhouse). Temporally, many of the ceramics are broadly datable from the mid-nineteenth through early twentieth centuries. These artifacts were likely associated with the demolition of the farm complex and subsequent construction activities. No discrete, intact cultural layers or features were encountered. Artifact density is relatively low, and the site has experienced continuous use into the present. No other cultural materials were encountered within the project area.

In summary, site 33Me456 lacks temporal and physical integrity and is recommended 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 this survey, no further archaeological work is recommended for the project area. For the full report on the archaeological Phase I, please see Appendix B.

Historic Landscapes

The records of the OH SHPO indicate there are no historic landscapes in the recommended APE. However, because the golf course could be a historic landscape, a Determination of Eligibility for the Rawiga Golf Course was conducted. It is NCA's determination that based on the lack of evidence tying all 18 holes to Mr. Packard, the lack of his signature design elements, and the diminution of design integrity, that the Rawiga Golf Course is not eligible for listing in the NRHP (Appendix C).

Traditional Cultural Properties

The records of the OH SHPO indicate there are no traditional cultural properties in the recommended APE. It should be noted, however, that this study did not include a TCP study.

Effects on Historic Properties

Based on the pedestrian building survey and the Phase I archaeological survey (Appendix B), and the Rawiga Golf Course Determination of Eligibility (Appendix C), both of which found there are no historic properties present within the APE, NCA recommends a finding of no historic properties affected pursuant to 36 CFR 800.4(d)(1) is appropriate for the proposed undertaking. NCA requests the SHPOs concurrence on the agency's finding per 36 CFR Part 800. NCA is also contacting the federally recognized Native American Tribes and other interested parties listed in Table 2 below, to determine if any organizations have any additional

information about potential historic properties that may be affected by the undertaking and presenting the results of the archaeological survey. If the parties do submit additional information, NCA will review the provided documentation to determine if the resource (1) meets the criteria for listing in the NRHP and (2) would be adversely affected by the proposed undertaking. All parties will be invited to consult.

Table 2 List of Invited Consulting Parties

Ohio State Historic Preservation Office	Resource Protection and Review Department	800 E. 17th Avenue Columbus, OH 43211-2474	*Do not submit via email*
Medina County Historical Society	Brian Feron, President	206 North Elmwood Street, Medina, Ohio 44256	mchs@zoominternet.net
Diamond Golf Group LLC	Robert M. Taub, Diamond Golf Group, LLC	10353 Rawiga Rd Seville, OH 44273	Robert M. Taub rmt3661@yahoo.com
Northern Ohio Golf Association	Robb Schulze, PGA Chief Executive Officer	Wharton Golf Center at North Olmsted Golf Club, One Golfview Lane, North Olmsted, OH 44070	rschulze@noga.org
Forest County Potawatomi Community of Wisconsin	Michael LaRonge, THPO	P.O. Box 340 Crandon WI 54520	Michael.LaRonge@FCP otawatomi-nsn.gov
Seneca-Cayuga Nation	William Tarrant, THPO	PO Box 453220 Grove OK 74345	wtarrant@sctribe.com
Wyandotte Nation	Sherri Clemons, THPO	64700 East Highway 60 Wyandotte OK 74370	sclemons@wyandottenation.org
Seneca Nation of Indians	Rickey Armstrong, Sr., President	90 Ohiyo Way Salamanca NY 14779	Charisse.ground@sni.org
Ottawa Tribe of Oklahoma	Rhonda Dixon, THPO	13 South 69A Miami OK 74355	rhonda.oto@gmail.com
Eastern Shawnee Tribe of Oklahoma	Brett Barnes, THPO	12705 S. 705 Road Wyandotte OK	bbarnes@estoo.net
Miami Tribe of Oklahoma	Diane Hunter, THPO	PO Box 1326 Miami OK 74355	dhunter@miamination.com
Hannahville Indian Community, Michigan	Kenneth Meshigaud, Chairperson	N14911 Hannahville B1 Road Wilson MI 49896	tyderyien@hannahville.org
Absentee-Shawnee Tribe of Indians of Oklahoma	Devon Frazier, THPO	2025 South Gordon Cooper Drive Shawnee, OK 74801	106NAGPRA@astribe.co

Citizen Potawatomi Nation	Kelli Mosteller, THPO	1601 S. Gordon Cooper Drive Shawnee, OK 74801	kelli.mosteller@potawato rg
Delaware Nation	Nekole Alligood, Director of Cultural Resources & Section 106	PO Box 825 Anadarko, OK 73005	Nalligood@delawarenatiom
Delaware Tribe of Indians	Dr. Brice Obermeyer, Historic Preservation	1 Kellog Circle Emporia, KS 66801	bobermeyer@delawaretribg
Peoria Tribe of Indians of Oklahoma	Craig Harper, Chief	PO Box 1527 Miami, OK 74355	Chiefharper@peoriatribe.c
Pokagon Band of Potawatomi	Matthew Bussler, THPO	PO Box 180 Dowagiac, MI 49047	matthew.bussler@pokago nd-nsn.gov
Prairie Band Potawatomi Nations	Thomas Wabmum, THPO	16281 Q Road Mayetta, KS 66509	thomaswabmum@pbnati org
Shawnee Tribe	Benjamin Barnes, Chief	29 South Highway 69A Miami, OK 74355	rondede@gmail.com
Tonawanda Nation	Roger Hill, Chief	7027 Meadville Road Basom, NY 14013	tonseneca@aol.com
Turtle Mountain Band of Chippewa Indians	Jeffrey Desjarlais, Tribal Historic Preservation Officer	PO Box 900 Belcourt, ND 58316	

NCA will notify your office and proceed in accordance with 36 CFR § 800.5-800.6 should any consulting parties provide additional information concerning unidentified historic properties potentially affected by this undertaking. If you have any questions contact Mr. William Edward Hooker at William.hooker@va.gov, 202-632-6631.

Sincerely,

W. Edward Hooker, III
Historic Architect/Cultural Resources Manager
National Cemetery Administration
Design and Construction Service

CC: Héctor M. Abreu-Cintrón, VA Federal Preservation Officer

Appendix A: Photographs of the Proposed Project Area



Figure 1 Covered porch added ca. 1973, facing south.



Figure 2 Added covered porch, facing east.



Figure 3 Front facade of the clubhouse, view looking southeast.



Figure 4 Pool, bathhouse (right), concession stand (left), view looking southeast.



Figure 5 Concrete block garage, located in the maintenance area, view looking north.



Figure 6 Lean-to shed in maintenance area, view looking west.



Figure 7 Large storage barn, wood and tin, in maintenance area, view looking west.



Figure 8 Pesticide storage shed in maintenance area, view looking west.



Figure 9 Prefabricated storage shed (post-2000), metal-clad, in maintenance area, view looking northwest.



Figure 10 Aerial photograph of the original barn configuration, 1957.



Figure 11 Original configuration of the barn-turned-clubhouse, 1960.



Figure 12 Clubhouse with added covered porches is visible by 1985.



Figure 13 Current aerial of the clubhouse configuration (Google Earth, Photo 8/20/2020, accessed 7/21/2021).



Figure 14 Second hole fairway and cart path, facing north.



Figure 15 Third hole fairway and cart path, facing north.



Figure 16 Fourth hole tee and cart path, facing north.



Figure 17 Fourth hole fairway, facing east.



Figure 18 Fifth hole fairway looking east.



Figure 19 Sixth hole fairway and cart path, facing north. Tree line in the background is the south end of the existing cemetery grounds; east crops are the eastern border of the proposed acquisition parcel.



Figure 20 Seventh hole fairway, looking northwest.



Figure 21 Eighth hole green and cart path, looking west.



Figure 22 Ninth fairway, looking west at the eastern facade of the clubhouse.



Figure 23 Fourteenth fairway looking east.



Figure 24 Well-fed water fountain on 14th hole, appears to date to early golf course period, facing north.



Figure 25 Sixteenth fairway and green, looking north.



Figure 26 17th tee box, looking west at rear of clubhouse.

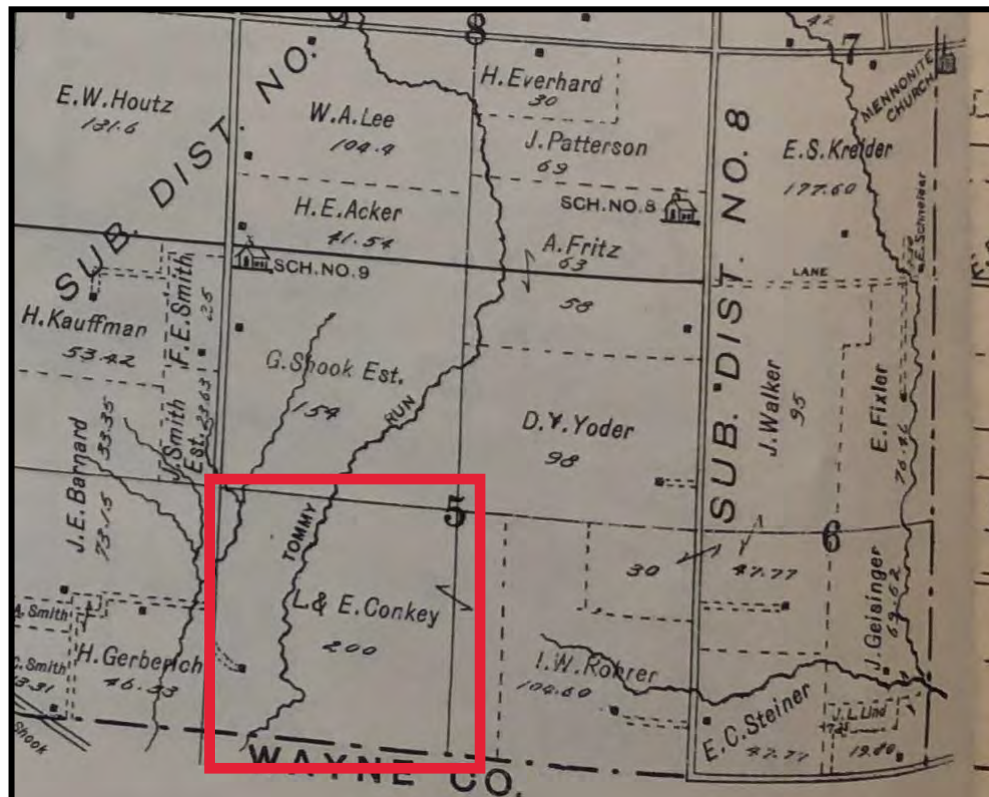


Figure 27 1897 Medina County Atlas, proposed project area in red.



Figure 28 Headstones in the northern section of the Ohio Western Reserve National Cemetery, looking northwest.



Figure 29 Photograph of part of the flag plaza, looking north at Phase 3 development of the OWRNC.



Figure 30 View northwest along the parade ground from the flag plaza.



Figure 31 Headstones southeast of the columbarium.



Figure 32 Gravestones in section 19 of the OWRNC, looking northeast.



Figure 33 Ongoing work at the OWRNC, looking northwest.

**Appendix B: Phase I Archaeological Survey
for the 153-Acre Western Reserve National
Cemetery Expansion Project in Seville, in
Medina and Wayne Counties, Ohio**

February 2, 2022

Phase I Archaeological Survey for the
153-Acre Western Reserve National
Cemetery Expansion Project in Seville, in
Medina and Wayne Counties, Ohio.

Prepared for: Environmental Research Group, LLC.

Stacy M. Dunn, PhD, RPA,
Jessica L. Clark, MA, RPA,
and
Shelby N. Frideger



OVAI Project #2021-50

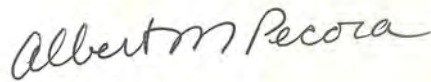
Phase I Archaeological Survey for the 153-Acre Western Reserve National Cemetery
Expansion Project in Seville, in Medina and Wayne Counties, Ohio.

Prepared for:

Environmental Research Group, LLC
6049 Falls Road
Baltimore, MD, 21209

Prepared by:

Stacy M. Dunn, PhD, RPA,
Jessica L. Clark, MA, RPA,
and
Shelby N. Frideger



Albert M. Pecora Ph.D., RPA
Principal Investigator
February 2, 2022

Ohio Valley Archaeology, Inc
4889 Sinclair Road Suite 210
Columbus, Ohio 43229

OVAI

www.ovaigroup.com

MANAGEMENT SUMMARY

Ohio Valley Archaeology, Inc. (OVAI) completed a Phase I archaeological survey of an approximately 153-acre area for the Western Reserve National Cemetery Expansion Project in Seville, in Medina and Wayne Counties, Ohio. The Phase I survey is intended to fulfill requirements under Section 106 of the National Historic Preservation Act (NHPA). The following report includes a cultural resource records review, a historical map and aerial photograph review, and the results of a Phase I archaeological survey.

The project area is approximately 153-acres in size and located 3.4 km (2.1 mi) northwest of the city center of Rittman and 4.3 km (2.7 miles) southeast of Seville, Ohio. It is the grounds of the Rawiga Golf and Swim Club, immediately south of the Western Reserve National Cemetery. Overall, the area consists of wooded slopes and manicured lawns for tees, greens, and fairways. The area is bisected by the Tommy Run drainage, and is surrounded by a combination of agricultural fields, woods, and scattered residences.

The cultural resource records review for this project found several previously recorded archaeological sites (OAI), historic-era buildings and structures (OHI), two National Register of Historic Places (NRHP) listed properties, and cemeteries within 3.0 km (1.9 miles) of the project area. Several pre-contact artifact scatters had been previously identified immediately north of the present project area during due diligence surveys for the current National Cemetery. A review of historic maps and aerial photographs indicated that the project area was formerly agricultural land with a farm complex present from the mid-nineteenth through the early twenty-first century in the southwestern corner. The project area was converted to a golf course in 1959 and the farm complex was significantly altered over the following decades. The residence was demolished by 1973, outbuildings were removed, and new ones added between 1960 and 2001, and the main barn was modified and currently serves as the golf clubhouse. The overall vicinity is primarily agricultural with minor residential development over the past century.

The Phase I archaeological survey consisted of pedestrian reconnaissance and shovel testing, with intervals determined according to High, Moderate, and Low probability zones previously designated by the Ohio State Historic Preservation Office (SHPO) and Environmental Research Group, Inc. (ERG) and provided in the Final Statement of Work CLIN 0002AT from ERG. A total of 474 shovel test pits (STPs) were excavated within the project area and subsurface disturbance was noted throughout, likely related to earthmoving activities from the golf course construction. One archaeological site, 33Me456, was identified in the southwest corner of the project area. Site 33Me456 is represented by an artifact scatter (primarily kitchen and architectural group artifacts) associated with the mid-nineteenth century main barn (modified into the present golf clubhouse). Temporally, many of the ceramics are broadly datable from the mid-nineteenth through early twentieth centuries. These artifacts were likely associated with the demolition of the farm complex and subsequent construction activities. No discrete, intact cultural layers or features were encountered. Artifact density is relatively low, and the site has experienced continuous use into the present. No other cultural materials were encountered within the project area.

In summary, site 33Me456 lacks temporal and physical integrity and is recommended 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 this survey, no further archaeological work is recommended for the project area. Based on these identification efforts, a finding of no historic properties affected pursuant to 36 CFR 800.4(d)(1) is recommended.

TABLE OF CONTENTS

Management Summary	i
List of Figures	iii
List of Tables	iv
Introduction.....	1
Project Setting	1
Physiography, Relief, and Drainage.....	1
Geology	8
Soils.....	8
Historical Background	10
Prehistory	10
History.....	11
Medina County History	11
Wayne County History.....	12
Historical Map and Aerial Photograph Review	14
Previously Recorded Cultural Resources.....	21
Phase I Archaeological Survey	25
Archaeological Field Methods	25
Archaeological Survey Results	29
High Potential Probability Zones	35
Moderate Potential Probability Zone.....	37
Low Potential Probability Zones	38
Pedestrian Reconnaissance Zone.....	40
Archaeological Site Description.....	44
33Me456.....	44
Conclusions and Recommendations	49
References.....	50
Appendix A. Artifact Inventory for Site 33Me456.....	55
Appendix B. Shovel Test Inventory.....	61
Appendix C. OAI Form for Site 33Me456	106

LIST OF FIGURES

Figure 1: Ohio Department of Transportation map – <i>Medina County</i> (1999) showing the general project location.	3
Figure 2: The 1961 (PR 1978) <i>Rittman, Ohio</i> 7.5' Series USGS topographic quadrangle map showing the project area.	4
Figure 3: Modern (2020) Google Earth aerial image showing the project area.	5
Figure 4: Overview of clubhouse, facing northeast.	6
Figure 5: Overview of main course near clubhouse, facing east.	6
Figure 6: Overview of north portion of course, facing northwest.	7
Figure 7: Woods and pond in central portion of course, facing north.	7
Figure 8: 2020 Google Earth aerial image with USDA-NRCS Web Soil Survey data for the project area.	9
Figure 9: Historical timeline for the Ohio region.	10
Figure 10: <i>Combination Atlas Map of Medina County, Ohio</i> (Everts 1874) showing the project area.	16
Figure 11: The 1901 (1961 ed.) <i>Wooster, Ohio</i> 15' Series USGS topographic quadrangle map showing the project area.	17
Figure 12: 1952 USGS aerial photograph showing the project area.	18
Figure 13: 1960 USGS aerial photograph showing the project area.	19
Figure 14: 1994 Google Earth aerial image showing the project area.	20
Figure 15: Ohio 7.5 Minute Series USGS topographic quadrangle from the SHPO's online GIS database.	22
Figure 16: Probability zone map from the Final Statement of Work from ERG.	26
Figure 17: Topographic contour map of fieldwork within the project area.	27
Figure 18: Photo location map of figures in this report.	28
Figure 19: Overview of central section of course, facing north.	30
Figure 20: Tommy Run with drainage pipes and bridge, facing northeast.	30
Figure 21: Central pond in project area, facing northeast.	31
Figure 22: Wetland in north-central portion of project area, facing north.	31
Figure 23: Typical wooded slope within project area, facing north.	32
Figure 24: Typical tree-lined fairway on course, facing west.	32
Figure 25: Pavilion, pool facility, and outbuildings near clubhouse, facing southeast.	33
Figure 26: Maintenance and storage buildings in southeast corner of project area, facing northwest.	33

Figure 27: Typical STP profile.	34
Figure 28: Wooded slope in High Potential probability zone in the northern part of the project area, facing north.	35
Figure 29: High Potential probability zone adjacent to clubhouse, facing southwest.	36
Figure 30: Moderate Potential probability zone, facing northwest.	37
Figure 31: Low Potential probability zone in eastern portion of project area, facing southwest.	38
Figure 32: Low Potential probability zone in northern portion of project area, facing south.	39
Figure 33: Pedestrian reconnaissance zone in northwest corner of project area, facing southeast.	40
Figure 34: Pedestrian reconnaissance zone along southern boundary of project area, facing west.	41
Figure 35: Pedestrian reconnaissance zone in northeast corner of project area, facing north.	41
Figure 36: Pedestrian reconnaissance zone in central portion of project area, facing northwest.	42
Figure 37: The 1961 (PR 1978) <i>Rittman, Ohio</i> 7.5' Series USGS topographic quadrangle map showing the project area and site 33Me456.	43
Figure 38: Detailed topographic map of site 33Me456.	46
Figure 39: Overview of site 33Me456, facing east.	47
Figure 40: Select artifacts (decorated ceramics) from site 33Me456.	47

LIST OF TABLES

Table 1: USDA Web Soil Survey data for the project area.	9
Table 2: Selection of the maps and aerials reviewed for this report.	15
Table 3: Previously documented OAIs within 1.0 km (0.6 mi) of the project area.	23
Table 4: Previously documented OHIs within 3.0 km (1.9 mi) of the project area.	23
Table 5: NRHP listings/properties within 3.0 km (1.9 miles) of the project area.	24
Table 6: OGS cemeteries within 3.0 km (1.9 miles) of the project area.	24
Table 7: Shovel tests by probability zone, modified from the Final Statement of Work from ERG.	25
Table 8: Summary of artifacts from site 33Me456.	48
Table 9: Summary of diagnostic ceramic artifacts and production date ranges from 33Me456.	48

**Appendix C: a Determination of Eligibility for
the Rawiga Golf Course.**

Determination of Eligibility, Rawiga Golf Course

The U.S. Department of Veterans Affairs (VA), and the National Cemetery Administration (NCA) in Seville, Ohio is considering acquisition of a parcel for the purposes of expanding the existing Ohio Western Reserve National Cemetery (OWRNC) in Seville, Ohio. The 156-acre proposed acquisition parcel is in Medina County, Ohio (Figure 1). This area is in northern Ohio, approximately 45 miles south of Cleveland. The parcel is the Rawiga Golf Course, an active, 18-hole public golf course addressed at 10353 Rawiga Road, Seville, Ohio. The course, the central feature of the Rawiga Golf Club, is located along the Medina/Wayne County border, immediately south of the existing OWRNC. This document is an analysis of the Rawiga Golf Course in order to determine if the property is eligible for listing in the National Registrar of Historic Places (NRHP) as a historic landscape under 36 CFR §800.4. In particular, the golf course will be evaluated as a designed recreational landscape, as outlined in National Park Service Bulletin 18, “How to Evaluate and Nominate Designed Historic Landscapes (NPS Bulletin 18).”¹

1. DEFINITION

NPS Bulletin 18 defines a designed historic landscape as “landscape that has significance as a design or work of art; was consciously designed and laid out by a master gardener, landscape architect, architect, or horticulturalist to a design principle, or an owner or other amateur using a recognized style or tradition in response or reaction to a recognized style or tradition; has a historical association with a significant person, trend, event, etc. in landscape gardening or landscape architecture; or a significant relationship to the theory or practice of landscape architecture.”² This guidance also notes that while landscapes may be eligible primarily on the merits of the landscape design, many are also associated with other areas of significance, such as association with an influential landscape architect, innovative environmental practices, or connected buildings or district. Other landscapes may be linked to important historic trends or themes, but these must also be designed landscapes in themselves to warrant eligibility solely as a landscape.

¹ Available online at <https://www.nps.gov/subjects/nationalregister/upload/NRB18-Complete.pdf>.

² NPS Bulletin 18, p. 2.

2. CRITERIA

The Ohio State Historic Preservation Office outlines the criteria for eligibility of a designed landscape:

A historic landscape must have been consciously designed and laid out by a master gardener, landscape architect, or other individual(s) or group(s) working according to the established conventions and styles of gardening and landscape architecture. The landscape should be significant in its own right and not merely as a contemporary setting for a building or group of buildings. Cultural landscapes like the Amish farms of Holmes County should not be confused with a designed historic landscape. Rural farmsteads may be historic but because they usually represent the work of distinct cultural groups they are more properly classified as rural historic districts.³

Since the Rawiga Golf Course was consciously laid out by a noted golf course architect, Edward Lawrence Packard, the Row 10 team consulted with the Ohio State Historic Preservation Office on August 19, 2021, to discuss the elements to be included in this evaluation of eligibility. During that call, SHPO Architectural History Project Review Manager Joy Williams and the Row 10 team, on behalf of the NCA, outlined three key components of the evaluation:

- The importance of E. L. Packard as a landscape and golf architect;
- The continuity of course layout/or landscaping;
- Some innovation related to golf course design or layout.

These components are reviewed below.

3. FIELD WORK AND METHODOLOGY

In July 2021, an architectural historian who meets the *Professional Qualification Standards* for History and Architectural History established by the Secretary of Interior conducted a pedestrian survey and historic research to identify built resources within the APE that are more than fifty years of age and that retain sufficient integrity to warrant listing in the NRHP. Identification efforts for this study included a walking survey of the identified acquisition parcel and baseline survey of the APE and surrounding area.

³ From the Ohio History Connection website, State Historic Preservation Office section, available online at <https://www.ohiohistory.org/preserve/state-historic-preservation-office/hpsurvey/ohio-landscape-inventory>.

4. RESEARCH

a) SOURCES CONSULTED

The search for as much information on the Rawiga Golf Course and Edward Lawrence “Larry” Packard as could be found was thorough, if not completely successful. Materials were obtained from the owners of the club, the Medina County land and tax records, historic aerial and cartographic products, online databases, newspapers, NRHP and Ohio SHPO records, and secondary sources. Inquiries were made to a large number of repositories and individuals to attempt to locate Mr. Packard’s papers, however, they were not located. Sources consulted included:

- United States Golf Association (USGA)
- USGA Golf Museum Media and Research Information
- The Professional Golf Association (PGA)
- The Golf Archives at University of Pennsylvania
- The Innisbrook Golf Resort at Palm Harbor, FL
- Tampa Bay History Center
- American Society of Golf Course Architects (ASGCA) archives
- The University of South Florida Special Collections
- The University of Ohio Special Collections
- The University of Massachusetts at Amherst Special Collections
- The Turfgrass Archives at Michigan State University
- Archives of Golf, Golf Digest, Golf Monthly, Inside Golf, and Sports Illustrated magazines
- The Pinellas County, Florida Clerk of Court records
- Family members of the Packard family (located the daughter of his second wife)
- Newspaper archives
- Secondary sources and online academic journals

b) COURSE HISTORY

The Rawiga Golf Course was established in 1959, according to its own history.⁴ According to a report from 1964 in the Akron Beacon Journal (2/10/64), the idea for a golf course came from a group of eleven

⁴ Rawiga Golf Club website, www.rawigacc.com; Rawiga Golf Club printed material obtained on site.

area men, largely in response to high dues at private golf clubs and long waits for tee times at public courses. The men, including E.L. Stentz, A.A. Manske, C.C. Kunkler, Charles Wald, W.T. Creson, Karl Kohler, Vernon Yoho, R. J. Heames, Melvin Emch, C. R. Culp, and K. E. Glasgow, first discussed the idea for a private golf club of their own on September 23, 1958. Within three weeks, the group had grown to 65 members, and articles of incorporation for the Rawiga Country Club were filed with the Ohio Secretary of State on October 22, 1958.⁵ By the spring of 1959, two hundred charter memberships, at \$200/person, had been sold to finance the venture.⁶

The fledgling group identified a farm between the towns of Rittman and Wadsworth with “terrain ideally suited for a golf course, and a stream running through it.” The small collective decided to name the venture the “Rittman and Wadsworth Incorporated Golf Association,” or Rawiga.⁷ The farm included a large barn and a small farmhouse, and the Rawiga steering committee optioned the property by the beginning of 1959. No mention is made in the evidentiary records to the name of a designer, but one newspaper article indicates that the group commissioned “architects...to lay out the course.”⁸ However, no construction company was hired at the time, but intending to save money, “most of the labor for clearing the land, moving the earth, laying drain pipe, fertilizing and seeing the fairways, preparing the greens, planting trees, and building bridges was done by members.”⁹

Both the Rawiga Golf Course information and secondary source information related to the history of the American Society of Golf Course Architects (ASCGA) indicate that the steering committee hired Edward Lawrence “Larry” Packard to lay out the course.¹⁰ Although the course owners have indicated that the course has always been 18 holes, the documentary evidence indicates that the original layout of the course was nine holes (Figures 2 and 3).¹¹ An aerial photograph from 1957 clearly demonstrates that no construction work had commenced on the property, while by 1960, one can just make out nine greens, all but one on the west side of the Tommy Run creek. However, within just year, the Rawiga group expanded to 18 holes. There is no indication that Packard designed the second nine holes; no documents have been identified to suggest that was the case. In fact, the *The Architects of Golf: A Survey of Golf Course*

⁵ Ohio Secretary of State Business Details and Findings, available online at https://bizimage.ohiosos.gov/api/image/pdf/B070_0044.

⁶ Akron Beacon Journal, February 10, 1964, p. 21, available online at Newspapers.com, accessed July 20, 2021.

⁷ Akron Beacon Journal, 2/10/1964, p. 21.

⁸ Akron Beacon Journal, 2/10/1964, p. 21.

⁹ Akron Beacon Journal, 2/10/1964, p. 21.

¹⁰ Rawiga Golf Club website, www.rawigacc.com; Rawiga Golf Club printed material obtained on site; Cornish and Whitten, *The Architects of Golf: A Survey of Golf Course Design from Its Beginnings to the Present, With an Encyclopedic Listing of Golf Architects and Their Courses*, 1993, “Courses by Edward Lawrence Packard,” p. 364.

¹¹ Personal Communication, Robert Taub, 7/12/2021.

Design from Its Beginnings to the Present, With an Encyclopedic Listing of Golf Architects and Their Courses only lists Packard as the designer for 9 holes.¹²

In 1960, when just the original 9 holes are evident, no fairways, tee boxes, nor planted trees to differentiate the fairways are visible. By 1965 (Figure 4 aerial 1965), the fairways can be seen, as can the full 18 holes. At this time, some connecting cart/walking paths area also visible. No treelines that separate fairways are evident until the 1973 aerial (Figure 5 aerial 1973). An article in 1964 confirms the construction evolution, noting that “the first nine holes were officially opened on May 30, 1959, and the second nine a year later.”¹³

The topographic maps and aerial photographs confirm the advantage of the site selection. The topography of the former farmland is not significantly altered (Figure 6 topo maps). The most significant changes to the landscape are the grading of the fairways and greens, the creation of sand traps and two ponds, and the tree lanes. A 1960 Akron Beacon Journal article also notes the creation of a dam along the county line on the golf course property, “planned as flood prevention and recreation lake in cooperation with the Rawiga Country Club;” the resulting pond/lakes can be seen in the 1973 aerial.¹⁴ The suitability of the land made the original members able to conduct the work themselves, as the terrain simply needed to be styled into a course, rather than a course being fabricated by large geographic alteration.

Rawiga is an example of a classic parkland golf course, courses set apart from links courses common in Great Britain by fairly flat, park-like settings, with a number of trees to break the wind and delineate separate holes. Aerial photography and personal communication with the Rawiga golf staff indicates a fairly static layout since the course transformed to 18 holes. There was a significant amount of work on cart paths in 2008, including the renovation of 148,000 square feet of cart paths, and the reconstruction of 11 sand traps and the addition of three new tees.¹⁵ The western holes, which were the first that were constructed, were originally holes 1-9, but at some point in the 21st century, changed to become holes 10-18.¹⁶ Currently, the course consists of 18 holes with 4 sets of tees, measuring 6,711 yards from the Championship tees, with a par 72. description of the current course circumstances. There aren’t many fixtures or structural elements on the course. There are three bridges and one water fountain that appears

¹² Cornish and Whitten, p. 364-365.

¹³ Akron Beacon Journal, 2/10/1964, p. 21.

¹⁴ Akron Beacon Journal, 6/30/1960, p. 7.

¹⁵ Documentation provided by Rawiga Country Club, online at www.rawigacc.com.

¹⁶ Personal Communication, Robert Taub, 7/12/2021.

to date to the period of construction (Figures 7 and 8 Bridge, Fountain). The pool and maintenance buildings are described in the attached Initial Cultural Resource Impact Prediction Study.

C) EDWARD LAWRENCE “LARRY” PACKARD

Edward Lawrence Packard, universally known as Larry, was born in Northampton, MA in 1912. After graduating the University of Massachusetts (then Massachusetts State College) in 1935 with a degree in landscape architecture.¹⁷ Following graduation, in the midst of the Great Depression, Packard found work with the Resettlement Administration, which designed projects for the Civilian Conservation Corps (CCC). He also worked for the National Park Service in Bar Harbor, Maine; for the McElhenny (Tabasco) Corporation in Louisiana; and the Chicago Park Service, where he worked on O’Hare Airfield. When the war ended, he sought work cold-calling landscape architects listed in the Chicago phone book. In the fall of 1946, he found work with Robert Bruce Harris, a golf course architect. Harris was one of the leaders of the “second wave” of American golf course architects. The pioneers—like Donald Ross, Tom Bendelow, and James Braid—died in the 1930s and ‘40s, leaving a void for the new wave of course designers. Harris was one of the most influential of this new group, called by some the “father of the Chicago school of golf course architecture.”¹⁸ This group was distinguished from other golf course architects of the time by their landscape architecture degrees. According to Paul Fullmer, long-time secretary of the ASGCA, the sole organization for golf course designers, “there were very few landscape architects in the business.”¹⁹ The school’s work also was identified with Harris’s signature engineered elements: “big tees, wide, sweeping fairways, gentle curves and slopes.”²⁰

When Harris first hired Packard, he hadn’t ever played golf. His drafting and survey skills, as well as his education, were valuable to Harris. Packard described his time with Harris as an apprenticeship, where he asked an endless array of golf design questions: “how big should the greens be? Why were there 18 holes, and not 12? How many par-three holes should you make?”²¹ He stayed with Harris until 1954 and worked on 30 golf courses.

When he left the Harris company in 1954, he joined forces with a friend of his wife Dorothy’s family, Brent Wadsworth. Wadsworth was also a landscape architect, who interned with Harris’s company and

¹⁷ Mickey Rathbun, *Double Doglegs and Other Hazards: the Life and Work of Larry Packard*, 2002, p. 47.

Although this is a vanity publishing, it is well-researched.

¹⁸ Rathbun, p. 76.

¹⁹ Ibid.

²⁰ Rathbun, p. 77.

²¹ Rathbun, p. 79.

became close to Packard while he was in the service. Once out of the service, he lobbied Packard to begin their own company, and soon the Packard and Wadsworth Company was formed, seeking any landscaping work they could muster. They opened shop in LaGrange, Illinois, a suburb of Chicago, and soon began to work on post-war suburban development projects. New single-home developments popping up in cornfields and untamed woodlands required landscaping to attract buyers, and Packard and Wadsworth soon gained the acclaim of the Chicago branch of the American Society of Landscape Architects for their model landscape plan for the statewide Plant Illinois program.²² Following this, they took a job creating a public park just south of LaGrange, assisting in the selection of the site, the design of both the landscape and the recreation building, and assisting local leaders in drumming up public support for the project. They also contacted wealthy families listed in the paper as new builders of local mansions to solicit business.²³

But even as Packard and Wadsworth grew their landscaping work, they remained dedicated to becoming golf landscape architects. In 1956, they landed the design for the Skyline Golf Course in Wisconsin, followed by designing two nine-hole courses in 1957, six in 1958 (including one in Ohio), and five new courses in 1959 (four nine-hole, and one 27-hole; two in Ohio). During these early years, Packard began to hone his personal golf design vision, which focused on the enjoyment of the course for all levels of golfers, an emphasis on ease and sustainability of maintenance, and utilizing the natural terrain of a site.

By 1958, the firm split, with Packard becoming Packard Design, while Wadsworth operated construction operations as The Wadsworth Company.²⁴ The division proved prescient, as the golf course industry boomed throughout the 1960s. In the decade between 1950-1959, an average of less than 150 courses were built each year in the US, while between 1960-69, that number increased to around 400 courses per year, as leisure and affluence increased in both urban and suburban areas, and televised golf grew popular.²⁵ In all over 5,500 courses were constructed between 1950-1969, the overwhelming majority coming in the last half of that time period. The U.S. Department of Agriculture's Farmers Home Administration (FmHA) contributed to the expansion of courses, with a program designed to encourage rural recreational facilities development, just as the USDA had developed rural electrification programs the two decades before. From 1963-1975, the FmHA distributed \$10.5 million for projects that included the

²² Rathbun, p. 92.

²³ Rathbun, p. 95.

²⁴ Ibid; Obituary for Brenton Wadsworth, 2018, available online at <https://www.legacy.com/us/obituaries/aurora-beacon-news/name/brenton-wadsworth-obituary?id=19955640>.

²⁵ Napton and Laingen, "Expansion of Golf Courses in the United States," *Geographical Review*, Vol. 98, No. 1 (Jan., 2008), pp. 24-41, available online at JSTOR, <https://www.jstor.org/stable/30034211>.

construction tennis courts, and baseball facilities; Golf-related projects accounted for 566 of those projects, including 1,035 loans disbursed.²⁶

Packard built, redesigned, or added holes to over 300 courses by the time he retired, both in the United States and internationally.²⁷ Undeniably his most widely acclaimed course is the Copperhead Course at the Innisbrook Resort in Palm Harbor, Florida, one of four courses he designed at that facility; two of these four were named to a “Top 100 U.S. Golf Courses.”²⁸ This is the only Packard course on which a PGA major event is held, the Valspar Championship, part of the FedEx Cup.

Packard had some aspects of his design that were iconic of his style, some of which are still relevant today. As Ron Whitten of *Golf Digest* called it, “the Larry Packard formula, was based upon economy: moving as little earth as absolutely necessary, shaping features that could be inexpensively maintained and providing holes whose strategies were immediately apparent.”²⁹ The way Packard described it, he wanted to design a “golf course that will have variety and challenges for a wide range of golfing abilities.” Packard also said that, unlike other architects, he wanted golfers to “enjoy playing my courses....I don’t want you to be in a pothole this time, the woods next time, and the water after that....water hazards are visually attractive [but]...three or four holes where water comes into play are plenty....A poor player like myself can go out and play the Copperhead from the front tees and enjoy it.”³⁰ He often told his wife, Ann, that “he loves designing courses that people will want to come back to and play again....he doesn’t want people to think, ‘Oh my gosh, it’s so darn tough I’m out of my league.’”³¹

Lew Smither, one of the Golf Pros at Innisbrook Resort, notes that “each golf course architect has a fingerprint....Larry Packard has the double dogleg.”³² This twist on a standard dogleg, or blind curve (boomerang shaped), is crafted specifically to prevent professionals (and other big-hitting golfers) from shooting a birdie on every par-5. Says Packard, since golfers and equipment keep improving, but courses cannot expand indefinitely, designers must invent ways to keep their courses challenging.

²⁶ Napton and Laingen, p. 32.

²⁷ This number is variable and has been reported as high as 600; however, this seems exaggerated. This number is taken from his biography, Rathbun, cover.

²⁸ Top100golfcourses.com, hosted by TaylorMade. Notably, Packard did not make the same “Top 100 Golf Architects” list.

²⁹ Ron Whitten, “Remembering Larry Packard, an architect who leaves an enduring imprint on the game,” *Golf Digest*, (February 03, 2014).

³⁰ Rathbun, 195-197.

³¹ Ibid.

³² Rathbun, p. 190.

All professionals expect to birdie the par-five holes. This is because for them the holes are not really part fives anymore. Any golfer can hit the ball 200 yards, and professional players average 270 to 275 yards off the tee. To keep the pros from getting onto the green in two, I have devised what they call a double dogleg. To play it safe, you shoot to go around the dogleg. If you try to go directly over it, you risk running into the hazard, whatever it is. A good player can hit 240 yards from the tee. So, I make my first dogleg 240 yards off the tee, and my second dogleg about 220 yards beyond the first.³³

Packard's most famous hole, and most iconic double dogleg, is the 14th hole at Copperhead (Figure 9 Copperhead 14th).

Two other Packard hallmark design features are the judicious use of bunkers. He disliked bunkers that “nobody will ever get in,” and they are very costly to building and maintain. Bunkers on typical Packard courses protect doglegs, green approach shots, and areas where layups are common. Copperhead “reflects Packard’s views regarding finely tuned bunkering,” with between 50-60 bunkers. Often, his bunkers are built on a mound, which protects water—and balls—from trickling in. His typical greens, too, have a unique signature, sloping gently from the front to the back, and “between 5,000 and 8,000 square feet,” noting that on “older courses the greens were built too small...[and] are difficult to maintain for average play because they get too much traffic.”³⁴ Finally, Packard had an ideal course layout: par 4, par 5, par 4, par 3, repeat. This layout prevented players from getting bored by consecutive similar holes, and to get players to use different clubs on every hole, especially early in the round.³⁵ The first several holes he designed typically to be fast moving, to account for full courses and tee times every 6 to 8 minutes, and allowing the back nine to play longer, when players are at the peak of their round.³⁶

Larry Packard was a consequential golf course architect, who used his influence to make golf course design more professional. Part of his efforts to do that included his participation in the ASGCA organization. Mickey Rathbun, Packard's biographer, suggests that his efforts to grow and professionalize both the field and the field's only organization were to bolster and stabilize the discipline of golf course design.³⁷ Whatever his motivation, however, Packard set about the effort to raise the profile of the ASGCA to the level of its counterpart, the American Society of Landscape Architects. Elected to the Presidency of the ASGCA in 1970, Packard pushed to hire a public relations firm, to “promote recognition of the Society as the most comprehensive source of information about golf course design and

³³ Rathbun, p. 190-191.

³⁴ Rathbun, p. 192-193.

³⁵ Rathbun, p. 187.

³⁶ Rathbun, p. 188.

³⁷ Rathbun, p. 107.

the organization whose membership included the most experienced golf course architects.”³⁸ Additionally, he pushed for the Society to hire a firm to manage the organization. Ultimately, they selected a firm that did both, and Paul Fullmer, of the Chicago-based PR firm Seltz, Seabolt and Associates, took the helm, and transformed the ASGCA into a major influence and significant entity in the world of golf. Under Packard’s vision, the ASGCA created offices, newsletters, and expanded the once-exclusionary group to one with defined membership requirements and professional standards.

5. ELIGIBILITY OF THE RAWIGA GOLF COURSE

The National Park Service delineated guidance on how to apply the criteria for evaluating the eligibility of properties for the NRHP in NPS Bulletin 15.³⁹ This guidance states:

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. that are associated with events or activities that have made a significant contribution to the broad patterns of our history; or
- B. that are associated with the lives of persons significant in our past; or
- C. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. that have yielded, or may be likely to yield, information important in prehistory or history.⁴⁰

There are ca. 2,000 golf courses on the National Register of Historic Places (NRHP), the vast majority of which are elements of historic districts. In Ohio, there are three courses listed in the NRHP.⁴¹ Several other Ohio courses have eligible or listed prehistoric archaeological sites on or associated with them. Of the listed courses in Ohio, all are listed under both Criteria A and C.

Clearview is listed for its association with Ethnic Heritage/Black Recreation, and “as a rare example of a vernacular recreational landscape designed and constructed by an African-American.”⁴² The Miami

³⁸ Rathbun, p. 108.

³⁹ “How to Apply the National Register Criteria for Evaluation,” NPS Bulletin 15, available online at https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf.

⁴⁰ Ibid.

⁴¹ It should be noted that one NRHP property in Ohio, the Euclid Golf Allotment, is built on the site of a golf course, but the course was demolished to build the residential development. Additionally, the prevalence of Native American mound sites used in golf courses in Ohio is noted.

⁴² Clearview Golf Course NRHP nomination form, available online at <https://catalog.archives.gov/id/71991458>.

Valley Golf Course and Clubhouse in Dayton was designed by both pioneering golf course architect Donald Ross (“the Michelangelo of Golf”) and The Olmstead Brothers. Findlay Country Club Golf Course dates from 1908, and is associated with golf course architect Tom Bendelow, the “Dean of American Golf,” who has, to date, six courses listed in the NRHP.⁴³

There is nothing in the documentary or survey record to indicate that the Rawiga Golf Course (or its’ predecessors) are associated with either any broad patterns of history or the lives of persons significant in our past. Similarly, the archaeological survey recently completed did not identify any intact archaeological historic properties that would be eligible under Criterion D.⁴⁴ However, Larry Packard was associated with the course design, and he was an important landscape architect whose golf courses should be considered for their eligibility for the NRHP as designed historic landscapes, under Criterion C.⁴⁵ He was the one-time president of the ASGCA and worked on ca. 300 golf courses; his design style, as described above, is a noted hallmark of his courses. As discussed with members of the Ohio State Preservation Office, in this case, in order to be eligible, the Rawiga Golf Course should exhibit not only Packard’s design elements that represent his significance as a designer, but integrity of design, and the context of some notable innovation related to golf or landscape design.

Packard’s premiere design hallmark was the double dogleg par 5 layout. He also followed a few design principles that his courses were known for, including moderately-sized greens, “finely-tuned” use of bunkers, and a course layout whose cadence is par 4, par 5, par 4, par 3, repeat. This design aesthetic was developed after years of practice and dozens of courses.

Rawiga was one of Packard’s early solo design courses. It was designed during the period when Packard and Brent Wadsworth were working together, but there is no indication that Wadsworth participated, either as a designer or a builder.⁴⁶ Further, there is no indication that Packard designed the second nine holes (now roughly the front 9). As far as having the hallmark characteristics of a Packard layout, Rawiga shows little of what would become Packard’s design fingerprint. There are no double dogleg fairways. Of

⁴³ The Highlights of Tom Bendelow’s Career,” available online at <https://archive.lib.msu.edu/tic/monos/Highlightstombendelow16.pdf>.

⁴⁴ See attached Initial Cultural Resource Impact Prediction Study, Row 10.

⁴⁵ It should be noted that NPS Bulletin 15 recognizes architects, artisans, artists, and engineers are often represented by their works, which are eligible under Criterion C. Their homes and studios, however, can be eligible for consideration under Criterion B, because these usually are the properties with which they are most personally associated.

⁴⁶ There are several lists of courses undertaken by Packard and Wadsworth separately, as a team, and as separate but related companies, including Cornish and Whitten, Rathbun, company profiles, obituaries, and course descriptions. None indicate that Wadsworth was involved in Rawiga, or that Packard designed the second nine holes.

the four par-5 holes on the course, three have very gentle doglegs, and only two of the four have any hazard that could affect an average player driving the green in two shots.

The layout of the course is not aligned with Packard's later ideal cadence. Rawiga's front nine are par 4, 3, 5, 4, 4, 4, 5, 3, 4; the back nine shoot par 4, 3, 5, 4, 4, 3, 5, 4, 4. Repeated par 4s went against Packard's goal to ensure inspired and varied course play. Packard's vision of the ideal size for greens was between 5,000-8,000 square feet to ensure fair play but reduce excessive wear and tear on the most delicate course grass; however, Rawiga has only 3 greens that are at least 5,000 square feet, and none that exceed 6,500.⁴⁷ Finally, Packard's views on "finely tuned bunkering," called for between 50-60 bunkers, where Rawiga has just 31 bunkers.

As far as integrity is concerned, there are a number of areas at Rawiga where the integrity of design has been compromised. First, the original nine-hole layout—the only part of the design that any documentation can clearly attribute to Packard—now includes 18 holes. Moreover, since 2000, the front and back nine holes have been swapped; the original first hole is now #10, the original #9 is now #18.⁴⁸ These are the primary alterations to the course design from the original. Integrity of location, setting, materials, workmanship, feeling, and association do not appear to have diminished significantly.

It seems likely that, given Packard's long and prolific career, which included important course innovations as well as innovations related to the development of the golf course architecture field, some of his courses could be determined eligible. However, based on the lack of evidence tying all 18 holes to Mr. Packard, the lack of his signature design elements, and the diminution of design integrity, Row 10 recommends a finding that the Rawiga Golf Course does not possess the qualities of significance for listing in the NRHP under Criterion C.⁴⁹ Similarly, the course is not associated with events or people that have made a significant contribution to the broad patterns of our history, and, as the attached *Phase I Archaeological Survey for the 153-Acre Western Reserve National Cemetery Expansion Project in Seville, in Medina and Wayne Counties, Ohio* demonstrates, the project area does not have the potential to yield information important in prehistory or history.

⁴⁷ This is an estimate derived from using areas calculated using Google Earth, as the course has no information on green sizes.

⁴⁸ All the holes have been switched; these examples are just to highlight the change.

⁴⁹ NB the research conducted here was to determine first if the property would be eligible for its associative value prior to researching eligibility for design or construction value. Accordingly, a detailed investigation of the landscape that includes uses, plantings, grading, construction materials, and planting/maintenance techniques was not a part of this effort.

Sources Cited

Anonymous, "In Chippewa Watershed," *Akron Beacon Journal*, 6/30/1960, p. 7, available online at Newspapers.com, accessed July 20, 2021.

Anonymous, "Obituary for Brenton Wadsworth," *Aurora Beacon-News*, (February 8, 2018), available online at <https://www.legacy.com/us/obituaries/aurora-beacon-news/name/brenton-wadsworth-obituary?id=19955640>.

Anonymous, "Top 100 Architects," Top100golfcourses.com, (April 3, 2019), available online at <https://www.top100golfcourses.com/architects>.

Jeffery D. Brown, "Clearview Golf Course," National Register of Historic Places Nomination Form (Washington, DC: U.S. Department of the Interior, National Park Service, 1978), available online at <https://catalog.archives.gov/id/71991458>.

Lew K. Burnett, "Built Own Links But Not Pool," *Akron Beacon Journal*, February 10, 1964, available online at Newspapers.com, accessed July 20, 2021.

Geoffrey S. Cornish and Ronald L. Whitten, *The Architects of Golf: A Survey of Golf Course Design from Its Beginnings to the Present, With an Encyclopedic Listing of Golf Architects and Their Courses*, Harpercollins, New York, 1993.

Darrel E. Napton and Christopher R. Laingen, "Expansion of Golf Courses in the United States," *Geographical Review*, Vol. 98, No. 1 (January 2008), pp. 24-41, available online at JSTOR, <https://www.jstor.org/stable/30034211>.

National Park Service, "How to Apply the National Register Criteria for Evaluation," NPS Bulletin 15, (Washington, DC: U.S. Department of the Interior, National Park Service, 1990, rev. 1995), available online at https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf.

National Park Service, "How to Evaluate and Nominate Designed Historic Landscapes," NPS Bulletin 18, (Washington, DC: U.S. Department of the Interior, National Park Service, 1990, rev. 1995), available online at <https://www.nps.gov/subjects/nationalregister/upload/NRB18-Complete.pdf>, accessed February 16, 2022.

Ohio Secretary of State Business Details and Findings, "Rawiga Country Club Articles of Incorporation," available online at https://bizimage.ohiosos.gov/api/image/pdf/B070_0044.

Personal Communication, Robert Taub, 7/12/2021.

Mickey Rathbun, *Double Doglegs and Other Hazards: the Life and Work of Larry Packard*, Arlie Hall Press, Kernersville, NC, 2002.

Rawiga Golf Club, "About Us," www.rawigacc.com, accessed February 22, 2022.

Ron Whitten, "Remembering Larry Packard, an architect who leaves an enduring imprint on the game," *Golf Digest*, (February 03, 2014), available online at <https://www.golfdigest.com/story/remembering->

[larry-packard-an-architect-who-leaves-an-enduring#:~:text=Trending-Remembering%20Larry%20Packard%2C%20an%20architect%20who%20leaves,enduring%20imprint%20on%20the%20game&text=Golf%20architect%20Larry%20Packard%2](#)



DEPARTMENT OF VETERANS AFFAIRS
NATIONAL CEMETERY ADMINISTRATION
WASHINGTON DC 20420

May 15, 2022

Devon Frazier, THPO
Absentee-Shawnee Tribe of Indians of Oklahoma
2025 South Gordon Cooper Drive
Shawnee, OK 74801
106NAGPRA@astribe.com

Re: Initial Cultural Resource Impact Prediction Study for the Proposed Acquisition, Development, and Operation of Approximately 156 Acres of Land to Expand the Existing Limits of the Ohio Western Reserve National Cemetery, Seville, Medina County, Ohio

Dear Devon Frazier, THPO,

Pursuant to Section 106 of the National Historic Preservation Act (54 USC 306108), the Ohio Western Reserve National Cemetery (OWRNC) of the U.S. Department of Veterans Affairs (VA), National Cemetery Administration (NCA) is initiating Section 106 consultation with your organization on implementation of the above-referenced project. VA is considering expanding this property in Medina County.

Property Description

The 156-acre proposed acquisition parcel is in Medina County, Ohio (Figure 1 and 2). This area is in northern Ohio, approximately 45 miles south of Cleveland. The parcel is the Rawiga Golf Course, an active, 18-hole public golf course addressed at 10353 Rawiga Road, Seville, Ohio. It is located along the Medina/Wayne County border, immediately south of the existing OWRNC.

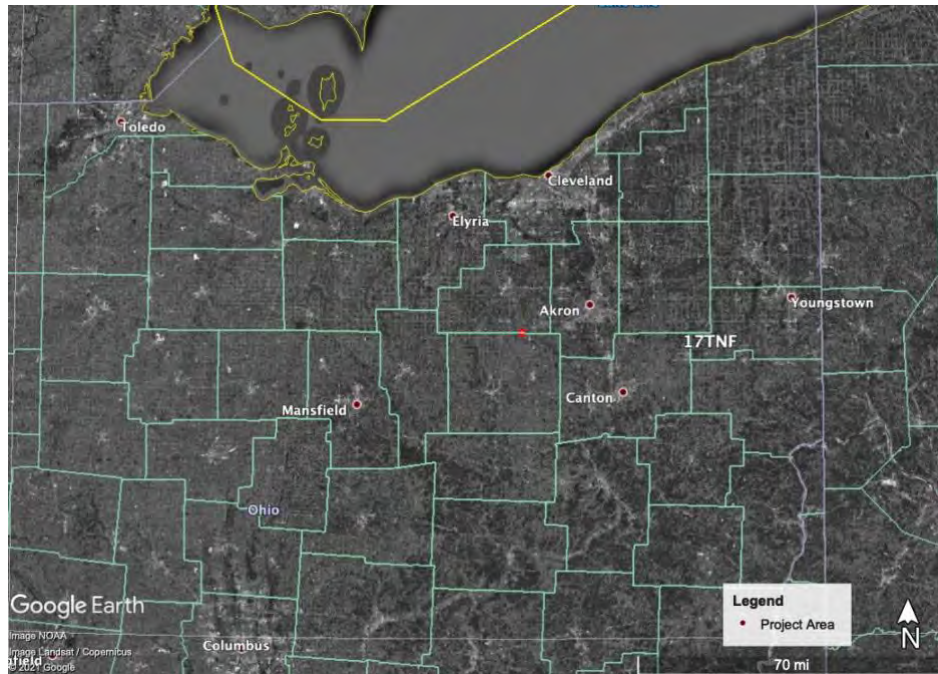


Figure 1 Project Area

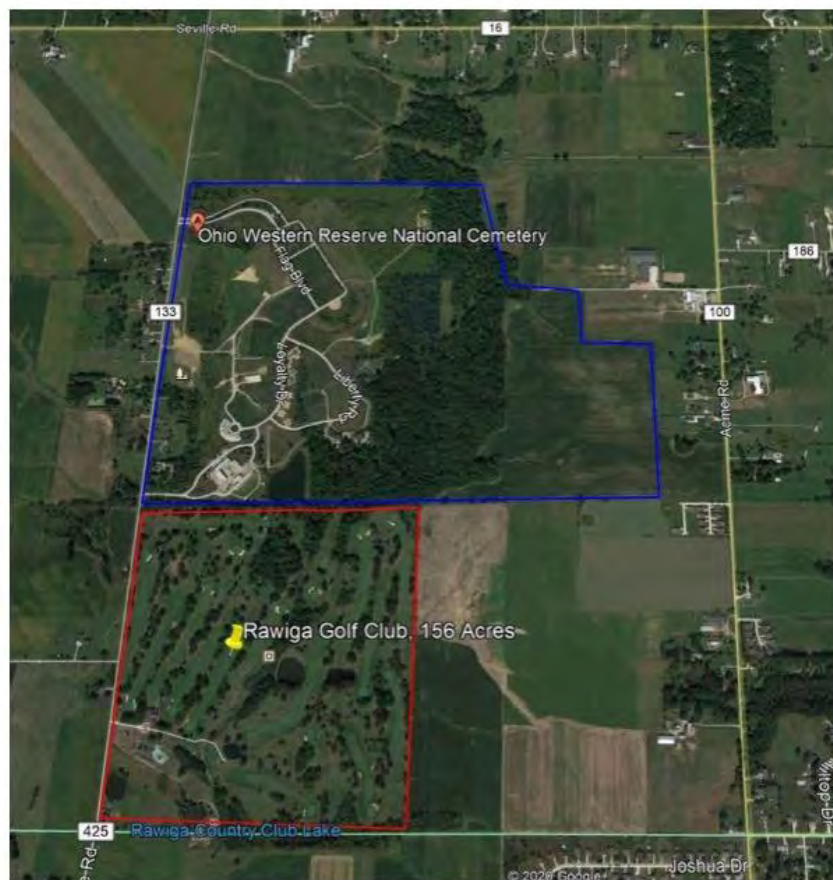


Figure 2 Aerial Photograph of the Existing Ohio Western Reserve National Cemetery and the Rawiga Golf Course Proposed Acquisition Area

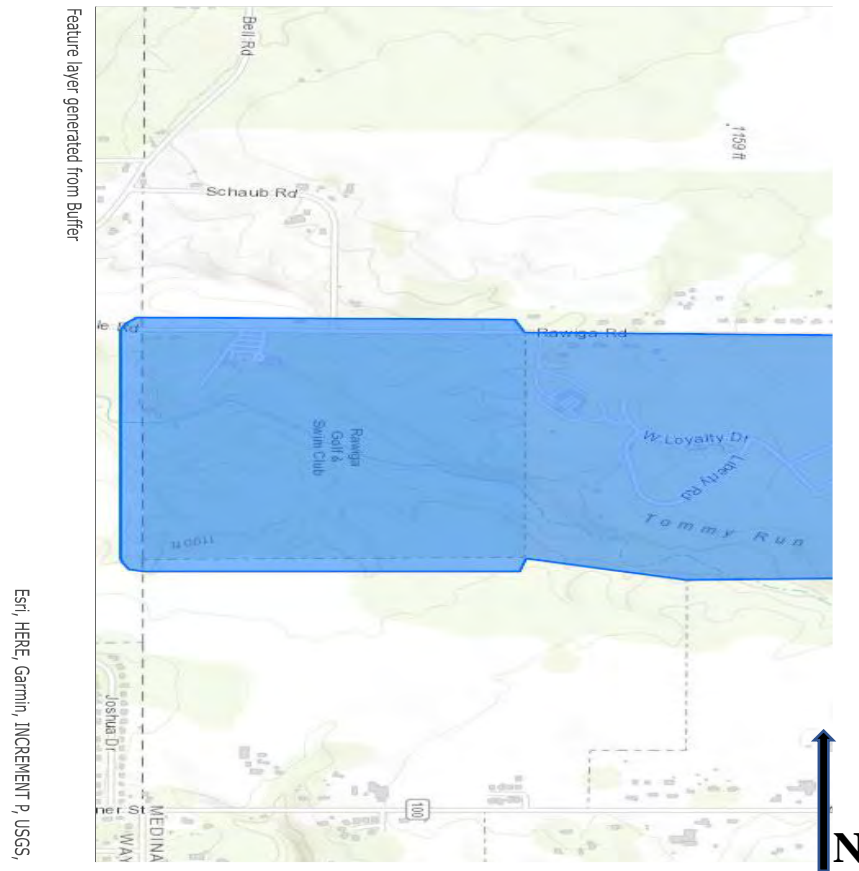


Figure 3 Map of the Area of Potential Effect, shaded in blue.

See Appendix A for additional photos of the parcel and the surrounding area.

Brief History of Property and Study Area

The project area is in the Connecticut Western Reserve lands, land in present-day northern Ohio that was claimed by Connecticut and sold to the Connecticut Land Company in 1795.⁷³ This parcel is in a largely agricultural area. It is bordered on the east, south, and west by agricultural fields, and on the north, the OWRNC. The golf course was constructed in 1959, designed by noted golf course architect E. Lawrence Packard.⁷⁴ Aerial photography from the period prior the construction of the golf course reveals that the parcel was entirely agricultural, with a residence located on the southwest corner. This building and its outbuildings were demolished during the construction of the course, between 1960-65.⁷⁵ A review of the historic aerals and maps shows the course has not changed significantly through its lifetime.

Undertaking

⁷³ From Ohio History, available online at https://ohiohistorycentral.org/w/Western_Reserve, accessed 7/19/2021.

⁷⁴ *NEED CITATION*

⁷⁵ Aerial photographs provided by Historical Information Gatherers, available online at <http://www.historicalinfo.com/>. Provided by TTL Associates, Inc.

The proposed project is the acquisition and subsequent development of additional acreage for the OWRNC. However, as the existing OWRNC was only constructed in 2000, and the Phase III of development is just underway, development of this parcel into a part of the cemetery is not anticipated before 2032-2042. Specific plans for the development were not provided; for the purposes of this ICRIP, it was assumed development typical of other National Cemeteries, including in-ground burials with standard NCA markers, columbaria, chapel, and/or the construction of support buildings that do not exceed a single story in height. Additional utilities are also anticipated.

Area of Potential Effects (APE)

The APE for this undertaking encompasses the existing limits of the OWRNC, as well as the proposed acquisition parcel plus a 150-foot buffer around the proposed acquisition parcel, to account for potential indirect effects due to the construction of above-ground features (Figure 2). Ground disturbance is anticipated to be limited to the boundaries of the parcel. The parcel is separated from the OWRNC by a dense thicket, and by properties to the west by Rawiga Road.

Historic Properties

In June 2021, an architectural historian who meets the *Professional Qualification Standards* for History and Architectural History established by the Secretary of Interior conducted a reconnaissance survey and historic research to identify properties within the APE that are more than fifty years of age and that retain sufficient integrity to warrant listing in the NRHP.

Identification efforts for this ICRIP included a walking survey of the identified acquisition parcel and limited walking survey and windshield survey of the APE and surrounding area. Images of the following properties are available in Appendix A.

Historic Buildings

There are no listed or eligible historic buildings in the APE. There are several buildings and structures associated with the Rawiga Country Club. The clubhouse is 2 story building clad in wood siding, developed into a clubhouse in 1959. It incorporates the barn that was on the property when it was purchased by a group of original members to convert into a golf course and clubhouse (see Figures 5 & 6). It is surrounded by a large, covered porch on three sides that was added between 1973-1985.⁷⁶ The pro shop area, a single-story addition built on the south façade of the original structure, was built between 1973-1982.⁷⁷ The building is modest, with bathrooms, offices, and a large, open dining area on the first floor. On the second floor, there is another large dining area, a modest bar, a commercial kitchen, and unfinished storage. Although the upstairs area is clearly designed for hosting catered celebrations, according to the club manager, the event business is impeded by the fact that the township does not allow liquor sales.⁷⁸ The attic is unfinished and inaccessible. This main building has been changed significantly over time; few of the finishes are original, wood siding covers the original brick

⁷⁶ Aerial photographs provided by Historical Information Gatherers, available online at <http://www.historicalinfo.com/>. Provided by TTL Associates, Inc.

⁷⁷ Aerial photographs provided by Historical Information Gatherers, available online at <http://www.historicalinfo.com/>. Provided by TTL Associates, Inc.

⁷⁸ Personal communication, Bill Colianni, July 13, 2021.

façade, and the porch appears to have been added sometime after 1973.⁷⁹ The building is not individually eligible for the NRHP. If the course itself was determined to be eligible, the clubhouse would not retain enough integrity of materials, design, or workmanship to contribute to a site or district.

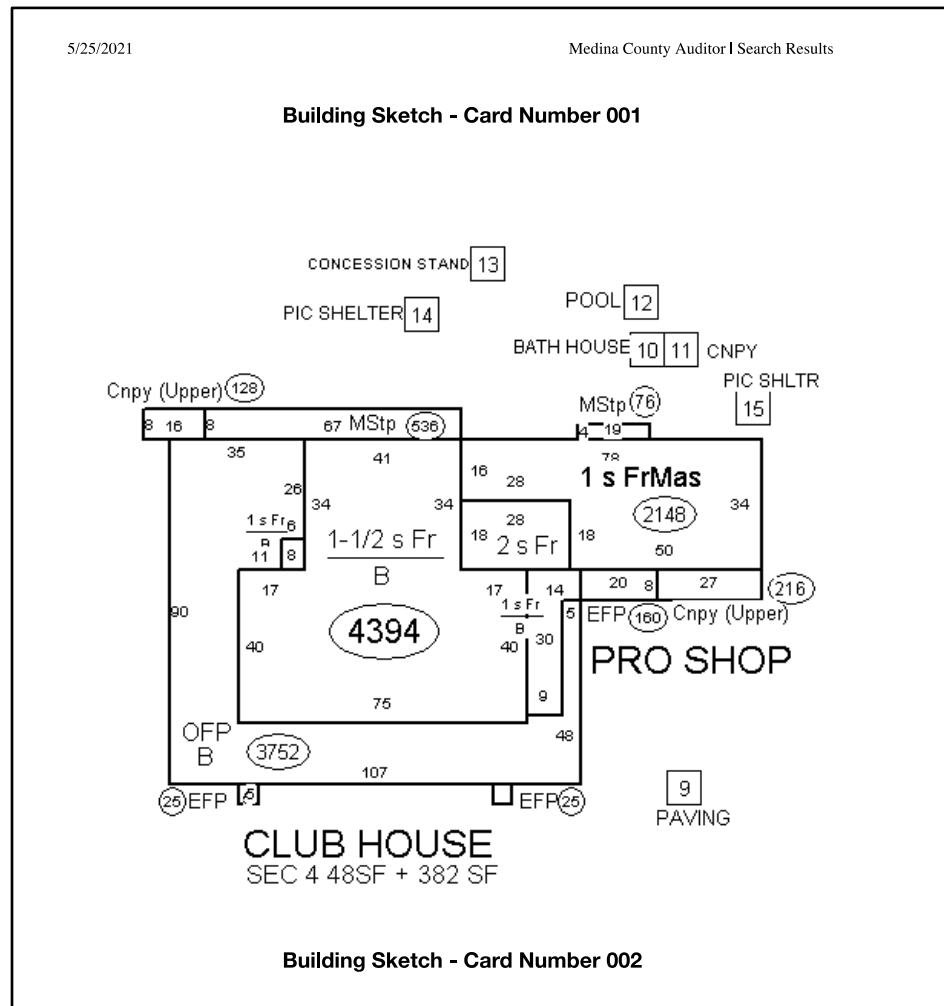


Figure 4 Rawiga Golf and Country Club Clubhouse from the Medina County Tax Assessor

⁷⁹ Aerial photographs provided by Historical Information Gatherers, available online at <http://www.historicalinfo.com/>. Provided by TTL Associates, Inc.

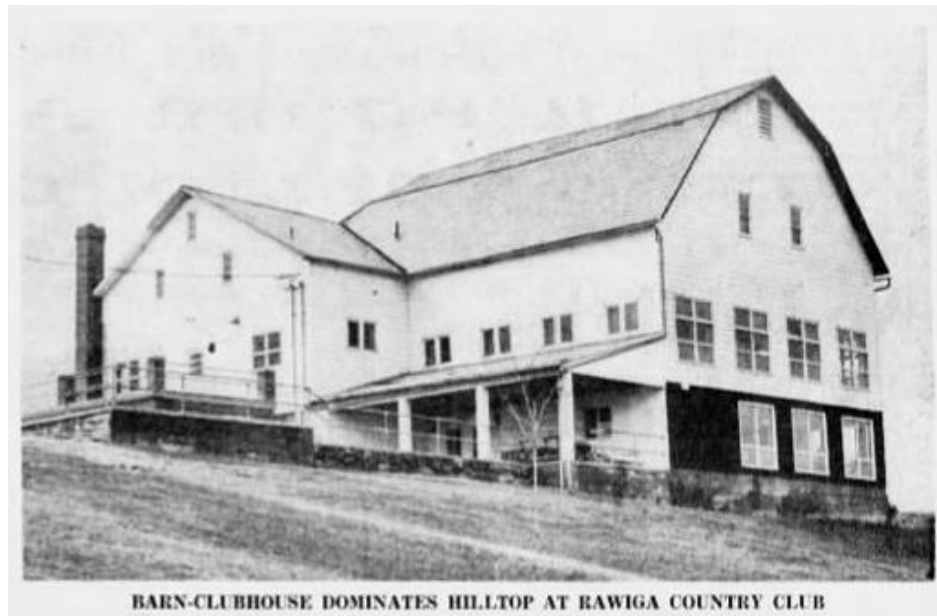


Figure 5 Original barn/clubhouse, looking northwest. Compared to Figure 6, same building in contemporary photo, looking north.



Figure 5 Existing Clubhouse, view looking north; original barn roof can be seen. Pro shop in the foreground right is an addition, as are the enclosed porches.



Figure 6 Clubhouse looking west from the course.

In addition to the main clubhouse building, the property has a pool and bathhouse with a concession stand, and two storage sheds (ca. 1967). The pool is slated for demolition by the current owners; the fate of the pool support buildings is undetermined at this time. In the maintenance area, there are five shed/barn/utility buildings. On the course, there are a few small wooden stream crossings, and a bathroom/shelter. None of these buildings are individually eligible for the NRHP. Even if the golf course is eligible, these buildings would not contribute.

In addition to the buildings in the project area, there are three additional residences located within the APE.

10427 Rawiga Road (1952)

The residence at 10427 Rawiga Road is a small, one and a half story structure that dates from 1952. There are multiple claddings on the exterior, including vinyl siding, brick, and faux stone siding. The front façade features an entrance door shrouded by a closed porch that features a porthole window. The two six-over-six windows appear to be vinyl replacements. A side-gabled roof is split by a small cross-gabled roof over the entry porch. The building has fully finished attic and basement.



Figure 7 10427 Rawiga Road, view looking southeast.

10437 Rawiga Road (1942)

10437 Rawiga Road is a minimal traditional one and a half story residence that closely resembles the plan of its northern neighbor, 10427 Rawiga Road. The front façade features a centered entrance, projected from the main exterior wall. The windows on the front façade appear to be replacement vinyl one-over-one openings. The building has a finished basement. A covered screened-in porch protrudes from the southern façade. A premanufactured shed/barn is located on the southern edge of the property.



Figure 8 10437 Rawiga Road, view looking east.



Figure 9 Barn associated with 10437 Rawiga Road, looking east.

10330 Rawiga Road (1973)

This residence was constructed in 1973. It is a modest single-story ranch home that is clad in brick. A large, two car garage dominates the right (north) side of the front façade. A central set-back front porch stretches from the garage to the two symmetrical windows on the left (south) side of the façade. The front door is located on the left side of the porch, immediately next to the large triple-paned bay window. The south façade contains two vertical double-paned windows. According to the county tax assessor site, the building has a full basement.⁸⁰ Two small premanufactured sheds are also on the site, built in 1995 and 2015.

⁸⁰ Medina County, Ohio GIS system, available online at <http://gm.medinaco.org>. Accessed on 7/19/2021.



Figure 10 10330 Rawiga Road, view looking northwest.



Figure 11 10330 Rawiga Road, view looking west.

None of these homes possess the qualities of significance to be individually eligible. Similarly, none of the outbuildings appear to be individually eligible, nor do any appear to be eligible farmsteads.

Cemeteries

As noted above, the Ohio Western Reserve National Cemetery was established in 2000. The cemetery now encompasses approximately 65 acres, but the cemetery third phase is underway, and eventually the OWRNC will include the adjacent ca. 200 acres that the National Cemetery Association currently owns. The OWRNC is not listed on the NRHP. However, the National Park Service determined that all national cemeteries are eligible for inclusion in the NRHP as “significant places of burial and commemoration” regardless of age. Therefore, the entirety of the developed portion of the OWRNC is eligible for inclusion in the NRHP.⁸¹ Photos of the OWRNC are Figures 28-33, Appendix A.

Archaeological Sites Previously Identified

The records of the OH SHPO indicate there are 17 archaeological sites in the recommended APE. All these sites were identified during a Phase I survey of the current cemetery; no sites are located on the current parcel. This survey, conducted in 1993, included two derelict barns and one historic foundation that were recorded as archaeological sites. The fourteen other archaeological were all prehistoric scatters that were determined not eligible for the NRHP. Both existing barns were assessed as “possibly eligible.” One of these barns is no longer extant. The other barn is located on private property not associated with the Rawiga Golf Course, and it could not be determined if it still stood, because it was not visible from the public right-of-way.

Table 1 Previously Identified Sites

SITE NUMBER	AFFILIATION	NRHP Eligible
ME0290	Prehistoric	Undetermined
ME0291	Prehistoric	Undetermined
ME0292	Prehistoric	Undetermined
ME0293	Prehistoric	Undetermined
ME0294	Prehistoric	Undetermined
ME0295	Prehistoric	Undetermined
ME0296	Prehistoric	Undetermined
ME0297	Prehistoric	Undetermined
ME0298	Prehistoric	Undetermined
ME0299	Prehistoric	Undetermined
ME0300	Prehistoric	Undetermined
ME0301	Prehistoric	Undetermined
ME0302	Prehistoric	Undetermined
ME0303	Prehistoric	Undetermined
ME0304	Historic	Undetermined
ME0305	Historic	Undetermined
ME0306	Historic	Undetermined

⁸¹ National Register Eligibility of National Cemeteries – A Clarification of Policy – A Clarification of Policy, National Park Service, September 8, 2011. Available online at https://www.nps.gov/subjects/nationalregister/upload/Final_Eligibility_of_VA_cemeteries_A_Clarification_of_Policy_rev.pdf (Accessed 7 May 2021).

Figure 12 Table of all identified archaeological sites in the APE

Phase I Archaeological Survey

Ohio Valley Archaeology, Inc. (OVAI) completed a Phase I archaeological survey of an approximately 153-acre area for the Western Reserve National Cemetery Expansion Project. The Phase I archaeological survey consisted of pedestrian reconnaissance and shovel testing, with intervals determined according to High, Moderate, and Low probability zones previously designated by the Ohio State Historic Preservation Office (SHPO) and Environmental Research Group, Inc. (ERG) and provided in the Final Statement of Work CLIN 0002AT from ERG. A total of 474 shovel test pits (STPs) were excavated within the project area and subsurface disturbance was noted throughout, likely related to earthmoving activities from the golf course construction. One archaeological site, 33Me456, was identified in the southwest corner of the project area. Site 33Me456 is represented by an artifact scatter (primarily kitchen and architectural group artifacts) associated with the mid-nineteenth century main barn (modified into the present golf clubhouse). Temporally, many of the ceramics are broadly datable from the mid-nineteenth through early twentieth centuries. These artifacts were likely associated with the demolition of the farm complex and subsequent construction activities. No discrete, intact cultural layers or features were encountered. Artifact density is relatively low, and the site has experienced continuous use into the present. No other cultural materials were encountered within the project area.

In summary, site 33Me456 lacks temporal and physical integrity and is recommended 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 this survey, no further archaeological work is recommended for the project area. For the full report on the archaeological Phase I, please see Appendix B.

Historic Landscapes

The records of the OH SHPO indicate there are no historic landscapes in the recommended APE. However, because the golf course could be a historic landscape, a Determination of Eligibility for the Rawiga Golf Course was conducted. It is NCA's determination that based on the lack of evidence tying all 18 holes to Mr. Packard, the lack of his signature design elements, and the diminution of design integrity, that the Rawiga Golf Course is not eligible for listing in the NRHP (Appendix C).

Traditional Cultural Properties

The records of the OH SHPO indicate there are no traditional cultural properties in the recommended APE. It should be noted, however, that this study did not include a TCP study.

Effects on Historic Properties

Based on the pedestrian building survey and the Phase I archaeological survey (Appendix B), and the Rawiga Golf Course Determination of Eligibility (Appendix C), both of which found there are no historic properties present within the APE, NCA recommends a finding of no historic properties affected pursuant to 36 CFR 800.4(d)(1) is appropriate for the proposed undertaking. The Ohio SHPO has concurred with NCA's finding on this undertaking. NCA is also contacting the federally recognized Native American Tribes and other interested parties listed in Table 2 below, to determine if any organizations have any additional information about

potential historic properties that may be affected by the undertaking and presenting the results of the archaeological survey. All parties are being invited to consult.

Table 2 List of Invited Consulting Parties

Ohio State Historic Preservation Office	Resource Protection and Review Department	800 E. 17th Avenue Columbus, OH 43211-2474	N/A
Medina County Historical Society	Brian Feron, President	206 North Elmwood Street, Medina, Ohio 44256	mchs@zoominternet.net
Diamond Golf Group LLC	Robert M. Taub, Diamond Golf Group, LLC	10353 Rawiga Rd Seville, OH 44273	Robert M. Taub rmt3661@yahoo.com
Northern Ohio Golf Association	Robb Schulze, PGA Chief Executive Officer	Wharton Golf Center at North Olmsted Golf Club, One Golfview Lane, North Olmsted, OH 44070	rschulze@noga.org
Forest County Potawatomi Community of Wisconsin	Michael LaRonge, THPO	P.O. Box 340 Crandon WI 54520	Michael.LaRonge@FCPotawatominnsn.gov
Seneca-Cayuga Nation	William Tarrant, THPO	PO Box 453220 Grove OK 74345	wtarrant@sctribe.com
Wyandotte Nation	Sherri Clemons, THPO	64700 East Highway 60 Wyandotte OK 74370	sclemons@wyandotte-nation.org
Seneca Nation of Indians	Rickey Armstrong, Sr., President	90 Ohiyo Way Salamanca NY 14779	Charisse.ground@sni.org
Ottawa Tribe of Oklahoma	Rhonda Dixon, THPO	13 South 69A Miami OK 74355	rhonda.oto@gmail.com
Eastern Shawnee Tribe of Oklahoma	Brett Barnes, THPO	12705 S. 705 Road Wyandotte OK	bbarnes@estoo.net
Miami Tribe of Oklahoma	Diane Hunter, THPO	PO Box 1326 Miami OK 74355	dhunter@miamination.com
Hannahville Indian Community, Michigan	Kenneth Meshigaud, Chairperson	N14911 Hannahville B1 Road Wilson MI 49896	tyderyien@hannahville.org

Absentee-Shawnee Tribe of Indians of Oklahoma	Devon Frazier, THPO	2025 South Gordon Cooper Drive Shawnee,OK 74801	106NAGPRA@astribe.com
Citizen Potawatomi Nation	Kelli Mosteller, THPO	1601 S. Gordon Cooper Drive Shawnee, OK 74801	kelli.mosteller@potawatomi.org
Delaware Nation	Nekole Alligood, Director of Cultural Resources & Section 106	PO Box 825 Anadarko,OK 73005	Nalligood@delawarenation.com
Delaware Tribe of Indians	Dr. Brice Obermeyer, Historic Preservation	1 Kellog Circle Emporia,KS 66801	bobermeyer@delawaretribe.org
Peoria Tribe of Indians of Oklahoma	Craig Harper, Chief	PO Box 1527 Miami, OK 74355	Chiefharper@peoriatribe.com
Pokagon Band of Potawatomi	Matthew Bussler, THPO	PO Box 180 Dowagiac,MI 49047	matthew.bussler@pokagoband-nsn.gov
Prairie Band Potawatomi Nations	Thomas Wabmum, THPO	16281 Q Road Mayetta,KS 66509	thomaswabmum@pbpnation.org
Shawnee Tribe	Benjamin Barnes, Chief	29 South Highway 69A Miami, OK 74355	rondede@gmail.com
Tonawanda Nation	Roger Hill, Chief	7027 Meadville Road Basom, NY 14013	tonseneca@aol.com
Turtle Mountain Band ofChippewa Indians	Jeffrey Desjarlais, Tribal Historic Preservation Officer	PO Box 900 Belcourt, ND58316	Jeffrey.desjarlais@tmbci.org

If you have any questions about this project, or if you or members of your organization are aware of cultural properties that may be affected by the development of any of the above parcels, please contact Mr. William Edward Hooker at William.hooker@va.gov, 202-632-6631. We thank you for your commitment to historic resources and ongoing support of Veterans.

Sincerely,

W. Edward Hooker, III
Historic Architect/Cultural Resources Manager
National Cemetery Administration
Design and Construction Service

CC: Héctor M. Abreu-Cintrón, VA Federal Preservation Officer



In reply, refer to
2021-MED-52407

May 5, 2022

Marianne Marinucci
U.S. Department of Veterans Affairs
Marianna.Marinucci@va.gov

RE: Ohio Western Reserve National Cemetery Expansion Project, Guilford Township, Medina County, Ohio

Dear Ms. Marinucci:

This letter is in response to the correspondence received on April 6, 2022 regarding the proposed Ohio Western Reserve National Cemetery Expansion Project, Guilford Township, Medina County, Ohio. We appreciate the opportunity to comment on this project. The comments of the Ohio State Historic Preservation Office (SHPO) are submitted in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C.306108 [36 CFR 800]).

The proposed undertaking including the acquisition and development of an additional 156-acres for the Ohio Western Reserve National Cemetery in Guilford Township. The area is currently the Rawiga Golf Course. Our office previously approved the scope of work for the undertaking in August 2021 with Environmental Research Group, LLC and Row 10 Historic Preservation Solutions, LLC.

The following comments pertain to the *Phase I Archaeological Survey for the 153-Acre Western Reserve National Cemetery Expansion Project in Seville, in Medina and Wayne Counties, Ohio* by Stacy M. Dunn, Jessica Clark, and Shelby Frideger (OVAL, 2022).

A literature review, visual inspection and shovel test unit excavation was completed as part of the investigations. No previously identified archaeological site are located within the project area. One (1) new archaeological sites was identified during survey. Ohio Archaeological Inventory (OAI) 33ME0456 is a historic site identified in the southwest corner of the project area. The site is not recommended eligible for listing in the National Register of Historic Places (NRHP). Our office agrees with this recommendation and no further archaeological survey is necessary.

The following comments pertain to the *Determination of Eligibility, Rawiga Golf Course* (2022).

A literature review and field survey were completed as part of the investigations. Based on the information provided, we concur that the Rawiga Golf Course does not meet minimum criteria for inclusion in the NRHP. No further architectural survey is recommended.

Based on the information provided, we agree the project as proposed will have no effect on historic properties. No further coordination with this office is necessary, unless the project changes or unless new or additional historic properties are discovered during implementation of this project. In such a situation, this office should be contacted. Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs. If you have any questions, please contact me at (614) 298-2022, or by e-mail at khorrocks@ohiohistory.org, or Joy Williams at jwilliams@ohiohistory.org. Thank you for your cooperation.

Sincerely,

Krista Horrocks, Project Reviews Manager
Resource Protection and Review

RPR Serial No: 1092794



EASTERN SHAWNEE CULTURAL PRESERVATION DEPARTMENT

70500 East 128 Road, Wyandotte, OK 74370

November 8, 2021

Department of Veterans Affairs

4251 I Street, NW

Washington, DC 20001

RE: *Ohio Western reserve National Cemetery Expansion NEPA Scoping, Multiple County, Ohio*

Dear Mr. Sturm,

The Eastern Shawnee Tribe has received your letter regarding the above referenced project(s) within Multiple County, Ohio. The Eastern Shawnee Tribe is committed to protecting sites important to Tribal Heritage, Culture and Religion. Furthermore, the Tribe is particularly concerned with historical sites that may contain but not limited to the burial(s) of human remains and associated funerary objects.

As described in your correspondence, and upon research of our database(s) and files, we find our people occupied these areas historically and/or prehistorically. However, the project proposes **NO Adverse Effect** or endangerment to known sites of interest to the Eastern Shawnee Tribe. Please continue project as planned. However, should this project inadvertently discover an archeological site or object(s) we request that you immediately contact the Eastern Shawnee Tribe, as well as the appropriate state agencies (within 24 hours). We also ask that all ground disturbing activity stop until the Tribe and State agencies are consulted. Please note that any future changes to this project will require additional consultation.

In accordance with the NHPA of 1966 (16 U.S.C. § 470-470w-6), federally funded, licensed, or permitted undertakings that are subject to the Section 106 review process must determine effects to significant historic properties. As clarified in Section 101(d)(6)(A-B), historic properties may have religious and/or cultural significance to Indian Tribes. Section 106 of NHPA requires Federal agencies to consider the effects of their actions on all significant historic properties (36 CFR Part 800) as does the National Environmental Policy Act of 1969 (43 U.S.C. § 4321-4347 and 40 CFR § 1501.7(a)). This letter evidences NHPA and NEPA historic properties compliance pertaining to consultation with this Tribe regarding the referenced proposed projects.

Thank you, for contacting the Eastern Shawnee Tribe, we appreciate your cooperation. Should you have any further questions or comments please contact our Office.

Sincerely,

Paul Barton, Tribal Historic Preservation Officer (THPO)

Eastern Shawnee Tribe of Oklahoma

(918) 666-5151 Ext:1833

APPENDIX D – SITE PHOTOGRAPHS

SITE PHOTOGRAPHS



Photo #1: Entrance to Rawiga Golf Club and paved parking lot.



Photo #2: Looking at the west side of main Site building – Clubhouse and Pro Shop.



Photo #3: Looking at the east side of main Site building.



Photo #4: Looking north at the south side of main Site building – main entrance.



Photo #5: Former Pool House building.



Photo #6: Golf course storage building.

SITE PHOTOGRAPHS



Photo #7: Golf course maintenance building.



Photo #8: Golf course storage building.



Photo #9: Golf course storage building.



Photo #10: Golf course storage buildings.



Photo #11: One 500-gallon gasoline AST and one 500-gallon diesel AST located in the southeastern portion of the maintenance area.



Photo #12: Water well near pump house.

SITE PHOTOGRAPHS



Photo #13: Golf course wastewater treatment system.



Photo #14: General view of golf course.



Photo #15: Golf course pond (used for irrigation).



Photo #16: Tommy Run (stream) flowing through central portion of the Site.



Photo #17: Wood area in the northern portion of the Site.



Photo #18: Unnamed tributary in northwestern portion of the Site.

SITE PHOTOGRAPHS



Photo #19: Rawiga Road north of the Site.



Photo #20: Easterly adjacent agricultural land beyond the golf course.



Photo #21: Agricultural land and residences located south of the Site.

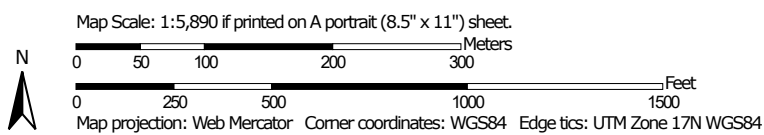


Photo #22: Residence located west of Site across Rawiga Road.

APPENDIX E – OTHER RELEVANT ENVIRONMENTAL DATA

- **Soil Survey Map**
- **IPaC Report**
- **NWI Wetlands Map**
- **Floodplain Map**
- **EJSCREEN Report**

Soil Map—Medina County, Ohio, and Wayne County, Ohio



Natural Resources
Conservation Service

Web Soil Survey
National Cooperative Soil Survey

7/11/2021
Page 1 of 4

MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:15,800.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Medina County, Ohio

Survey Area Data: Version 20, Jun 11, 2020

Soil Survey Area: Wayne County, Ohio

Survey Area Data: Version 18, Jun 11, 2020

Your area of interest (AOI) includes more than one soil survey area. These survey areas may have been mapped at different scales, with a different land use in mind, at different times, or at different levels of detail. This may result in map unit symbols, soil properties, and interpretations that do not completely agree across soil survey area boundaries.

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Feb 3, 2012—Mar 11, 2012

MAP LEGEND

MAP INFORMATION

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
CnB	Chili loam, 2 to 6 percent slopes	11.8	7.5%
Le	Lobdell silt loam	13.3	8.5%
Or	Orrville silt loam	4.5	2.9%
RsB	Rittman silt loam, 2 to 6 percent slopes	60.8	38.7%
RsC2	Rittman silt loam, 6 to 12 percent slopes, eroded	21.4	13.6%
RsE2	Rittman silt loam, 12 to 25 percent slopes, eroded	1.2	0.8%
RsF	Rittman silt loam, 25 to 70 percent slopes	24.9	15.8%
RtD2	Rittman silt loam, 12 to 18 percent slopes, eroded	0.5	0.3%
W	Water	1.2	0.7%
WaA	Wadsworth silt loam, 0 to 2 percent slopes	1.6	1.0%
WuF	Wooster silt loam, 25 to 70 percent slopes	9.2	5.8%
Subtotals for Soil Survey Area		150.3	95.7%
Totals for Area of Interest		157.1	100.0%

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
Le	Lobdell silt loam, occasionally flooded	1.2	0.8%
RrF	Rittman silt loam, 25 to 70 percent slopes	2.5	1.6%
RsB	Rittman silt loam, 2 to 6 percent slopes	0.9	0.6%
W	Water	2.2	1.4%
Subtotals for Soil Survey Area		6.8	4.3%
Totals for Area of Interest		157.1	100.0%



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ohio Ecological Services Field Office

4625 Morse Road, Suite 104

Columbus, OH 43230-8355

Phone: (614) 416-8993 Fax: (614) 416-8994



In Reply Refer To:

July 05, 2022

Project Code: 2022-0060670

Project Name: Proposed Ohio Western Reserve National Cemetery Expansion

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <https://www.fws.gov/birds/policies-and-regulations.php>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/birds/policies-and-regulations/executive-orders/e0-13186.php>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Ohio Ecological Services Field Office

4625 Morse Road, Suite 104

Columbus, OH 43230-8355

(614) 416-8993

Project Summary

Project Code: 2022-0060670

Event Code: None

Project Name: Proposed Ohio Western Reserve National Cemetery Expansion

Project Type: New Constr - Above Ground

Project Description: Rawiga Golf & Swim Club property

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@40.991576550000005,-81.81091596271627,14z>



Counties: Medina and Wayne counties, Ohio

Endangered Species Act Species

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 1 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is final critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: <ul style="list-style-type: none"> ▪ Incidental take of the northern long-eared bat is not prohibited at this location. Federal action agencies may conclude consultation using the streamlined process described at https://www.fws.gov/midwest/endangered/mammals/nleb/s7.html Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Insects

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

Flowering Plants

NAME	STATUS
Eastern Prairie Fringed Orchid <i>Platanthera leucophaea</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/601	Threatened

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

IPaC User Contact Information

Agency: Department of Veterans Affairs
Name: Paul Jackson
Address: 44265 Plymouth Oaks Boulevard
City: Plymouth
State: MI
Zip: 48170
Email: pjackson@ttlassoc.com
Phone: 7345824960

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Medina and Wayne counties, Ohio



Local office

Ohio Ecological Services Field Office

☎ (614) 416-8993

📠 (614) 416-8994

4625 Morse Road, Suite 104
Columbus, OH 43230-8355

NOT FOR CONSULTATION

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act requires Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can only be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

-
1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information. IPaC only shows species that are regulated by USFWS (see FAQ).

2. [NOAA Fisheries](#) also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> Wherever found There is final critical habitat for this species The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-eared Bat <i>Myotis septentrionalis</i> Wherever found This species only needs to be considered if the following condition applies: <ul style="list-style-type: none"> Incidental take of the northern long-eared bat is not prohibited at this location. Federal action agencies may conclude consultation using the streamlined process described at https://www.fws.gov/midwest/endangered/mammals/nleb/s7.html No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/9045	Threatened

Insects

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/9743	Candidate

Flowering Plants

NAME	STATUS
Eastern Prairie Fringed Orchid <i>Platanthera leucophaea</i> Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/601	Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds
<https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide conservation measures for birds
<https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the **PROBABILITY OF PRESENCE SUMMARY** at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)

Bald Eagle *Haliaeetus leucocephalus*

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1626>

Breeds Dec 1 to Aug 31

Black-billed Cuckoo *Coccyzus erythrophthalmus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9399>

Breeds May 15 to Oct 10

Bobolink *Dolichonyx oryzivorus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 20 to Jul 31

Red-headed Woodpecker *Melanerpes erythrocephalus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 10 to Sep 10

Wood Thrush *Hylocichla mustelina*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 10 to Aug 31

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range; for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (—)

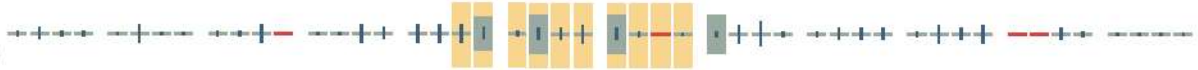
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

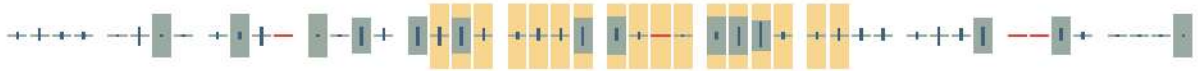
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



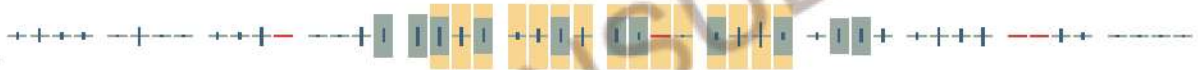
Bobolink
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental
USA and
Alaska.)



Red-headed
Woodpecker
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental
USA and
Alaska.)



Wood Thrush
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental
USA and
Alaska.)



Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#) or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Coastal Barrier Resources System

Projects within the [John H. Chafee Coastal Barrier Resources System](#) (CBRS) may be subject to the restrictions on federal expenditures and financial assistance and the consultation requirements of the Coastal Barrier Resources Act (CBRA) (16 U.S.C. 3501 et seq.). For more information, please contact the local [Ecological Services Field Office](#) or visit the [CBRA](#)

[Consultations website](#) The CBRA website provides tools such as a flow chart to help determine whether consultation is required and a template to facilitate the consultation process.

THERE ARE NO KNOWN COASTAL BARRIERS AT THIS LOCATION.

Data limitations

The CBRS boundaries used in IPaC are representations of the controlling boundaries, which are depicted on the [official CBRS maps](#). The boundaries depicted in this layer are not to be considered authoritative for in/out determinations close to a CBRS boundary (i.e., within the "CBRS Buffer Zone" that appears as a hatched area on either side of the boundary). For projects that are very close to a CBRS boundary but do not clearly intersect a unit, you may contact the Service for an official determination by following the instructions here: <https://www.fws.gov/service/coastal-barrier-resources-system-property-documentation>

Data exclusions

CBRS units extend seaward out to either the 20- or 30-foot bathymetric contour (depending on the location of the unit). The true seaward extent of the units is not shown in the CBRS data, therefore projects in the offshore areas of units (e.g., dredging, breakwaters, offshore wind energy or oil and gas projects) may be subject to CBRA even if they do not intersect the CBRS data. For additional information, please contact CBRA@fws.gov.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

WETLAND INFORMATION IS NOT AVAILABLE AT THIS TIME

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the [NWI map](#) to view wetlands at this location.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should

seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

NOT FOR CONSULTATION



U.S. Fish and Wildlife Service

National Wetlands Inventory

Wetlands



August 23, 2021

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

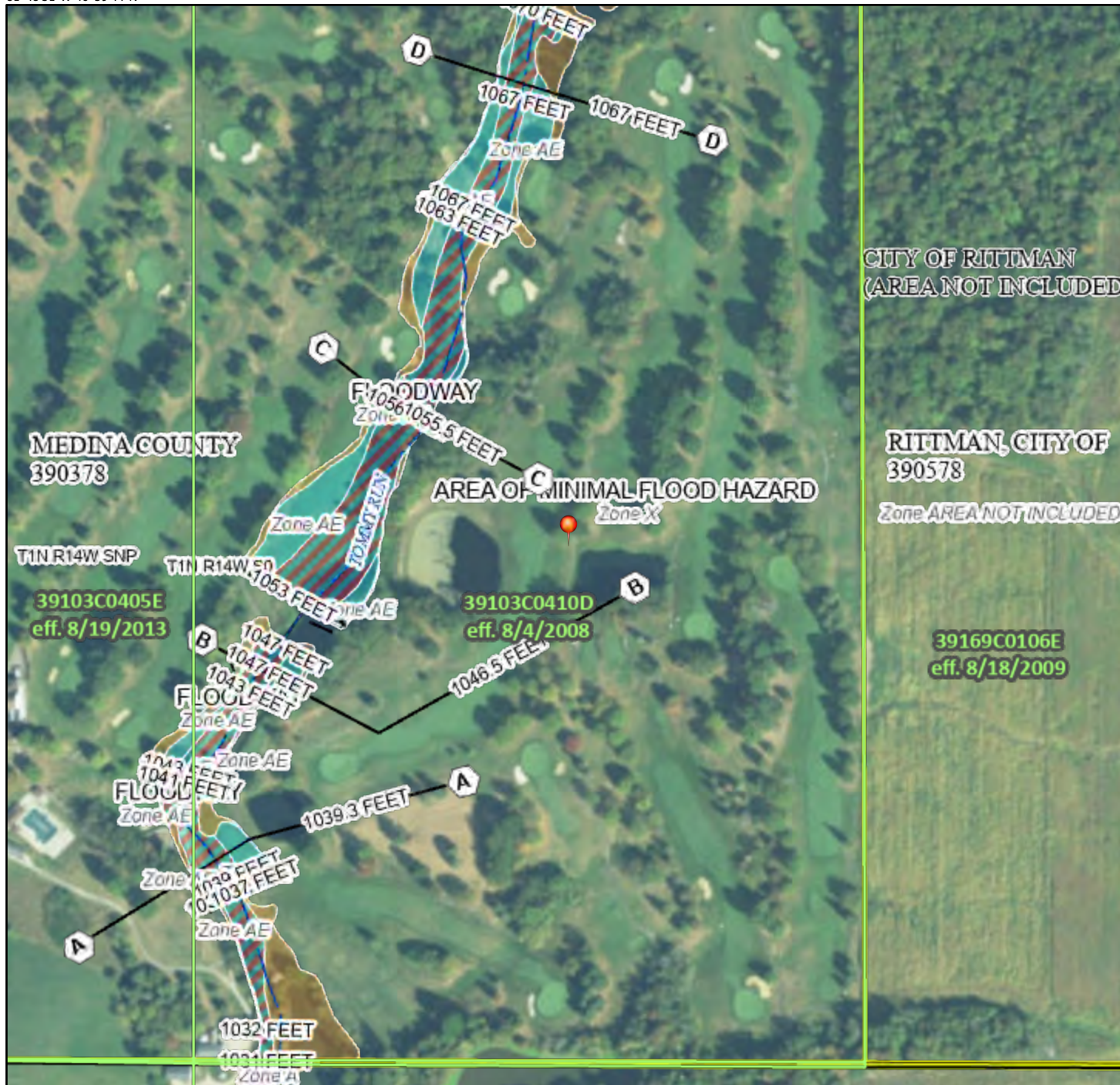
- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Flood Hazard Layer FIRMeTte



81°48'51"W 40°59'44"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
GENERAL STRUCTURES		Area of Undetermined Flood Hazard Zone D
		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **8/23/2021 at 6:08 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

0 250 500 1,000 1,500 2,000 Feet 1:6,000

Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020

81°48'14"W 40°59'17"N

National Flood Hazard Layer FIRMette



81°48'53"W 40°59'27"N



0 250 500 1,000 1,500 2,000 Feet

1:6,000

81°48'16"W 40°59'N

Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
GENERAL STRUCTURES		Area of Undetermined Flood Hazard Zone D
		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
MAP PANELS		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
		Digital Data Available
		No Digital Data Available
		Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **8/23/2021 at 6:17 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

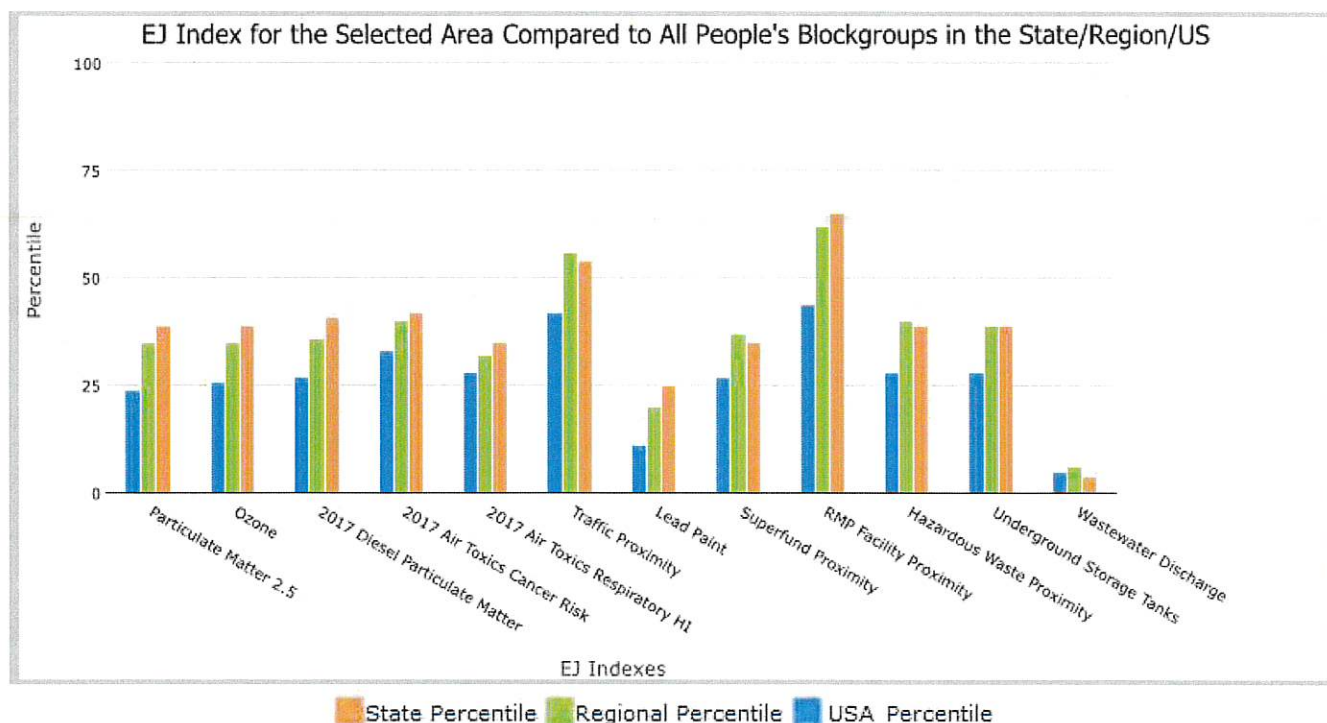
2 miles Ring Centered at 40.996510,-81.810898, OHIO, EPA Region 5

Approximate Population: 4,375

Input Area (sq. miles): 12.56

10353 Rawiga Road, Seville, OH

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
Environmental Justice Indexes			
EJ Index for Particulate Matter 2.5			
EJ Index for Ozone			
EJ Index for 2017 Diesel Particulate Matter*			
EJ Index for 2017 Air Toxics Cancer Risk*			
EJ Index for 2017 Air Toxics Respiratory HI*			
EJ Index for Traffic Proximity			
EJ Index for Lead Paint			
EJ Index for Superfund Proximity			
EJ Index for RMP Facility Proximity			
EJ Index for Hazardous Waste Proximity			
EJ Index for Underground Storage Tanks			
EJ Index for Wastewater Discharge			



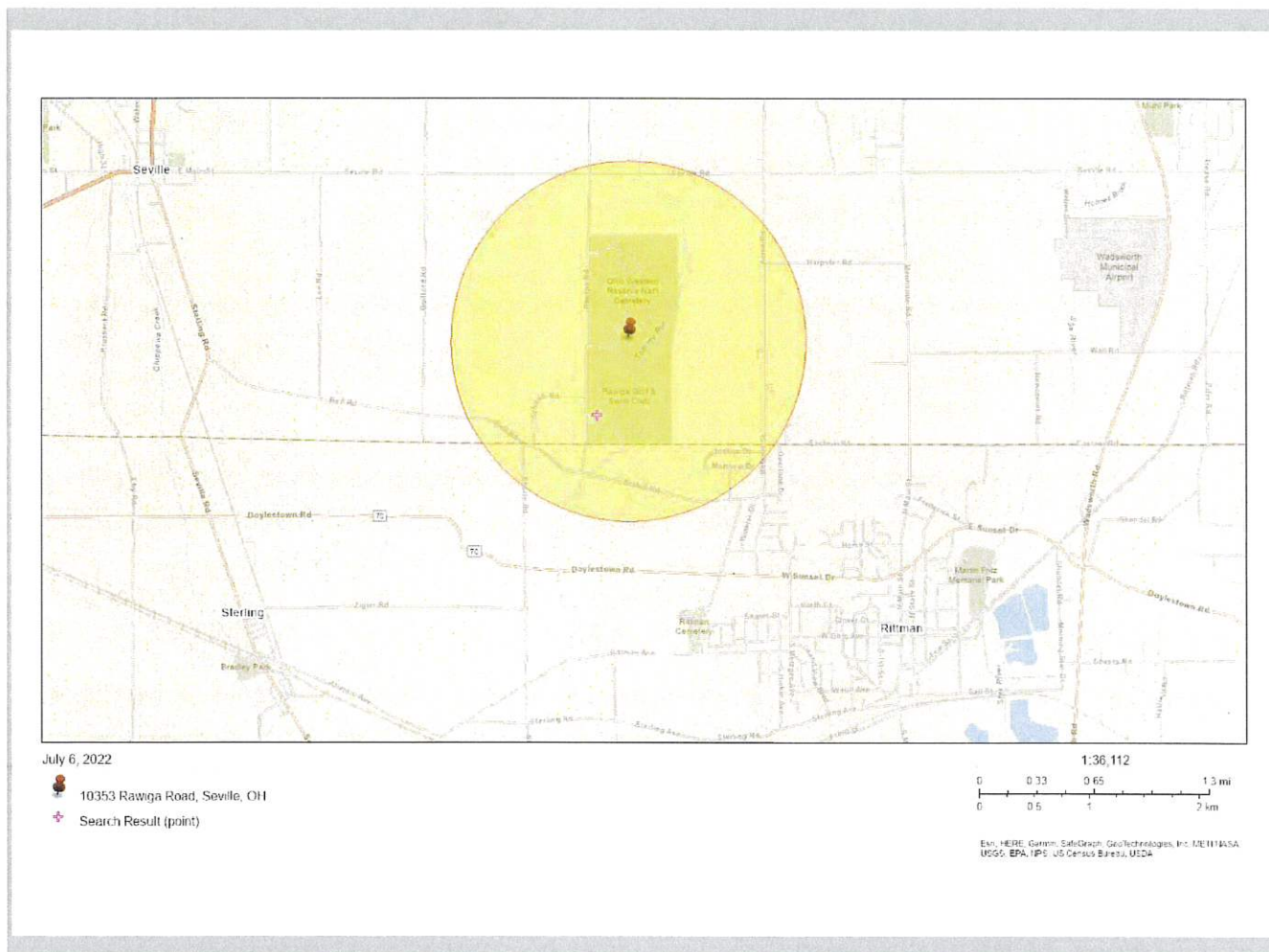
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

2 miles Ring Centered at 40.996510,-81.810898, OHIO, EPA Region 5

Approximate Population: 4,375

Input Area (sq. miles): 12.56

10353 Rawiga Road, Seville, OH



Sites reporting to EPA

Superfund NPL

Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)

EJScreen Report (Version 2.0)



2 miles Ring Centered at 40.996510,-81.810898, OHIO, EPA Region 5

Approximate Population: 4,375

Input Area (sq. miles): 12.56

10353 Rawiga Road, Seville, OH

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Pollution and Sources							
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)							
Ozone (ppb)							
2017 Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)							
2017 Air Toxics Cancer Risk* (lifetime risk per million)							
2017 Air Toxics Respiratory HI*							
Traffic Proximity (daily traffic count/distance to road)							
Lead Paint (% Pre-1960 Housing)							
Superfund Proximity (site count/km distance)							
RMP Facility Proximity (facility count/km distance)							
Hazardous Waste Proximity (facility count/km distance)							
Underground Storage Tanks (count/km ²)							
Wastewater Discharge (toxicity-weighted concentration/m distance)							
Socioeconomic Indicators							
Demographic Index							
People of Color							
Low Income							
Unemployment Rate							
Linguistically Isolated							
Less Than High School Education							
Under Age 5							
Over Age 64							

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

For additional information, see: www.epa.gov/environmentaljustice

EJScreen is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJScreen outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

APPENDIX F – PUBLIC NOTICES AND COMMENTS



U.S. DEPARTMENT OF VETERANS AFFAIRS OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT

NOTICE OF SCOPING AND PUBLIC INVOLVEMENT UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT FOR THE PROPOSED LAND ACQUISITION FOR THE EXPANSION OF THE OHIO WESTERN RESERVE NATIONAL CEMETERY

The U.S. Department of Veterans Affairs (VA) Office of Construction and Facilities Management is gathering information to assist with the preparation of an Environmental Assessment (EA) as part of the federal decision-making process for the proposed acquisition of approximately 156 acres of land currently occupied by the Rawiga Golf & Swim Club at 10353 Rawiga Road in Seville, Ohio for the future expansion of Ohio Western Reserve National Cemetery. The Site would be leased back to the current owners for continued operation of the golf course and swim club for at least 15 years, until expansion of the Ohio Western Reserve National Cemetery becomes necessary.

In accordance with the National Environmental Policy Act (NEPA), VA is seeking the public's input on issues to be addressed during the NEPA process, including environmental concerns that may occur as a result of the proposed federal action. VA will also be initiating consultation under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108 at a future date. VA will be consulting with the State Historic Preservation Office, Tribes, and other consulting parties to identify historic properties that may potentially be affected by the undertaking and to seek ways to avoid, minimize or mitigate for potential adverse effects.

A public scoping period is open through **October 28, 2021**. During this time, the public is invited to submit comments on the proposed action and identify potential issues or concerns for consideration in the NEPA process. All submissions should be sent/made via email to vacoenvironment@va.gov with the subject line "Ohio Western Reserve National Cemetery Expansion NEPA EA Scoping."

If including your address, phone number, e-mail address, or other personally identifiable information in your comment, please be aware that your entire comment – including your personal identifiable information – may be made publicly available at any time. While you can ask us in your comment to withhold your personally identifiable information from public review, we cannot guarantee that we will be able to do so.

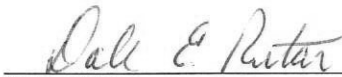
AFFIDAVIT

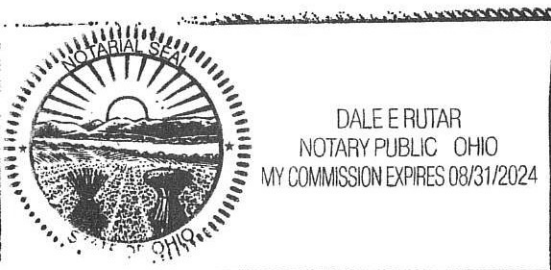
THE STATE OF OHIO
County of Medina

I, the undersigned, being duly sworn, do upon my oath depose and say for the publishers of THE MEDINA GAZETTE; that said newspaper is printed and published, and of general circulation in Medina County; that said newspaper meets the requirements of Sections 7.12 and 5721.01 Ohio Revised Code as amended effective September 14, 1957, and that the notice, a copy of which is attached, was published in said newspaper once a week for a period of 2 consecutive weeks, from the 2nd day of October, 2021 A.D., to the 5th day of October, 2021 A.D., inclusive.


Legal Clerk, THE MEDINA GAZETTE

Sworn to and subscribed before me this 5th day of October, 2021.


Notary Public



U.S. DEPARTMENT OF
VETERANS AFFAIRS
OFFICE OF CONSTRUCTION AND FACILITIES
MANAGEMENT

NOTICE OF SCOPING
AND PUBLIC INVOLVEMENT UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT FOR THE PROPOSED LAND ACQUISITION FOR THE EXPANSION OF THE OHIO WESTERN RESERVE NATIONAL CEMETERY

The U.S. Department of Veterans Affairs (VA) Office of Construction and Facilities Management is gathering information to assist with the preparation of an Environmental Assessment (EA) as part of the federal decision-making process for the proposed acquisition of approximately 156 acres of land currently occupied by the Rawiga Golf & Swim Club at 10353 Rawiga Road in Seville, Ohio for the future expansion of Ohio Western Reserve National Cemetery. The Site would be leased back to the current owners for continued operation of the golf course and swim club for at least 15 years, until expansion of the Ohio Western Reserve National Cemetery becomes necessary.

In accordance with the National Environmental Policy Act (NEPA), VA is seeking the public's input on issues to be addressed during the NEPA process, including environmental concerns that may occur as a result of the proposed federal action. VA will also be initiating consultation under Section 106 of the National Historic Preserva-

tion Act, 54 U.S.C. 306108 at a future date. VA will be consulting with the State Historic Preservation Office, Tribes, and other consulting parties to identify historic properties that may potentially be affected by the undertaking and to seek ways to avoid, minimize or mitigate for potential adverse effects.

A public scoping period is open through **October 28, 2021**. During this time, the public is invited to submit comments on the proposed action and identify potential issues or concerns for consideration in the NEPA process. All submissions should be sent/made via email to vacoenvironment@va.gov with the subject line "Ohio Western Reserve National Cemetery Expansion NEPA EA Scoping."

If including your address, phone number, e-mail address, or other personally identifiable information in your comment, please be aware that your entire comment - including your personal identifiable information - may be made publicly available at any time. While you can ask us in your comment to withhold your personally identifiable information from public review, we cannot guarantee that we will be able to do so.

M.G. 10/2-5/21
20690737

Printer's Fees	\$	334.36
Notary Fees	\$	1.50
TOTAL	\$	335.86