



U.S. Department of Veterans Affairs

Great Lakes National Cemetery Phase 3 Gravesite Development and Cemetery Improvements Final Environmental Assessment

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Prepared for:

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Office of Construction and Facilities Management

Prepared by:

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Executive Summary

In this Final Environmental Assessment (EA), the United States (U.S.) Department of Veterans Affairs (VA) identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's proposed Phase 3 expansion of the Great Lakes National Cemetery (National Cemetery) in Oakland County, Michigan (MI).

This Final EA has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 United States Code 4321-4370h), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26). This EA and the analysis herein are required to determine if the VA's Proposed Action would have significant environmental impacts.

Purpose and Need

The purpose of the Proposed Action is to provide fifteen years of additional interment capacity to serve the projected burial needs of Veterans in the Great Lakes region. The Proposed Action is needed to meet the National Cemetery Administration's (NCA's) goal of providing eligible Veterans and their family members with reasonable access to VA interment options.

The Proposed Action serves to further NCA's mission in honoring Veterans and their eligible family members with final resting places in national shrines and with lasting tributes that commemorate their service and sacrifice to our nation. The Proposed Action, representing the Phase 3 expansion, would provide additional interment capacity, as well as develop facility infrastructure for future expansions.

Proposed Action

The VA Office of Construction and Facilities Management is considering implementing a phased expansion of the Great Lakes National Cemetery. VA's proposed Phase 3 expansion project would develop approximately 30 acres of undeveloped land to provide approximately 36,200 gravesites, including both casket and cremation sites in new burial sections. This major construction project is intended to provide 15 years of service. Additionally, the Proposed Action will include the following development and improvements:

- Access roads and parking lots
- Columbarium structures
- Cold storage building
- Fueling station and aboveground fuel storage tank
- Irrigation pump house
- Full renovation/reconfiguration of the Administration Building and maintenance facility
- Installation of Service Seals for the Committal Shelters

The Proposed Action will meet the NCA's goal of providing eligible Veterans and their family members with reasonable access to VA interment options. To fulfill its mission to honor Veterans, VA has determined that there is a need to continue providing Veteran burial options at the Great Lakes National Cemetery and to ensure future interment availability. These benefits are provided by VA under the National Cemetery Act of 1973 and Chapter 24 of Title 38, United States Code.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented. The Great Lakes National Cemetery would remain in its current state and the requirements of the National Cemeteries Act of 1973 would not be fulfilled. The No Action Alternative does not meet the purpose and need nor support NCA's goal of providing eligible Veterans and their family members with reasonable access to

VA interment options. However, analysis of the No Action Alternative is required by CEQ regulations. It also provides a benchmark for comparing and analyzing the effects of the other alternatives.

Affected Environment and Environmental Consequences

The EA describes the baseline physical, environmental, cultural, and socioeconomic conditions at the project site and the general vicinity, with emphasis on those resources potentially impacted by the alternatives. Potential impacts on physical, environmental, cultural, and socioeconomic conditions are analyzed for each alternative. Resource areas considered in this EA are aesthetics; air quality; greenhouse gas emissions and climate change; cultural and historic resources; geology, topography, and soils; hydrology and water quality; wildlife and habitat; noise; land use; floodplains and wetlands; socioeconomics; community services, solid waste, and hazardous materials; traffic, transportation, and parking; utilities; and environmental justice. The EA also addresses the potential for generating substantial controversy and cumulative impacts.

Table ES-1-1. Summary of Impacts and Best Management Practices

Resource Area	Proposed Action	No Action Alternative
Aesthetics	The proposed physical changes to the National Cemetery would not detract from the aesthetics. Aesthetic impacts during construction activities would be temporary and less than significant. Physical changes to the National Cemetery would be consistent with existing architecture as well as landscaping. Aesthetic impacts would be less than significant .	None
Air Quality	Construction activities would have short-term minor impacts related to emissions and fugitive dust. Combined construction and operation emissions would be substantially below the General Conformity maintenance area de minimis threshold. Air quality impacts would be less than significant .	None
Greenhouse Gas Emissions and Climate Change	Construction equipment and vehicles would emit greenhouse gases while operating. VA would use lower emitting equipment/vehicles and local contractors and minimize vehicle/equipment idling to the extent feasible. Greenhouse gas emissions and climate change effects are anticipated to be less than significant .	None
Cultural and Historic Resources	The Michigan State Historic Preservation Office concurred with VA's determination that the Proposed Action will not adversely affect any historic or cultural resources.	None
Geology, Topography, and Soils	Ground-disturbing activities would have minimal changes to topography. Ground disturbances would be stabilized during operation and all permit requirements would be met. Impacts to geology and soils would be less than significant .	None
Hydrology and Water Quality	Onsite stormwater engineering controls to retain and manage stormwater flow would be implemented and Clean Water Act permit requirements would be met. Construction activities would comply, to the extent practicable, with local agencies'	None

	requirements to minimize adverse effects to Waters of the U.S. and best management practices (BMPs), resulting in less than significant impacts to hydrology and downgradient water quality.	
Wildlife and Habitat	The National Cemetery does not contain any critical habitat for State- or Federally-listed species. United States Fish and Wildlife Service (USFWS) time-of-year restrictions for clearing of vegetation, including trees, would be implemented, occurring only between October 1 through March 31. The project site will be reviewed during the Eastern Massasauga active season (April-September) by a qualified ecologist and individual experienced in surveying the species, to confirm presence or absence. Identification and awareness training regarding the potential presence of the Eastern Massasauga would be provided to construction personnel. No effects to designated habitat or listed species are anticipated, resulting in less than significant impacts to wildlife and habitat.	None
Noise	Construction activities would result in minor short-term noise impacts . Long-term operational noise within the area of the Proposed Action would be consistent with the existing cemetery operations associated with maintenance activities and ceremonial rifle salutes. There are no significant long-term operational noise impacts .	None
Land Use	The National Cemetery would remain compatible with surrounding land uses, resulting in less than significant impacts.	None
Floodplains and Wetlands	Temporary impacts to a portion of the identified wetlands, streams, and Fagan Lake are anticipated to occur from construction activities. VA will obtain the necessary permits from U.S. Army Corps of Engineers and water quality certification from the Michigan Department of Environment, Great Lakes, and Energy Water Resources Division for temporary impacts to jurisdictional waters. Since a portion of the Proposed Action is within a floodplain, a Permit for Floodplain Development would be required from the United States Federal Emergency Management Agency. No significant impacts to floodplains or wetlands are anticipated.	None
Socioeconomics	There would be short-term beneficial impacts to local employment and personal income during construction activities.	None
Community Services	Construction activities at the National Cemetery are not expected to place additional substantial demands on police, fire, emergency services, and other community services, resulting in no significant impacts .	None

Solid Waste and Hazardous Materials	During construction, the presence and use of petroleum and hazardous substances could increase the potential for accidental release or spill; however, minimization measures would make this potential impact less than significant. A fueling station and 500-gallon diesel fuel aboveground storage tank would be installed at the cemetery; however, VA would follow all appropriate fueling procedures to prevent leaks or spills. The presence of the diesel fuel tank is not anticipated to result in adverse impacts to the National Cemetery.	None
Traffic, Transportation, and Parking	Project activities are not anticipated to significantly impact existing or future traffic patterns surrounding the National Cemetery. Impacts to traffic during construction would be temporary, localized, and less than significant .	None
Utilities	There would be a negligible increase in the consumption of utilities, including electricity, natural gas, potable water, and stormwater/sanitary sewer discharges during construction and operation of the Phase 3 expansion. Impacts would be less than significant .	None
Environmental Justice	There would be no disproportionate impacts to disadvantaged populations, resulting in less than significant impacts .	None

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Acronyms and Abbreviations

AADT	average annual daily traffic
Amsl	above mean sea level
APE	area of potential effect
AQD	Air Quality Division
BCC	birds of conservation concern
BFE	base flood elevation
BGEPA	Bald and Golden Eagle Protection Act
BMP	best management practice
CAA	Clean Air Act
CAER	University of Michigan – Flint Center for Applied Environmental Research
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CH ₄	methane
CO	carbon monoxide
CO ₂	carbon dioxide
CWA	Clean Water Act
dBA	A-weighted decibel scale
DNL	day/night noise level
EA	environmental assessment
ECS	ECS Midwest, LLC
EGLE	Michigan Department of Environment, Great Lakes, and Energy
EJSCREEN	USEPA-developed Environmental Justice Screening and Mapping Tool
ESA	Endangered Species Act
GHG	greenhouse gas
HCM	highway capacity manual
HUD	United States Department of Housing and Urban Development
IPaC	Information for Planning and Consultation
LOS	level of service
MBTA	Migratory Birds Treaty Act
N ₂ O	nitrous oxide
NCA	National Cemetery Administration
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969

NHPA	National Historic Preservation Act of 1966
NO ₂	nitrogen dioxide
NO _x	nitric oxide
NPDES	National Pollutant Discharge Elimination System
NRCS	National Resources Conservation Service
NRHP	National Register of Historic Places
O ₃	ozone
Pb	lead
PM	particulate matter
PM ₁₀	coarse particulate matter
PM _{2.5}	fine particulate matter
PSD	Prevention of Significant Deterioration
RCOC	Road Commission for Oakland County
RCRA	Resource Conservation and Recovery Act
SESC	soil erosion and sedimentation control
SHPO	State Historic Preservation Office
SO ₂	sulfur dioxide
THPO	Tribal Historic Preservation Officer
U.S.	United States
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
VA	United States Department of Veterans Affairs
VOCs	volatile organic compounds
WB	westbound
WOTUS	Waters of the United States
WRD	Water Resources Division

1.0 Introduction

This Final Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 United States Code ([USC] 4321 et seq.), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and Environmental Effects of the Department of Veterans Affairs Actions (38 CFR Part 26). This EA is required to determine if the United States (U.S.) Department of Veterans Affairs' (VA's) Proposed Action would have significant environmental impacts. Federal agencies are required to consider the environmental and related social and economic effects of their proposed actions prior to initiating them. This EA has been prepared in accordance with relevant guidance from VA's *NEPA Interim Guidance for Projects* dated September 2010.

This EA identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's proposed Phase 3 gravesite development and cemetery improvements at the Great Lakes National Cemetery. The project site is located at 4200 Belford Road in Oakland County, Michigan.

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

1.1 Background

The Great Lakes National Cemetery serves Veterans and their families in the Great Lakes region by providing interment options, including casketed and in-ground burial of cremated remains, for all eligible individuals. The cemetery is located approximately 50 miles northwest of downtown Detroit, in Holly Township, Oakland County and borders Fagan Lake. The area surrounding the cemetery is rural with residential development.

Historically, the land was utilized as farmland before it was acquired by the National Cemetery Administration (NCA) in 2002. In the 20th century, the land was purchased by a Spanish-American War Veteran who constructed a small house on the property in 1927. The Great Lakes National Cemetery was established in 2005, and the first burial took place on October 17 of that year.

See Figure 1-1 for a map showing the Great Lakes National Cemetery and surrounding area.

1.2 Purpose and Need

The purpose of the Proposed Action is to provide fifteen years of additional interment capacity to serve the projected burial needs of Veterans in the Great Lakes region. The Proposed Action is needed to meet the NCA's goal of providing eligible Veterans and their family members with reasonable access to VA interment options.

The Proposed Action serves to further NCA's mission in honoring Veterans and their eligible family members with final resting places in national shrines and with lasting tributes that commemorate their service and sacrifice to our nation. The Proposed Action, representing the Phase 3 expansion of a 12-phase master plan, would provide additional interment capacity for Veterans and their families.

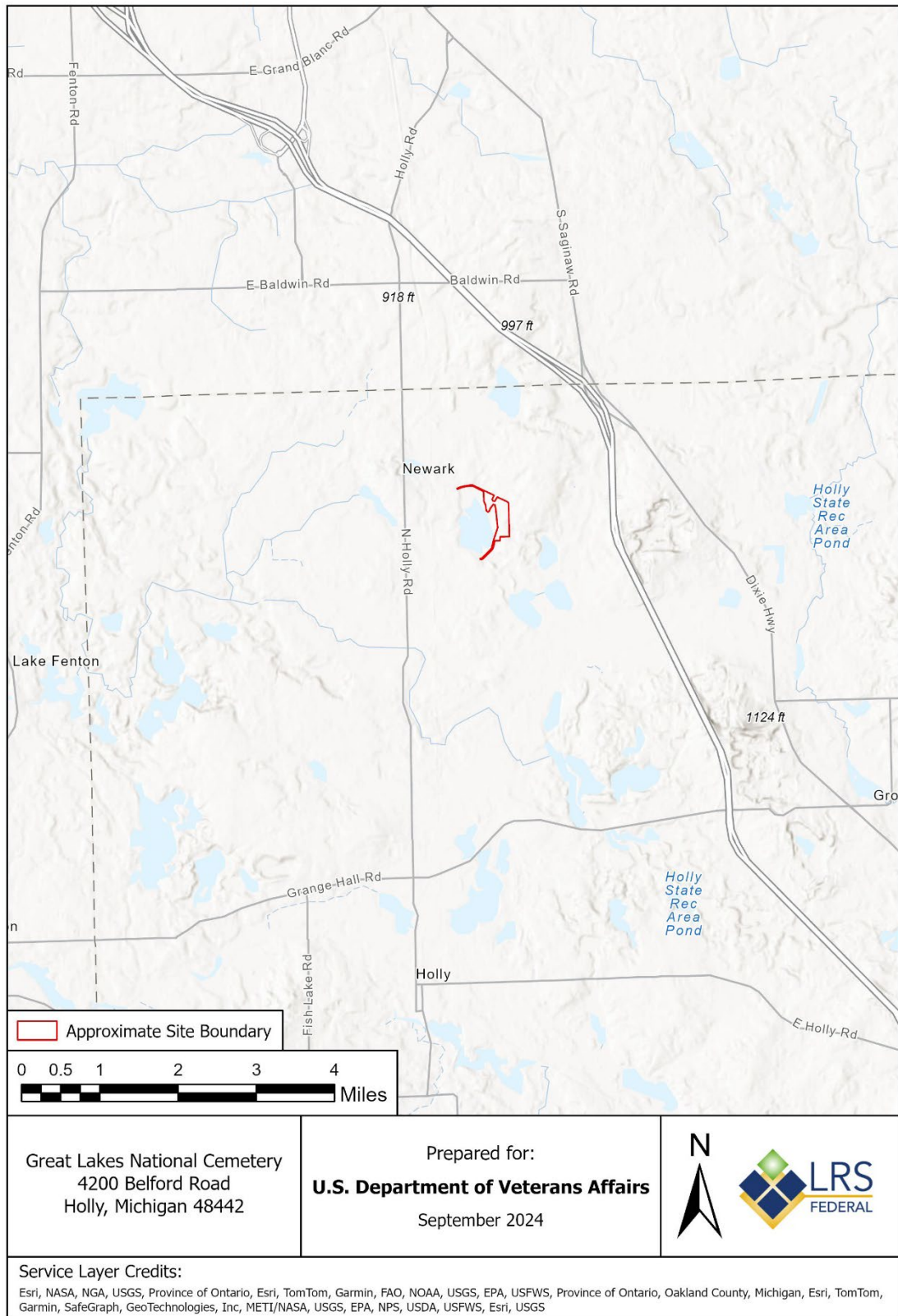


Figure 1-1. Area Surrounding the Great Lakes National Cemetery Phase 3 Expansion Project Site

2.0 Proposed Action and Alternatives

This section describes the Proposed Action and alternatives considered by VA, including those alternatives eliminated from further analysis. NEPA and VA regulations for implementing NEPA require all reasonable alternatives to be rigorously explored and objectively evaluated.

2.1 Proposed Action

The purpose of the Proposed Action is to enable the Great Lakes National Cemetery to continue providing burial services and facilities for eligible Veterans and their family members in the Great Lakes region. Under the Proposed Action, VA will develop approximately 30 acres of undeveloped land to provide approximately 36,200 gravesites, including both casket and cremation sites in new burial sections. This major construction project is intended to provide 15 years of service. Additionally, the Proposed Action will include the following development and improvements:

- Access roads and parking lots
- Columbarium structures
- Cold storage building
- Fueling station and diesel fuel storage tank
- Irrigation pump house
- Full renovation/reconfiguration of the Administration Building and maintenance facility
- Installation of Service Seals for the Committal Shelters

The Proposed Action will meet the NCA's goal of providing eligible Veterans and their family members with reasonable access to VA interment options. To fulfill its mission to honor Veterans, VA has determined that there is a need to continue providing Veteran burial options at the Great Lakes National Cemetery and to ensure future interment availability. These benefits are provided by VA under the National Cemetery Act of 1973 and Chapter 24 of Title 38, USC.

See Figure 2-1 for a map of the project location.



Figure 2-1. Great Lakes National Cemetery Phase 3 Expansion Project Location

2.2 No Action Alternative

CEQ regulations require consideration of the No Action Alternative. The No Action Alternative also serves as a baseline against which the Proposed Action is evaluated.

Under the No Action Alternative, the Proposed Action would not be implemented. The Great Lakes National Cemetery would remain in its current state and would deplete its inventory of available gravesites. The No Action Alternative is not considered viable because it results in the NCA failing to fulfill its goal of assuring that all eligible Veterans have access to a burial option within 75 miles of their residence. The No Action Alternative would limit the NCA's ability to provide interment options for Veterans in support of its mission and does not meet the purpose of and need for the Proposed Action established by the VA.

2.3 Alternatives Eliminated from Further Consideration

VA did not identify other alternative actions that would accomplish the defined purpose and need for this project. The Great Lakes National Cemetery has been in use since 2005; therefore, the location for the Phase 3 expansion is limited to the remaining undeveloped portions of the land acquired by VA in 2002. The Phase 3 expansion is in-line with the Master Plan for the cemetery.

3.0 Affected Environment and Environmental Consequences

This section describes the baseline physical, environmental, cultural, and socioeconomic conditions at the proposed project site and the general vicinity, with emphasis on those resources potentially impacted.

CEQ guidelines and regulations encourage agencies to streamline environmental analyses in their EAs (CEQ, 2012) by focusing on significant issues and discussing insignificant issues only briefly, discussing impacts in proportion to their significance, and incorporating by reference other environmental analyses (40 CFR 1500.4(c), 1502.2(b), and 1502.21).

Impacts are identified as either significant or less than significant. The terms “effects” and “impacts” are synonymous in this EA. Where possible, impacts are identified as short-term, temporary, or long-term in relation to the length of the effect of the impact.

Resource areas considered in this EA are aesthetics; air quality; greenhouse gas emissions and climate change; cultural and historic resources; geology and soils; hydrology and water quality; wildlife and habitat; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomic; community services, solid waste and hazardous materials; traffic, transportation, and parking; utilities; and environmental justice. This section also addresses cumulative impacts and the potential for generating substantial controversy.

3.1 Aesthetics

3.1.1 Affected Environment

The affected area is located 50 miles northwest of downtown Detroit, in Oakland County at 4200 Belford Road, Holly, Michigan. The site is bordered to the north by Belford Road, to the east by Fagan Road, to the west by Fagan Lake, and sparse forested habitat to the southwest. The site consists primarily of a former agricultural field and a forested area located along the southern portion of the site. This forested area bisects two lakes with associated wetland features that include live and dead deciduous trees.

3.1.2 Environmental Consequences

3.1.2.1 Proposed Action

The Phase 3 expansion area encompasses approximately 30 acres of undeveloped land bordering the northern, eastern, and southern boundaries of Fagan Lake. The primary access roads in the vicinity of the site are Belford Road to the north and Fagan Road to the east. The surrounding area is generally rural with sparse agricultural and residential development. Site construction and earthwork activities would temporarily convert existing vegetation to exposed soil during construction of the gravesites and funerary niches. Upon completion of earthwork, managed turf, landscaped features, and other planned improvements would be established and installed.

The development of additional gravesites and funerary niches will be consistent with the existing nearby National Cemetery development. Aesthetic impacts during construction will be temporary and are not considered to represent a significant impact.

3.1.2.2 No Action Alternative

Under the No Action Alternative, no new development would occur at the National Cemetery and the aesthetics of the area would remain the same. The No Action Alternative would have no impact on aesthetics.

3.2 Air Quality

Air quality refers to the degree of pollution in the air, often assessed by measuring concentrations of pollutants and comparing them to health-based limits set by the U.S. Environmental Protection Agency (USEPA) under the Clean Air Act (CAA) and its associated amendments. Air pollution can adversely affect communities located nearby to stationary and mobile combustion equipment, painting and solvent use areas, and construction/demolition activities that generate fugitive dust.

3.2.1 Affected Environment

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division is delegated CAA enforcement authority by USEPA for air emission sources operating in the State of Michigan.

The National Primary and Secondary Ambient Air Quality Standards (NAAQS) of the CAA are set by the USEPA to limit the concentration of air pollutants considered harmful to public health and the environment. Pollutants regulated under the NAAQS include ozone (O₃), particulate matter (PM), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead (Pb). O₃ is formed in the atmosphere as a product when nitric oxide (NO_x), Volatile Organic Compounds (VOCs), and light react. As such, O₃ emission reductions are met by reducing emissions of its precursors, NO_x and VOCs. The NAAQS limit PM levels according to particle diameter, with separate standards for coarse (PM₁₀) and fine (PM_{2.5}) particulate matter. An area's attainment status with the NAAQS is determined by measuring ambient air quality at the county level. An area can either be designated as an *attainment*, *non-attainment*, or *maintenance* area with the NAAQS. All new and existing sources of air pollution are subject to ambient air quality regulation.

The Great Lakes National Cemetery is located in Oakland County, Michigan, which is a maintenance area for 8-hour ozone, as listed in the USEPA's Green Book (USEPA, 2024). Oakland County achieved attainment and was redesignated to maintenance status on May 19, 2023. General Conformity Determinations are required for Federal projects that would meet or exceed the *de minimis* emission thresholds for non-attainment or maintenance areas. The applicable *de minimis* thresholds for Oakland County are shown in Table 3-1 below.

There are no sensitive air quality receptors within the vicinity of the Great Lakes National Cemetery.

Table 3-1. Oakland County NAAQS Attainment Status and General Conformity Rule *De Minimis* Threshold

Criteria Pollutant	Oakland County Attainment Status	Pollutant or Precursor of Concern	<i>De Minimis</i> ^a Emission Rate (tons/year)
Ozone (O ₃)	Maintenance for the 8-hour 2015 standard (Moderate)	NO _x	100
		VOC	50
Particulate Matter ≤ 2.5 microns (PM _{2.5})	Attainment	PM _{2.5}	100
		NO _x	100
		SO ₂	100
		Ammonia	100

Criteria Pollutant	Oakland County Attainment Status	Pollutant or Precursor of Concern	<i>De Minimis</i> ^a Emission Rate (tons/year)
Particulate Matter ≤ 10 microns (PM ₁₀)	Attainment	PM ₁₀	N/A
Lead (Pb)	Attainment	Pb	N/A
Sulfur Dioxide (SO ₂)	Attainment	SO ₂	N/A
Carbon Monoxide (CO)	Attainment	CO	N/A
Nitrogen Dioxide (NO ₂)	Attainment	NO ₂	N/A
^a <i>De minimis</i> emission rates cannot be exceeded for Federal actions taking place in non-attainment and maintenance areas, without conducting a General Conformity Determination, as provided in 40 CFR 93.153(b). Sources: (USEPA, 2024); 40 CFR 93.153			

3.2.2 Environmental Consequences

3.2.2.1 Proposed Action

Implementation of the Proposed Action would result in temporary impacts to air quality from fugitive dust associated with land clearing, grading, and construction activities, as well as vehicular internal combustion engine emissions due to the temporary operation of construction equipment at the site. Best management practices (BMPs) would be implemented to reduce the potential impact on air quality, including the use of fugitive dust suppression measures and reduction of equipment and vehicle idling to minimize exhaust emissions.

A heater is proposed for installation at the maintenance facility. Depending on the fuel source and capacity of the heater selected, a Permit to Install or New Source Review may need to be obtained from the Michigan EGLE Air Quality Division prior to installation unless exemption criteria are met. This is the only stationary source of emissions proposed for the Phase 3 expansion project.

Established under the CAA Section 176(c)(4), General Conformity regulations at 40 CFR Part 93 Subpart B support the protection of nonattainment and maintenance areas by requiring that federal agencies work with state, Tribal, and local agencies and governments with authority and jurisdiction over the areas to ensure that emissions caused by federal actions conform with air quality plans. The State of Michigan maintains a State Implementation Plan to ensure that vulnerable areas meet and maintain NAAQS. The Proposed Action is not anticipated to result in emissions of NO_x or VOCs that would exceed 100 or 50 tons per year, respectively. Therefore, a General Conformity Determination is not likely to be required for the Proposed Action.

A Prevention of Significant Deterioration (PSD) permit applies to new major sources¹ and major modifications at existing sources to prevent the degradation of air quality in attainment areas. A Renewable Operating Permit or Title V permit is required by the CAA for all major sources of pollution. There are no new major sources of emissions included in the Proposed Action; therefore, it is unlikely that VA will need to obtain a PSD permit or Renewable Operating Permit for the Phase 3 expansion project.

3.2.2.2 No Action Alternative

Under the No Action Alternative, construction of the Phase 3 Great Lakes National Cemetery gravesite development would not occur. No impacts to air quality would occur as a result of VA's actions.

3.3 Greenhouse Gas Emissions and Climate Change

Greenhouse gas (GHG) emissions contribute to climate change and include, but are not limited to, carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O).

3.3.1 Affected Environment

Scope 1 GHG emissions are directly emitted by a facility, whereas Scope 2 GHG emissions are indirect emissions associated with the purchase of electricity, steam, heat, or cooling.

The primary sources of Scope 1 GHG emissions at the Great Lakes National Cemetery are a diesel-fuel powered emergency generator and propane tanks.

The National Cemetery does not emit more than 25,000 metric tons of CO₂ equivalent annually and, as such, is not currently required to report their annual GHG emissions to USEPA under the Federal Greenhouse Gas Reporting Program.

Regarding potential future climate change impacts, Michigan is expected to experience more frequent and intense storms and rapid temperature changes, according to *Michigan's Healthy Climate Plan* (EGLE, 2022).

3.3.2 Environmental Consequences

In this section, impacts from a changing climate to the Proposed Action and No Action Alternative will be analyzed. Additionally, the direct and indirect effects of the Proposed Action and No Action Alternative on climate change will be analyzed. Analysis of the Proposed Action and No Action Alternative will cover (1) GHG emissions, (2) the action's effects on climate change, and (3) climate change effects to the action.

3.3.2.1 Proposed Action

Greenhouse Gas Emissions

GHG emissions associated with the Proposed Action include emissions from construction equipment, new stationary equipment, and mobile vehicles.

BMPs that VA will consider implementing under the Proposed Action include using lower-GHG-emitting technologies, procuring construction materials with lower amounts of embodied carbon, and utilizing local contractors and shared transportation where feasible to minimize mileage traveled by workers to and from the site.

¹ A major source is defined as any source that emits or has the potential to emit 100 tons per year or more of any criteria air pollutant is a major source (USEPA).

Effects on Climate Change

The GHG emissions associated with the Proposed Action are minimal and not expected to exacerbate any of the current climate change effects that could be experienced in Oakland County.

Climate Change Effects on the Action

Extreme temperature events due to climate change could cause work stoppages and delays to keep employees safe from heat illness, as regulated by the Occupational Safety and Health Administration. Intense storm events could exacerbate erosion and inundate sediment controls deployed for the project. Erosion and sediment control strategies may require adjustments based on extreme weather events.

Stormwater infrastructure would be designed to handle post-development flow rates and stormwater management facilities would be installed to attenuate the peak flow rates to meet or be below the existing stormwater flow rates. Therefore, it is anticipated that the National Cemetery will be capable of handling intense rainfall events, including 100-year storm events. Therefore, climate change hazards projected to affect the area where the National Cemetery is located are not expected to result in significant impacts to the cemetery.

3.3.2.2 No Action Alternative

Greenhouse Gas Emissions

The No Action Alternative involves leaving the proposed Phase 3 expansion area of the National Cemetery undeveloped and would not release any additional GHG emissions.

Effects on Climate Change

There are no climate change effects anticipated as a result of the No Action Alternative.

Climate Change Effects on the Action

Under the No Action Alternative, the proposed Phase 3 expansion area would remain undeveloped, and the potential impacts of climate change could contribute to flooding and downed trees on the undeveloped land.

3.4 Cultural and Historic Resources

Historic properties are defined by the National Historic Preservation Act (NHPA) as properties including prehistoric and historic sites, structures, buildings, objects, districts, or any other physical evidence of human activity associated with important historic events, with persons important in history, representing the work of a master or exemplary as a type, or with the potential to yield information important to history or prehistory. Cultural resources are protected through several Federal laws and associated regulations, including the NHPA of 1966, the Archaeological and Historic Preservation Act of 1974, the American Indian Religious Freedom Act of 1978, the Archaeological Resources Protection Act of 1979, and the Native American Graves Protection and Repatriation Act of 1990.

Section 106 of the NHPA and its implementing regulations, 36 CFR Part 800, requires an assessment of the potential impact of an undertaking on historic properties that are within the proposed project's area of potential effects (APE), which is defined as the geographic area "within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist."

Analysis of potential effects on cultural resources considers both direct and indirect effects. Direct effects may be the result of physically altering, damaging, or destroying all or part of a resource; altering characteristics of the surrounding environment that contribute to the importance of the resource;

introducing visual, atmospheric, or audible elements that are out of character for the period the resource represents (thereby altering the setting); or neglecting the resource to the extent that it deteriorates or is destroyed. An adverse effect according to NHPA Section 106 Criteria for Adverse Effect (36 CFR 800.5) is if an undertaking (action) diminishes any of the characteristics that qualify a property for inclusion in the National Register of Historic Places (NRHP). These effects are analyzed according to the integrity of the property's location, design, setting, materials, workmanship, feeling, and association.

3.4.1 Affected Environment

Pursuant to the NHPA and its implementing regulations, VA has determined that the APE for the proposed project includes the approximately 30-acre Phase 3 project area, the existing Great Lakes National Cemetery, and areas located within the viewshed of the proposed Phase 3 development. The APE includes the Phase 3 project area where ground disturbance may occur as well as an approximately 500-foot visual buffer surrounding the project area, except where more expansive views are afforded across Fagan Lake to the existing National Cemetery property.

A qualified architectural historian conducted a field reconnaissance of the area surrounding the project area to confirm the visual buffer for the APE. To the north and east, the viewshed will include properties adjacent to the project area along Belford Road and Fagan Road. Views from areas to the east along Belford Road and east of Fagan Road are limited by topography and tree cover. Views from areas to the southeast, including the property along Rose Hill Boulevard, are limited by topography and tree cover within the area south of the project area that will not be developed. The project will be visible from areas to the west and southwest within the developed portions of Great Lakes National Cemetery.

The Great Lakes National Cemetery is located on part of a land grant from the Federal Government to Terrance Fagan in 1836 and, historically, the property was utilized as farmland until the NCA acquired it in 2002. Bryan Dexter Horton, a Spanish American War Veteran and industrialist, purchased the property in the early 20th century, on which he built a small house. Horton was known for his invention of the "Square D" switch, which dramatically improved electrical safety by encasing the switch in steel and protecting users from the live electrical current (VA, 2025). No historic architectural resources associated with Mr. Horton are extant on the NCA property.

A 1947 atlas of Oakland County shows several parcels now comprising the National Cemetery property, and parcels to the east of Fagan Road, were all owned by Bryson D. Horton (W.S. McAlpine Map Co., 1947). The property on the east side of Fagan Road, southeast of the project area, is now part of the Rose Hill Center, a psychiatric treatment and rehabilitation center. The portion of the Rose Hill property nearest the project area includes modern development associated with this facility. A house and barn over 50 years of age are located near the intersection of Fagan Road and Rose Hill Boulevard, outside the APE for the project. In 1947 the area north of the cemetery along Belford Road was divided into three large parcels, two owned by Bert Mitchell and one owned by Gladys King, plus two small residential parcels adjacent to the Pere Marquette Railroad tracks that skirt the west side of the cemetery property. The larger parcels have been subdivided and several residences were constructed here between the mid to late twentieth century.

The Great Lakes National Cemetery is a historic district eligible for the NRHP, inclusive of tracts of land recently acquired but not yet developed for cemetery purposes. Despite the National Cemetery having been established in 2005, according to the National Park Service's *National Register Eligibility of National Cemeteries – A Clarification of Policy*, "all national cemeteries are considered exceptionally significant as a result of their Congressional designation as nationally significant places of burial and commemoration. This means they meet the special requirements set forth in the National Register Criterion Considerations for cemeteries, graves, commemorative properties, and resources less than 50 years of age" (National Park Service, 2011). The developed portions of the National Cemetery property are considered contributing; undeveloped land is not currently contributing but will be once developed.

While conducting a Phase I archeological survey within the APE, which included a pedestrian survey, systematic screened shovel testing, and visual inspection of obviously disturbed areas within three previously unrecorded archaeological sites 20OK556, 20OK557, and 20OK558, all soils observed have no indications for significant archaeological deposits and appear to represent ubiquitous sites that have been commonly documented in similar settings throughout the region. Therefore, sites 20OK556–20OK558 are not eligible for inclusion in the NRHP (Cultural Resource Analysts, 2024).

Four historic architectural resources within the visual buffer portion of the APE for the proposed project have been identified, however, through consultation, the Michigan State Historic Preservation Office (SHPO) provided concurrence on April 26, 2024, that none of the properties are eligible for listing in the NRHP (Appendix B.1). VA also consulted with federally recognized Tribes with a potential interest in the site; however, no responses were received.

3.4.2 Environmental Consequences

3.4.2.1 Proposed Action

Although the developed portions of the National Cemetery property were identified as contributing resources to the Great Lakes National Cemetery historic district, the Michigan SHPO determined that because Phase 3 development will continue to expand and improve the National Cemetery in accordance with established NCA design guidelines and will maintain the respectful memorial landscape of the existing National Cemetery, the project will not adversely affect any of the qualities of Great Lakes National Cemetery that qualify it for listing in the NRHP.

If the Proposed Action's scope of work changes from that which was submitted to and approved by the Michigan SHPO, VA will notify the Michigan SHPO of the changes for review and comment.

Construction and demolition activities would adhere to all federal cultural preservation regulations. In the event human remains or other cultural items, as defined by the Native American Graves Protection and Repatriation Act, are found during construction or operation of the National Cemetery, work would be halted in the area and the appropriate authorities and Tribes would be contacted.

3.4.2.2 No Action Alternative

Selection of the No Action Alternative would not result in any adverse effects to any documented or future undocumented cultural or historic resources.

3.5 Geology and Soils

The geology of an area is characterized by the existing rocks and sediment present. Geologic materials interact with overlying soils by providing minerals and nutrients through weathering. The physical characteristics of soils and underlying bedrock can affect the suitability of a site for development and dictate the types of precautionary measures that should be implemented during earth disturbance activities.

3.5.1 Affected Environment

According to the National Resources Conservation Service (NRCS) Soil Survey Geographic Database, the predominant soil association found within the vicinity of the project area is the Marlette sandy loam association, with one to six percent slopes, as depicted in Figure 3-1.

Topography indicates the subject property generally slopes to the west and there are no structural improvements onsite. Impacts to water resources are analyzed in Section 3.6.

Average elevation at the site ranges from approximately 900 feet above mean sea level (amsl) to 970 feet amsl. The general topography has a western sloping direction. Some portions of the site have slopes from 6 to 12 percent.

Radon is an invisible, radioactive gas generated during the breakdown of uranium in rocks and soils and tends to accumulate in below-grade areas of buildings, where the air circulation is restricted. Oakland county is designated as a Zone 2 area for radon, meaning predicted average indoor screening levels are at or below the USEPA's 4.0 pico-Curies per liter action level (ECS, 2024).

Federal agencies are required to evaluate impacts to prime or unique farmlands defined in the Farmland Protection Policy Act using U.S. Department of Agriculture (USDA) scoring criteria for identifying effects of conversion. During the Phase 3 expansion project, farmlands within the Phase 3 area were rated with preliminary farmland scores using USDA scoring criteria. The majority of soil units are listed as either prime farmland or farmland of local importance (USDA, 2024).

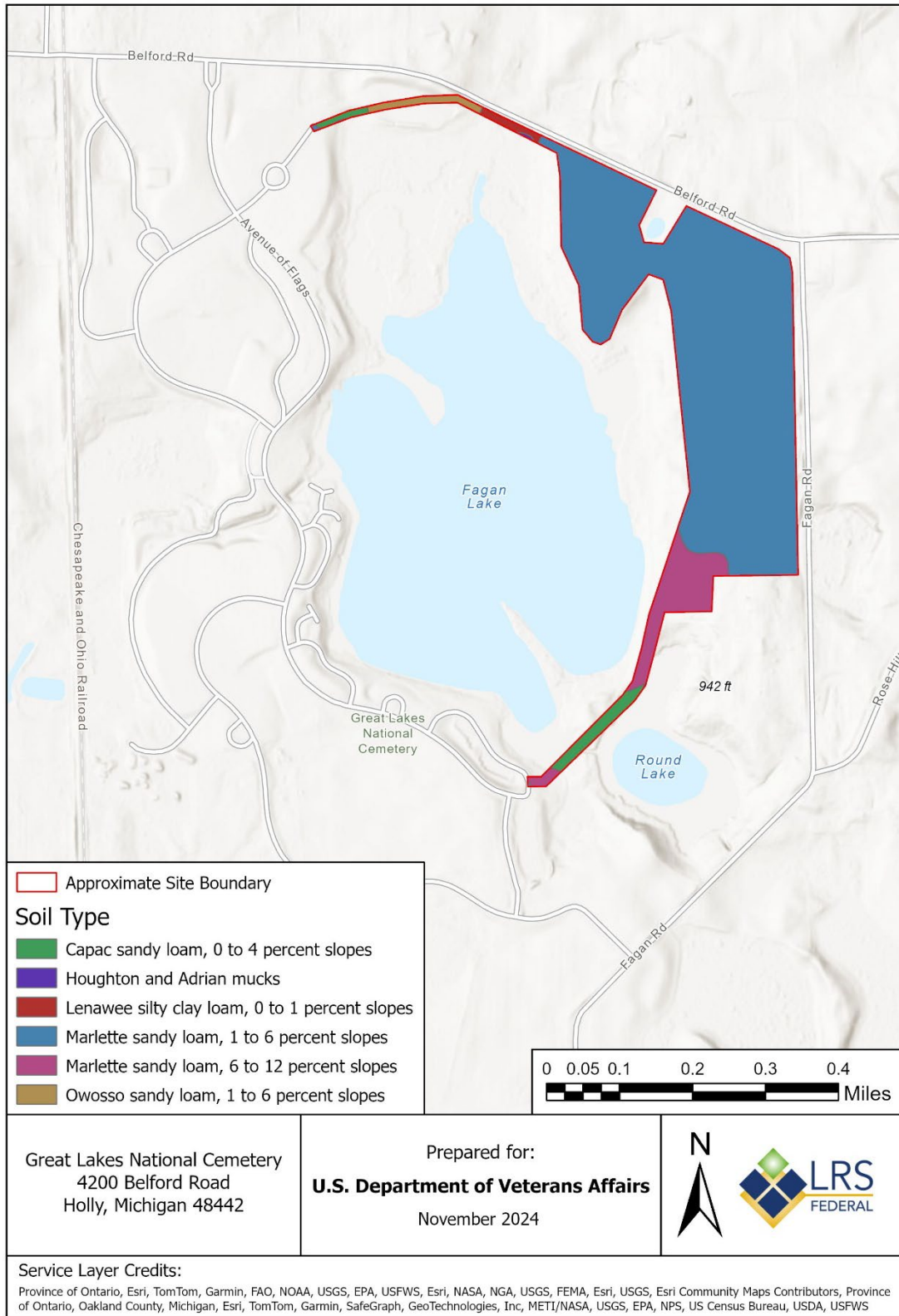


Figure 3-1. Soil Types at the Great Lakes National Cemetery Phase 3 Expansion Area

3.5.2 Environmental Consequences

3.5.2.1 Proposed Action

Grading during construction would change the topographic features of the site, influencing drainage patterns. However, final site grades are anticipated to follow or approximately match the existing site topography.

Short term soil erosion and sedimentation effects could occur as a result of the Proposed Action. Grading would strip current vegetation, disrupt the surface soil profiles, and cause soil compaction.

Construction and demolition debris that cannot be recycled or salvaged, would be disposed of offsite in accordance with Federal, State, and local waste management laws. Fill would be reutilized onsite for grading and suitable fill material would be imported as needed to level the site and achieve standards following excavation.

The Phase 3 expansion project would develop land classified by USDA as prime farmland and farmland of local importance; however, according to Oakland County, the area is zoned as Public/Institutional land and according to VA's 12-phase master plan for the Great Lakes National Cemetery, the planned land use for the undeveloped portions is for cemetery expansion. Therefore, VA does not need to engage in consultation with NRCS.

VA would need to obtain a National Pollutant Discharge Elimination System (NPDES) permit and a Soil Erosion and Sedimentation Control (SESC) permit, which would ensure that BMPs are included in construction plans. As such, impacts to topography, geology, and soils are expected to be less than significant.

3.5.2.2 No Action Alternative

Under the No Action Alternative, the Phase 3 expansion would not occur. As such, there would be no impacts to geology, topography, or soils at the site as a result of the No Action Alternative.

3.6 Hydrology and Water Quality

3.6.1 Affected Environment

Federal regulations related to stormwater include the Clean Water Act (CWA) of 1972, amended in 1987, which established the NPDES and Safe Drinking Water Act of 1974. Permits associated with these programs are issued through EGLE. Oakland County maintains Stormwater Engineering Design Standards, which states that the allowable 100-year post-development peak flow rate shall be approved by the Water Resources Commissioner office on a case-by-case basis.

Construction activities in Michigan that disturb one or more acres of land and have a point source discharge of stormwater to Waters of the United States (WOTUS) cannot be implemented without a NPDES permit from EGLE's Water Resources Division (WRD). A "Permit by Rule" (Rule 2190, promulgated under Part 31, Natural Resources Environmental Protection Act) process has been adopted by the WRD for stormwater coverage, which streamlines the permitting process. Applicants with sites disturbing one to five acres automatically receive stormwater coverage once they obtain a Part 91 permit. Applicants with sites disturbing five or more acres must obtain a Part 91 permit and submit a Notice of Coverage application, a copy of a SESC permit, approved SESC plan, site location map, and permit fee.

Due to the development occurring adjacent to the existing littoral perimeter of Fagan Lake, a Nationwide Permit 51 is required. The State of Michigan requires an Individual Permit for impact to Michigan Water

Features. A SESC permit is required by Oakland County, Michigan and will be applied for through and granted by Oakland County.

Additionally, the site is located in the Swartz Creek watershed, which the University of Michigan – Flint’s Center for Applied Environmental Research (CAER) has expressed concerns over with regards to water quality from current and historical land use impacts. In response, CAER, in collaboration with local units of government and the Flint River Watershed Coalition, created the Swartz Creek Watershed Management Plan, in which they identified Holly Township’s lack of setback ordinances which are encouraged for water quality protection. The plan also listed Holly Township as its second highest priority township in the watershed due to its relatively high water quality and expectations for continued development, reiterating its need for a setback ordinance.

3.6.2 Environmental Consequences

3.6.2.1 Proposed Action

The Proposed Action would necessitate construction and post-construction BMPs to address erosion and sedimentation control during construction, as well as stormwater mitigation throughout the design life. The onsite stormwater facilities would adhere to specific operations and maintenance procedures to ensure proper, long-term functionality.

Cumulatively, the Proposed Action projects would convert approximately 2.5 acres of pervious cover (overall) to impervious cover (hard surface). Currently, Phase 3 is anticipated to trigger stormwater requirements applicable to development, resulting in the need to manage site runoff with detention storage.

There will be a small impact to existing surface water at the site via revisions to the surface water topography which will have small impacts on surface water flow. At some point surface water will be directed to Fagan Lake through storm drainage, collecting storm water along the proposed roadways and directing it to propounded onsite detention ponds. Detention pond outfall will be directed to Fagan Lake. Based on the calculations provided in the Hydrology and Stormwater Report (Guidon Design, 2024), seven detention ponds are proposed at the site. The proposed flows from onsite basins into Fagan Lake are expected to decrease for all storm events by greater than 60 percent following development and installation of stormwater facilities.

The average depth of groundwater at the site is between 8.5 and 15 feet below existing ground level. If groundwater is encountered during other construction-related activities, groundwater engineering control would be implemented, such as the installation of underdrain systems beneath in-ground crypts to prevent water intrusion. The underdrain system would connect to the proposed storm sewer system to direct the water to Fagan Lake.

Additionally, as necessary, and as appropriate, VA would implement the following minimization, avoidance, and management measures to reduce potential adverse effects to surface water resources to acceptable, less-than-significant levels. These measures are fully developed as part of this EA, concurrent with the site design efforts. VA has considered the following State and local policies and would incorporate them in the final design as follows:

- Implement all pertinent Federal, State, and local regulatory requirements and use environmentally sensitive site design, stormwater pollution prevention controls, good engineering practices, and construction BMPs.

- Implement appropriate groundwater engineering controls and dewatering practices should groundwater be encountered during construction.
- Locate machinery servicing and refueling areas away from streambeds and washes to reduce the possibility and minimize the impacts of accidental spills or discharges.

Construction activities would comply, to the extent practicable, with local agencies' requirements to minimize adverse effects to WOTUS. Potential adverse effects will be minimized through parking lot vegetation and runoff controls as required by Holly Township. General construction practice BMPs would also be implemented to prevent any potential spills from construction vehicles from reaching regulated surface water resources. The listed minimization measures and BMPs would ensure construction and operation of the Proposed Action would result in short-term and less-than-significant adverse impacts to surface water and groundwater.

3.6.2.2 No Action Alternative

Under the No Action Alternative, no additional construction by VA would occur and there would be no effects to water resources beyond the current usage at the National Cemetery.

3.7 Wildlife and Habitat

Biological resources include living, native, or naturalized plant and animal species and the habitats within which they occur. Plant associations are referred to generally as vegetation, and animal species are referred to generally as wildlife. Habitat can be defined as the resources and conditions present in an area that support a plant or animal. This EA analyzes threatened, endangered, and otherwise protected species that have potential to occur near the Phase 3 development and improvements area. For purposes of this EA, biological resources are divided into four major categories: (1) Federal- and State-listed protected species, (2) migratory birds of conservation concern (BCC), (3) bald and golden eagles, and (4) vegetation.

3.7.1 Affected Environment

3.7.1.1 Federal and State Listed Species

Under the Endangered Species Act of 1973 (ESA), Federal agencies must ensure that any action they carry out or authorize is not likely to jeopardize the continued existence of any listed species or destroy or adversely modify its critical habitat.

The U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) system data, the USFWS Critical Habitat Portal, and the All Species Michigan Determination Key were all utilized to identify critical habitat and/or special-status species with potential to occur in the project area. Additionally, ECS Midwest, LLC (ECS) conducted a field reconnaissance of the project area on October 16 and 17, 2023 to support an ESA Biological Survey Review and Habitat Assessment. The biological survey indicated three Federally endangered, one Federally threatened, one proposed endangered, and one candidate species with potential to occur in the project area. The report did not identify any known occurrences of State-listed species in the project area; however, several of the federally-listed species included in the biological survey report are also State-listed species, as depicted in Table 3-2.

In summary, the following Federally- and/or State-listed species have potential to occur within the project area:

- Indiana Bat (Federally endangered, State endangered)
- Northern Long-eared Bat (Federally endangered, State threatened)
- Tricolored Bat (State threatened)

- Eastern Massasauga Rattlesnake (Federally threatened)
- Poweshiek Skipperling (Federally endangered, State endangered)

3.7.1.2 Migratory Birds of Conservation Concern

Birds of Conservation Concern are species that are priorities for conservation action associated with ecological Bird Conservation Regions. Designation as a BCC, in itself, does not carry with it regulatory protections. However, BCC species are protected under the Migratory Birds Treaty Act (MBTA). Under the MBTA, unless permitted by regulations, it is unlawful to 1) pursue, hunt, take, capture, or kill; 2) attempt to take, capture, or kill; and 3) possess, offer to sell, barter, purchase, deliver, or cause to be shipped, exported, imported, transported, carried, or received any migratory bird, part, nest, egg, or product, manufactured or not. USFWS regulations broadly define “take” under the MBTA to mean “pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to pursue, hunt, shoot, wound, kill, trap, capture, or collect.” Under the MBTA, “take” does not include habitat loss or alteration.

The USFWS IPaC identified Bald Eagles as having potential to occur in the project area. Bald Eagles are protected under both the MBTA and the Bald and Golden Eagle Protection Act (BGEPA). The BGEPA prohibits the take, possession, and transportation of bald and golden eagles or their parts, eggs, or nests without authorization (16 USC 668–688(d)). The USFWS may issue permits to take bald or golden eagles or their nests for certain activities, provided the taking is compatible with the preservation of these species (50 CFR Part 22).

The following BCC species, which are afforded protection under the MBTA, have potential to occur within the project area.

- Black-billed Cuckoo (*Coccyzus erythrophthalmus*)
- Bobolink (*Dolichonyx oryzivorus*)
- Canada Warbler (*Cardellina canadensis*)
- Cerulean Warbler (*Dendroica cerulea*)
- Chimney Swift (*Chaetura pelagica*)
- Golden-winged Warbler (*Vermivora chrysoptera*)
- Henslow’s Sparrow (*Ammodramus henslowii*)
- Lesser Yellowlegs (*Tringa flavipes*)
- Pectoral Sandpiper (*Calidris melanotos*)
- Red-headed Woodpecker (*Melanerpes erythrocephalus*)
- Rusty Blackbird (*Euphagus carolinus*)
- Wood Thrush (*Hylocichla mustelina*)

3.7.1.3 Vegetation

Vegetation provides habitat for wildlife species and helps maintain the water quality of nearby waterways by filtering and reducing the flow of runoff. Vegetation also helps prevent erosion.

The site consists of a large former agricultural field that borders Fagan Lake to the east and a forested area along the southern site boundary. A farm field drainage ditch is located on the north-central former agricultural field. The wooded area includes a palustrine forested wetland that bisected Fagan Lake (west) and Round Lake (east). The canopy of the forested area was dominated by red maple, slippery elm, and

shag-bark hickory. Buckthorn and multiflora rose were observed as the dominant understory species. The herbaceous species layer is dominated by swamp milkweed and cattails throughout the site.

Table 3-2. Evaluation of Special Status Species with Potential to Occur within the Great Lakes National Cemetery

Common Name (Scientific Name)	Status^a	Range or Habitat Requirements	Potential For Occurrence in Project Area
Mammals			
Indiana Bat (<i>Myotis sodalis</i>)	FE, SE	Indiana bats hibernate during winter in caves or, occasionally, in abandoned mines. In the summer, Indiana bats roost under loose tree bark on dead or dying trees.	No onsite caves; therefore, there is no suitable winter habitat. However, due to the wooded areas on site, potential summer roosting habitat is located on site.
Northern Long-eared Bat (<i>Myotis septentrionalis</i>)	FE, ST	This species roosts in cavities/crevices of live/dead trees in summer. Rarely roosting in structures such as barns / sheds. In winter, hibernate in caves with high humidity.	Forested areas with potential roosting sites, emergent wetlands, former farmland for foraging, and water access all provide possible habitat.
Tricolored Bat (<i>Perimyotis subflavus</i>)	Proposed FE, ST	This species roosts among leaf clusters of both live and dead deciduous hardwood trees as well as structures such as barns, porch roofs, bridges, concrete bunkers, and caves. Females exhibit high site fidelity, returning to the same summer roosting locations year after year. In winter, hibernate in caves above freezing with male and female fidelity to hibernaculum locations.	May occur. The combination of forested areas with potential roosting sites, emergent wetland areas and former farmland for foraging, and access to water observed may provide suitable habitat for this species.
Reptiles			
Eastern Massasauga (<i>Sistrurus catenatus</i>)	FT, ST	Massasaugas require winter hibernacula such as crayfish burrows in low water wetland areas. During the active season, they require high quality habitat of wetlands, sparse canopy cover and intermixed sunny upland areas.	The site consists of dense wetland areas and associated upland areas that may provide habitat suitable for the species to exist in the project area.
Insects			

Monarch Butterfly (<i>Danaus plexippus</i>)	FC	This species prefers to live in open meadow habitats with milkweed plants, which it requires for breeding and laying eggs.	The project site primarily consists of wetland areas, an agricultural field, and a small, forested area. Suitable habitat is limited.
Poweshiek Skipperling (<i>Oarisma Poweshiek</i>)	FE, SE	The Poweshiek skipperling are normally found in grassy habitats including wet-to-dry native prairies, moist and sedge meadows, grassy lake and stream margins, and prairie fens. The Poweshiek skipperling relies on remaining remnant native prairies and has not been found in reconstructed prairies.	Remnant native prairies were not identified in the project site and limited prairie margins were observed adjacent to disturbed areas. Suitable habitat is limited.
^a Federal Status: FE = Endangered, FT = Threatened, FC = Candidate, Michigan State Status: SE = Endangered, ST = Threatened.			

3.7.2 Environmental Consequences

3.7.2.1 Proposed Action

Every possible effort to minimize any direct or indirect impact on species will be adhered to by VA; therefore, incidental mortality or displacement of individual birds protected under the MBTA is not expected to occur due to construction disturbance (e.g., vegetation removal, noise). Mobile individuals (e.g., adults) would be expected to move to adjacent habitats in response to habitat loss or disturbance. VA will limit vegetation removal to occur only between October 1 through March 31 to avoid impacts to migratory birds that could be roosting, hatching, or nesting in the area between April and October. The project area contains limited suitable habitat for nesting and foraging bald eagles. Although bald eagles could occur in the project area, no bald eagle nests were identified within the project area during the field reconnaissance and as such, no direct or indirect impacts to the species are anticipated for the project. VA would assess all areas proposed for disturbance for the presence of nesting birds prior to removing vegetation.

VA initiated Section 7 consultation with USFWS on April 18, 2024, to request concurrence for VA's determination of effects as shown in Table 3-3. USFWS recommended that VA limit tree clearing during the bat active season (April through October) and/or the non-volant period (June through July) and minimize the extent of impacts to forests, wetlands, and riparian habitats. Regarding the Tricolored Bat, USFWS stated that adverse effects are likely to result when trees near hibernacula are cleared during the fall, spring, and possibly summer months. While the Tricolored Bat is not currently a federally listed species, USFWS announced a proposal to list the Tricolored Bat as endangered in September 2022. If a final rule is published listing the Tricolored Bat as endangered, USFWS will provide additional information on evaluating projects for potential impacts.

Concurrence for VA's determination that the project is not likely to adversely affect the Eastern Massanuga and Poweshiek Skipperling was received from the USFWS Michigan Ecological Services Field Office on June 14, 2024 (Appendix B.2). In case the snake may be present, the project site will be reviewed during its active season (April-September) by a qualified ecologist and individual experienced in surveying the species, to confirm presence or absence. If the species is observed on the project site, additional consultation with USFWS may be necessary.

Although the Monarch Butterfly is not currently a listed species, it is not protected by the ESA; however, USFWS provided BMP recommendations to reduce potential impacts to the species, which include:

- Planting a diverse group of native plant species to help support the nutritional needs of Michigan's pollinators
- Leaving areas un-mowed to minimize the impacts from mowing during spring and summer.
- Leaving areas unraked and leaving plant stems standing in the fall.
- Avoiding or limiting pesticide use.
- Planting native wildflowers to reduce the need to mow and water, improve bank stabilization by reducing erosion, and improve groundwater recharge and water quality.

The Michigan Department of Natural Resources reviewed the Phase 3 development project in October 2024 and noted the potential impact resulting from construction of a road through the wetland complex (between Fagan Lake and Round Lake) on the southern portion of the site. This aforementioned zone may impede reptile and amphibian movements throughout the wetland. The installation of concrete culverts will minimize biological impacts.

Table 3-3. Effect Determinations for Special Status Species

Common Name (<i>Scientific Name</i>)	Status ^a	Effect Determination
Indiana Bat (<i>Myotis sodalis</i>)	FE, SE	Not likely to adversely affect.
Northern Long-eared Bat (<i>Myotis septentrionalis</i>)	FE, ST	Not likely to adversely affect.
Tricolored Bat (<i>Perimyotis subflavus</i>)	FE, ST	Not likely to adversely affect.
Eastern Massasauga (<i>Sistrurus catenatus</i>)	FT, ST	May effect, not likely to adversely affect.
Monarch butterfly (<i>Danaus plexippus</i>)	FC	May affect.
Poweshiek Skipperling (<i>Oarisma Poweshiek</i>)	FE, SE	May affect.
^a FE = Endangered, FT = Threatened, FC = Candidate, Michigan State status: SE = Endangered, ST = Threatened.		

3.7.2.2 No Action Alternative

Under the No Action Alternative, construction and operation of the Phase 3 expansion project would not occur. Therefore, no additional impacts to wildlife or habitat over existing conditions would occur as a result of VA's continued actions.

3.8 Noise

High noise levels that occur over a long duration can impact the health of exposed populations and be a nuisance to the surrounding community. This EA analyzes noise from potential construction and demolition activities using the A-weighted decibel scale (dBA), which is a logarithmic scale generally

used to measure noise levels because it can account for the sensitivity of the human ear across the frequency spectrum.

3.8.1 Affected Environment

The primary noise sources in the vicinity of the Great Lakes National Cemetery are:

- Intermediate to heavy traffic from the intersecting railroad, surrounding two lane roads, and Interstate 75
- Routine maintenance, including the use of lawnmowers and leaf blowers and periodic construction activities can create noise
- Ceremonial rifle salutes that create short bursts of noise and are audible in the immediate surroundings during committals, which occur only during weekday business hours

The Noise Control Act of 1972, with its subsequent amendments (Quiet Communities Act of 1978, 42 USC § 4901-4918), delegates to the States the authority to regulate environmental noise and directs government agencies to comply with local community noise statutes and regulations. Section 18-55 of the Holly Township, Michigan Code of Ordinances states construction noises before 7:00am and after 10:00pm on public or private property and clearly audible beyond the property line are a per se violation.

Sensitive noise receptors in the vicinity of the Proposed Action primarily include rural residential areas along Belford Road and Fagan Road.

3.8.2 Environmental Consequences

3.8.2.1 Proposed Action

The Proposed Action would be expected to have minor, short-term and negligible, long-term, adverse effects on sensitive noise receptors, specifically the existing Great Lakes National Cemetery.

Construction activities associated with the Proposed Action would result in minor, short-term, adverse effects. Construction-related noise would vary throughout the construction process and depend on the quantity and type of equipment and tools being used, as well as operating schedules. Construction activities would be typical of construction projects of this scale and would include transport, site preparation, excavation, placement of foundations, and paving. The greatest source of noise would be construction equipment utilizing internal combustion engines, including, but not limited to, excavators, front-end loaders, bulldozers, dump trucks, utility trucks, and forklifts.

Long-term operational noise within the area of the Proposed Action would be consistent with the existing cemetery operations associated with maintenance activities and ceremonial rifle salutes.

Data from the United States Department of Housing and Urban Development's (HUD's) online Day/Night Noise Level (DNL) tool, Michigan Department of Transportation, and the Federal Railroad Administration's Office of Safety Analysis concludes that the anticipated, approximate ambient noise level during the construction of the Phase 3 expansion area is 46 decibels, while the anticipated, approximate ambient noise level during its operation is 38 decibels.

Table 3-4 shows the DNLs during construction and operation of the Proposed Action from surrounding roads calculated by HUD's DNL tool, while Table 3-5 shows the DNLs during construction and operation of the Proposed Action from surrounding railroads.

Table 3-4. DNL of Roads Local to The Great Lakes National Cemetery in dBA (ECS, 2024)

Road Name	DNL
Belford Road	54
Fagan Road	42
Interstate 75	50

Table 3-5. DNL of Railroads Local to The Great Lakes National Cemetery in dBA (ECS, 2024)

Railroad Crossing	DNL
2323372U	35
232338B	33
232339H	30

The VA will use every action possible to minimize noise during construction of the proposed action through equipment controls. Noise-producing work will be performed in less sensitive hours of the day or week as directed by the Contracting Officer's Representative. These hours, according to Section 18–55 of the Holly Township, Michigan Code of Ordinances, are between 7:00am and 10:00pm.

Per the VA's NCA Master Construction Specifications, equipment controls for construction noise minimization include:

- The maintenance of maximum permissible construction equipment noise levels as measured with an A-scale decibel measuring device at 15 meters, or 50 feet (Table 3-6)
- The provision of soundproof housing or enclosures for noise-producing machinery
- The use of efficient silencers on equipment air intakes
- The use of efficient intake and exhaust mufflers on internal combustion engines
- Lining of hoppers and storage bins with sound deadening material

Table 3-6. Maximum Permissible Construction Equipment Noise Levels (NCA Master Construction Specifications)

Category of Equipment			
Earthmoving		Materials Handling	
Equipment Style	Sound Level dBA	Equipment Style	Sound Level dBA
Front Loaders	75	Concrete Mixers	75
Backhoes	75	Concrete Pumps	75

Dozers	75	Cranes	75
Tractors	75	Derricks Impact	75
Scrapers	80	Pile Drivers	95
Graders	75	Jack Hammers	75
Trucks	75	Rock Drills	80
Pavers, Stationary	80	Pneumatic Tools	80
Pumps	75	Blasting	//--//
Generators	75	Saws	75
Compressors	75	Vibrators	75

3.8.2.2 No Action Alternative

Under the No Action Alternative, the noise levels to surrounding properties would not change from current cemetery operations. No adverse noise effects presently occur. The noise environment of the site would not be altered by VA's actions.

3.9 Land Use

3.9.1 Affected Environment

The project area occurs within one USEPA Level IV Ecoregion, Lansing Loamy Plain, although a majority of Oakland County, Michigan occurs within the Level IV Ecoregion of Interlobate Dead Ice Moraines. The Lansing Loamy Plain Ecoregion is covered by medium-textured loamy soils, such as Marlette, and Ithaca soils, and coarser-textured soils on outwash areas and end moraines. Many medium-textured loams in the region have been converted to row crops and pasture. The proposed expansion site, located in a rural area, is undeveloped and vegetated, with a majority of the site covered by Marlette sandy loam.

In the early 20th century, some of the site was developed for residential purposes while the rest remained undeveloped or used for agricultural purposes. Agricultural uses of the land continued well into the 20th century, with the Great Lakes National Cemetery developed adjacent to it in 2005 and portions of the site remaining undeveloped by 2020. Portions of the surrounding land are used for residential purposes or undeveloped, with agricultural cropland to the east and Fagan Lake and the Great Lakes National Cemetery to the west. The current zoning map was obtained from Oakland County, Michigan, as seen in Figure 3-2.

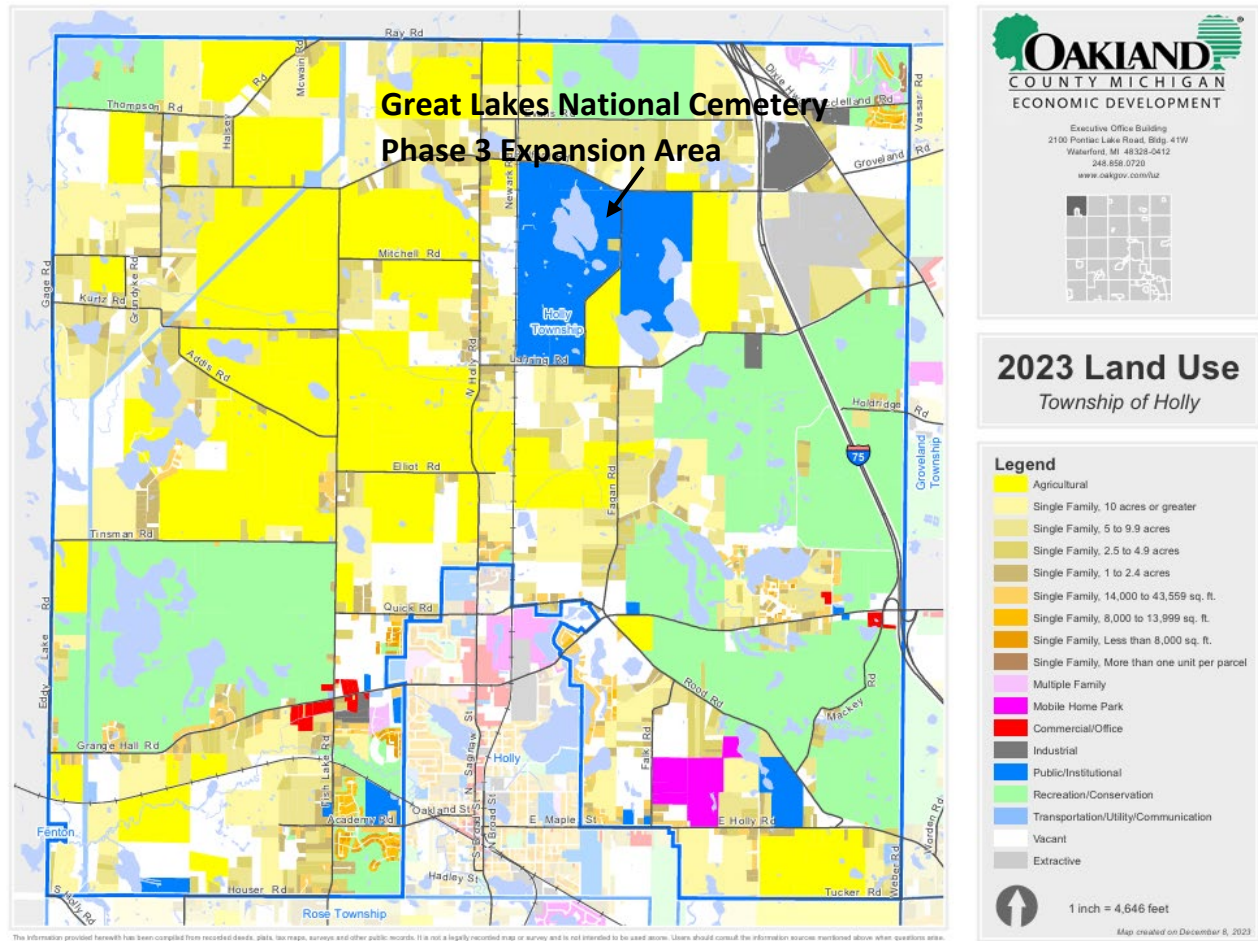


Figure 3-2. Oakland County Zoning Map

3.9.2 Environmental Consequences

3.9.2.1 Proposed Action

Construction of the Proposed Action would have no impact on land use. According to Oakland County's 2023 Land Use map, the land where the Proposed Action is located is zoned as Public/Institutional land. Holly Township's latest land use map, revised in 2004, zones the land where the Proposed Action is located as Agricultural Residential; however, the more recent zoning designation from Oakland County will be referred to in this report. Holly Township's latest land use map, revised in 2004, zones the land where the Proposed Action is located as Agricultural Residential; however, the more recent zoning designation from Oakland County is considered for this assessment. Although VA makes all reasonable attempts to integrate its activities with local zoning, VA, as a federal agency operating on Public/Institutional lands, is not subject to local zoning regulations.

Areas directly surrounding the National Cemetery are zoned for Single Family residential use and Agricultural use, with adjoining land east of the Proposed Action also zoned for Public/Institutional land use. No adverse impact to land use is anticipated under the Proposed Action.

3.9.2.2 No Action Alternative

Under the No Action Alternative, no land use effects would occur. The project area would remain unmaintained and be clear to be developed in accordance with its designation as Public/Institutional lands.

3.10 Floodplains, Wetlands, and Coastal Management

3.10.1 Affected Environment

3.10.1.1 Floodplains

The Phase 3 expansion is partially located within a Special Flood Hazard Area designated as Zone A, according to Flood Insurance Rate Map Panel 26125C0151F (September 29, 2006). The remainder of the site is located within Zone X, an area of minimal flood hazard. Zone A areas are determined to be within the 100-year floodplain and do not have designated base flood elevations (BFEs) or floodways; therefore, these areas still require coordination with local development authorities and should provide a pre-project and proposed project analysis to assist local community officials in understanding the project's effects prior to permitting or construction. A Conditional Letter of Map Revision submission may be requested if the project is found to increase the BFE more than 1.0 foot at any point in the vicinity of the proposed project.

3.10.1.2 Wetlands and Other Water Resources

Jurisdictional WOTUS, including streams and wetlands, are defined by 33 CFR 328.3 and are protected by Section 404 of the CWA (33 USC 1344), which is administered and enforced by the U.S. Army Corps of Engineers (USACE).

As provided by the USFWS National Wetlands Inventory database and ECS Wetland Delineation report for the proposed expansion site, twelve wetlands, four streams, and one lake, this being Fagan Lake, are present within the project location area as depicted in Figure 3-3.

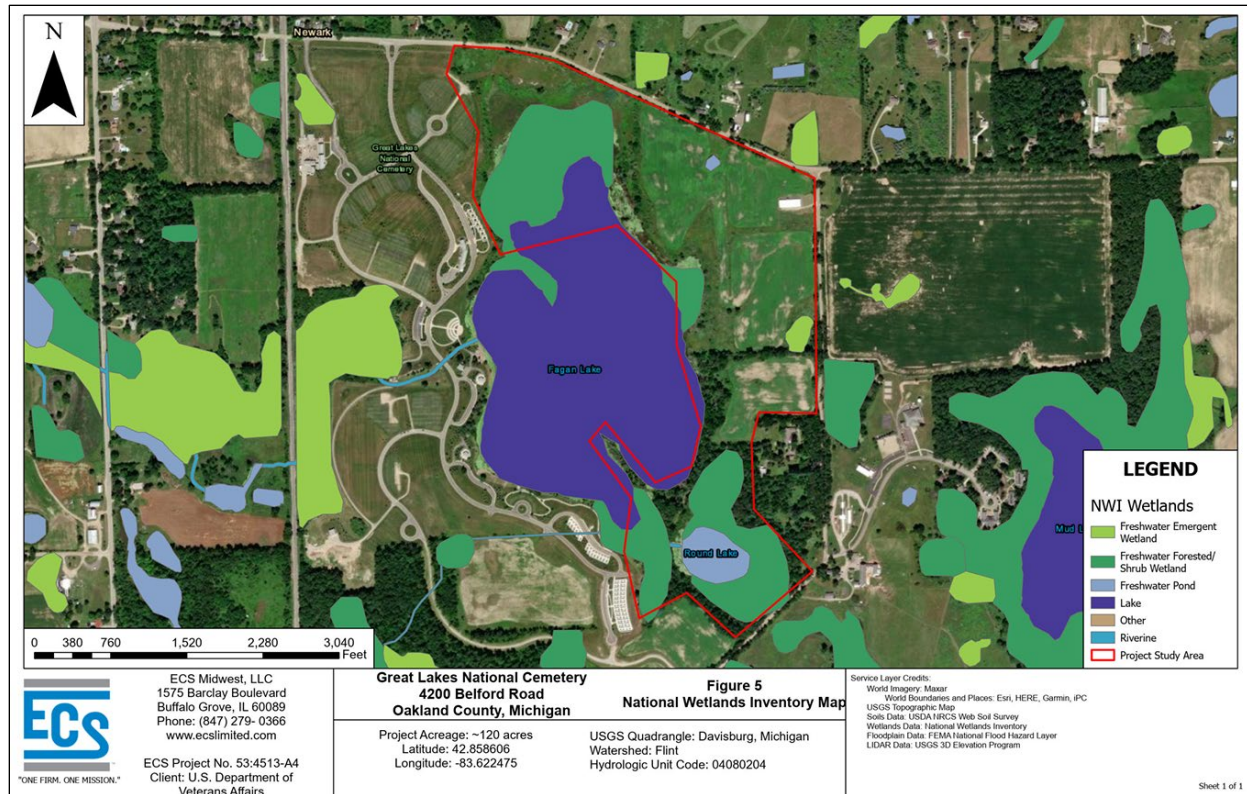


Figure 3-3. National Wetland Inventory Map (ECS, 2024)

3.10.1.3 Coastal Management.

The proposed site is not within the Coastal Zone Management Act boundary and therefore, is not an area of concern regarding coastal management.

3.10.2 Environmental Consequences

3.10.2.1 Proposed Action

Due to the presence of potentially jurisdictional wetland areas, streams, and lake, a Jurisdictional Determination from the USACE is needed before earth-disturbing activities occur.

As per regulations within Section 404 and Section 401 of the CWA, mitigation and stormwater management plans are needed for permitting for the proposed site. In Michigan, mitigation thresholds are 0.1 acres and 0.01 acres of wetlands and stream bed, respectively. If 0.5 acres or more of WOTUS or 0.05 acres or more of jurisdictional stream channel is impacted, an Individual Permit may be required from USACE. Approximately 37.4 acres of wetlands, 847 linear feet of streams, and 12.4 acres of Fagan Lake were identified within the study area, as shown in Figure 3-4 (ECS, 2024). These delineated features are not fully located within the proposed Phase 3 expansion area, and therefore, only a portion of these features are anticipated to experience temporary impacts from construction activities.

Impacts from the proposed construction of a road through the wetland complex between Fagan Lake and Round Lake on the southern portion of the site would be minimized through the installation of concrete culverts that would support existing hydrology. VA recognizes the federal protection of wetlands and would comply with CWA Section 404 permitting requirements.

The Michigan Department of Environmental Quality's Nonpoint Source Best Management Practices on Riparian Buffers recommends a riparian buffer with a minimum of 50 feet, increasing to include the 100-year floodplain, steep slopes, adjacent wetlands, or higher-order streams.

VA will obtain the necessary permits from USACE and water quality certification from the EGLE Water Resources Division for temporary impacts to jurisdictional waters. Since a portion of the Proposed Action is within a floodplain, a Permit for Floodplain Development would be required from the United States Federal Emergency Management Agency.

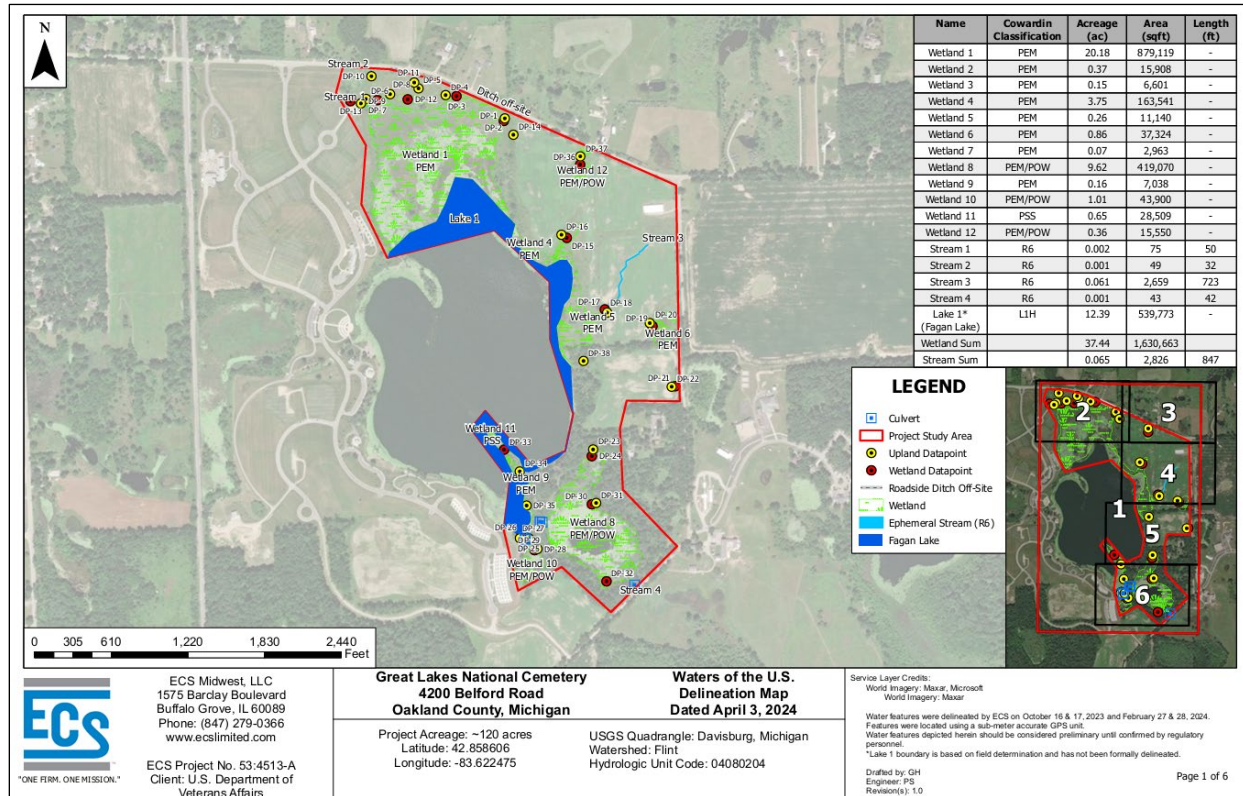


Figure 3-4. Waters of the U.S. Delineation Map (ECS, 2024)

3.10.2.2 No Action Alternative

Under the No Action Alternative, construction of the Proposed Action projects would not occur. No impacts to floodplains or wetlands would occur as a result of VA's actions.

3.11 Socioeconomics

3.11.1 Affected Environment

Socioeconomics can be characterized as the demographics, employment, and income of a region. U.S. Census Bureau data from the 2022 and 2023 American Community Survey 1-year estimates were used (U.S. Census Bureau, 2023). The State of Michigan, Oakland County, and Holly Township were compared to better understand the demographics of the project site location within the broader context of the region.

Holly Township has a lower minority and Hispanic population than Oakland County and the State of Michigan and higher Veteran population than Oakland County (Table 3-7).

Table 3-7. Population and Veteran Status in Michigan, Oakland County, and Holly Township

Geographic Area	Population	Population Under 18 Years	Population 65 Years and Over	Minority	Hispanic	Veterans
Michigan	10,037,261	21.0%	19.3%	26.2%	6.0%	5.6%
Oakland County	1,270,426	20.0%	19.1%	30.6%	5.1%	4.7%
Holly Township	12,081	20.5%	17.2%	8.3%	4.0%	4.8%

The median household income in Holly Township is comparable to that in the State of Michigan but lower than the median household income in Oakland County (Table 3-8). The poverty rate is lower in Holly Township than in the State of Michigan, while the unemployment rate in Holly Township is higher than Oakland County and the State (U.S. Census Bureau, 2024).

Table 3-8. Income, Poverty, and Employment Status in Michigan, Oakland County, and Holly Township

Geographic Areas	Number of Households	Median Household Income	Poverty Status in the Past 12 Months	Unemployment Rate
Michigan	4,107,809	\$69,183	13.5%	4.5%
Oakland County	533,533	\$92,015	8.1%	3.8%
Holly Township	4,910	\$69,943	9.3%	8.2%

There are no schools or playgrounds in the immediate area of the site.

3.11.2 Environmental Consequences

3.11.2.1 Proposed Action

Construction associated with the Proposed Action would likely result in short-term, direct, and beneficial impacts to local employment and personal income. Construction would provide temporary construction jobs and could have short-term socioeconomic benefits to the immediate area and local economy. Long-term beneficial impacts associated with the proposed projects include providing Veteran families in the region with reasonable access to VA interment options and providing the public with upgraded infrastructure and facilities at the cemetery. The additional development at the cemetery, requiring maintenance and upkeep, could also provide long-term employment benefits to the area.

Based on similar projects, there would not likely be impacts to child populations. The construction sites would be secured to prevent unauthorized access by children and others. BMPs would be implemented during construction to minimize and control construction noise and fugitive dust, which would minimize adverse impacts to child populations.

3.11.2.2 No Action Alternative

Under the No Action Alternative, the western extent of the National Cemetery would remain undeveloped. There would be no impacts related to socioeconomics associated with the No Action Alternative.

3.12 Community Services

3.12.1 Affected Environment

The Great Lakes National Cemetery is located within the Holly Area School District. The closest school is Holly Middle School, located approximately 3.8 miles south of the cemetery.

The Michigan State Police and the North Oakland County Fire Authority serve Holly Township.

There are no hospitals located in Holly Township. A nearby hospital serving the Holly Township community is the Ascension Genesys Hospital in Grand Blanc Township. There is also Holly Urgent Care located in the Village of Holly.

There are several parks located in and near Holly Township, including Seven Lakes State Park, Rose Oaks, Springfield Oaks, Groveland Recreation Area, Holly Recreation Area, Sorensen Park, and Heritage Homestead.

Public transportation in the area is served by the Western Oakland County Transportation Authority which provides transportation to seniors, adults with disabilities, veterans, and low-income families throughout Oakland County, including Holly Township.

3.12.2 Environmental Consequences

3.12.2.1 Proposed Action

The Proposed Action is not expected to place additional substantial demands on police, fire protection, or other emergency services in the area. The Proposed Action is not anticipated to have a significant impact on transportation service demands. Any short-term road closures would be coordinated with the local emergency and transportation services in the area. Parks near the Great Lakes National Cemetery will not be impacted by the Proposed Action.

3.12.2.2 No Action Alternative

Under the No Action Alternative, construction of the Proposed Action projects would not occur. There would be no impacts related to community services associated with the No Action Alternative.

3.13 Solid Waste and Hazardous Materials

The Resource Conservation and Recovery Act (RCRA) defines solid waste as, “any material that is discarded or disposed.” Solid wastes become hazardous wastes when they exhibit a characteristic of ignitability, corrosivity, reactivity, or toxicity, or are otherwise listed specifically as a hazardous waste. Hazardous materials typically found in the built environment include, but are not limited to, materials containing asbestos, polychlorinated biphenyls, lead, crystalline silica, and mercury. These materials often do not pose a hazard to human health or the environment under their intended uses but can have detrimental impacts when they are removed or disturbed.

3.13.1 Affected Environment

A Phase I Environmental Site Assessment was conducted by ECS on the Phase 3 expansion area in October 2023. No Recognized Environmental Conditions or Controlled Recognized Environmental Conditions were found.

Features, activities, uses, and/or conditions indicating the presence or likely presence of hazardous substances or petroleum products at the subject property due to a release to the environment; likely release to the environment; under conditions that pose a material threat of a future release to the environment were not identified by ECS.

3.13.2 Environmental Consequences

3.13.2.1 Proposed Action

During construction, the presence and use of petroleum and hazardous substances could increase the potential for accidental release or spill of oil, diesel, gasoline, and antifreeze. A Pollution Incident Prevention Plan is required if the total aggregate capacity of oil and oil-containing product containers within the Great Lakes National Cemetery Phase 3 expansion area equals or exceeds 1,320 gallons at any time during the construction period, per 40 CFR 112 and Part 5 of the Michigan Administrative Code of the EGLE. Standard construction BMPs would be implemented to mitigate and minimize potential impacts, including proper storage and appropriate labeling of petroleum products and hazardous materials in approved containers; storage of containers on a level and impervious surface; and use of secondary containment systems around fuel storage containers during refueling activities. Should a spill or release occur, any impacted soil would be properly handled per Federal and State laws and regulations.

A fueling station and 500-gallon diesel fuel aboveground storage tank are proposed for installation at the cemetery. The presence of the fuel tank is not anticipated to result in adverse impacts at the cemetery. VA would follow all appropriate fueling procedures to prevent leaks or spills. Waste generated after construction and during operation of the National Cemetery would be managed in compliance with Federal and State laws and regulations.

Based on the enforcement of BMPs during construction activities and the absence of long-term increases in hazardous waste at the site, the Proposed Action is anticipated to result in less than significant impacts from solid waste and hazardous materials to the National Cemetery and surrounding areas.

3.13.2.2 No Action Alternative

Under the No Action Alternative, construction of the Proposed Action projects would not occur. No impacts from solid waste or hazardous materials would occur as a result of VA's actions.

3.14 Traffic, Transportation, and Parking

Transportation systems include the vehicles and infrastructure necessary to convey people and goods from one location to another. This section focuses on traffic congestion for local roads and highways, which can affect the quality of life of employees, visitors, and neighboring residents.

Transportation vehicles can emit GHGs and regulated air pollutants such as CO, NO₂, and particulate matter. Additionally, traffic congestion and idling on roads and highways can cause increased air pollution. Section 3.2 discusses the air quality impacts associated with mobile vehicle use.

3.14.1 Affected Environment

A Traffic Impact Study was completed in October 2024 that analyzed the impacts of the Phase 3 expansion of the Great Lakes National Cemetery in Holly Township, Oakland County, Michigan

(Fishbeck, 2024). The study collected vehicular turning movement counts, conducted operational analyses for existing and future conditions, and simulated synchro network models to evaluate network operations. The study collected vehicular turning movement counts at four major study intersections; projected background traffic growth; and conducted a crash analysis according to the methodologies and guidance published by the Institute of Transportation Engineers, American Association of State Highway Transportation Officials, Michigan Department of Transportation, and Road Commission for Oakland County (RCOC).

Major roads and roadways in the vicinity of the National Cemetery include:

- Holly Road
- Belford Road
- Fagan Road

Data from the Southeast Michigan Council of Government Roadway Jurisdiction and Traffic Count Database System online maps describes major roadway characteristics (Table 3-9).

Table 3-9. Roadway Characteristics at the Great Lakes National Cemetery

Roadway	Jurisdiction	Speed Limit (mph) ^a	No. of Lanes	Roadway Classification	Direction	AADT ^b (vpd) ^c
Holly Road	RCOC	55	2 (1 each direction)	Minor arterial	2-way	9750 (2024), north of Belford Road
					2-way	9600 (2024), north of Mitchell Road
Belford Road	RCOC	55	2 (1 each direction)	Major collector	2-way	590 (2024), east of Holly Road
					2-way	300 (2024), west of Holly Road
Fagan Road	RCOC	55	2 (1 each direction)	Local road	2-way	200 (2024), between Belford Road and Lahring Road
^a mph = miles per hour ^b AADT = Average Annual Daily Traffic ^c vpd = vehicles per day						

Traffic operations performance is measured through Highway Capacity Manual (HCM) 6th Edition operational analyses by Synchro traffic-analysis software to determine Level of Service (LOS). LOS is a categorization of the performance, ranging from A to F, which is related to the average vehicle delay, where LOS A represents minimal vehicle delay, LOS E represents an intersection operating at full capacity, and LOS F represents failing conditions with excessive delay.

The current LOS is shown for each major intersection in the vicinity of the Great Lakes National Cemetery (Table 3-10). Currently, there are no intersections that have a failing LOS and all intersections have an LOS rating of C or higher.

Table 3-10. Level of Service at Major Intersections Surrounding the Great Lakes National Cemetery

Intersection	LOS/Delay (seconds), Overall	
	a.m. Peak Hour	p.m. Peak Hour
Holly Road and Belford Road (Minor Stop-Controlled)	A 1.8	A 2.6
Belford Road and Great Lakes National Cemetery west driveway (Minor Stop- Controlled)	A 0.4	A 1.2
Belford Road and Great Lakes National Cemetery east driveway (Minor Stop- Controlled)	A 0.5	A 1.8
Belford Road and Fagan Road (Minor Stop-Controlled)	A 2.0	A 0.5

A crash analysis was also done within the Traffic Impact Study using crash data from all studies intersections and roadway segments fronting the Great Lakes National Cemetery from 2019 to 2023 taken from the Michigan Traffic Crash Facts website (Fishbeck, 2024). All crashes occurred within the footprint of the Holly Road and Belford Road intersection. The crash data is categorized as: (A) serious injury; (B) minor injury; (C) potential injury; and (PDO) property damage only (Table 3-11).

Table 3-11. Crash Analysis Summary for 2019-2023 Surrounding the Great Lakes National Cemetery

Crash Type	Total Crashes	Fatal	A	B	C	PDO
Angle	5	0	0	0	0	5
Head-on Left-Turn	3	1	0	0	1	1
Rear-end	2	0	0	1	0	1
Total	10	1	0	1	1	7

3.14.2 Environmental Consequences

3.14.2.1 Proposed Action

Based on the findings of the October 2024 Traffic Impact Study, the Great Lakes National Cemetery Phase 3 expansion will not result in any significant operational/safety impacts to its adjacent road network. Therefore, the Proposed Action does not require traffic mitigations. No intersections operate below the minimum acceptable VA threshold for significant traffic impacts in any of the examined scenarios.

During Proposed Action construction activities, there would be an increase in construction vehicles that would likely contribute to a temporary increase in traffic volumes, minor congestion, and possibly detours. Impacts to traffic during construction would be temporary and localized.

The anticipated LOS at major intersections in the vicinity of the site under the Proposed Action in 2034 is shown in Table 3-12. Currently, there are no intersections that have a failing LOS and all intersections have an LOS rating of D or higher, except for westbound (WB) Belford Road of the Holly and Belford Road intersection, where its left turn/thru movements operates at LOS E in the p.m. peak hour. From existing to future conditions, WB left turn/thru movement delay increased 7.8 seconds per vehicle (sec/veh) (from 31.0 sec/veh to 38.8 sec/veh) (Fishbeck, 2024).

Table 3-12. Level of Service at Major Intersections for 2034 Future Conditions

Intersection	LOS/Delay(s), Overall	
	a.m. Peak Hour	p.m. Peak Hour
Holly Road and Belford Road (Minor Stop-Controlled)	A 2.0	A 2.8
Belford Road and Great Lakes National Cemetery west driveway (Minor Stop- Controlled)	A 1.2	A 1.7
Belford Road and Great Lakes National Cemetery east driveway (Minor Stop- Controlled)	A 0.4	A 1.7
Belford Road and Fagan Road (Minor Stop-Controlled)	A 2.2	A 0.9
Fagan Road and Great Lakes National Cemetery driveway (Minor Stop-Controlled)	A 1.3	A 1.5

The VA threshold for significant traffic impacts is defined in 38 CFR 26(2)(ii) as “an increase in average annual daily traffic volume (AADT) of at least 20 percent on access roads to the site or the major roadway network.” As a result of the proposed cemetery expansion, the AADT increase to the roadway network that surrounds the cemetery on Holly Road is 10 percent and on Belford Road and Fagan Road is five percent, which is below VA’s standard threshold for significance of 20 percent. The proposed site-

access configuration will appropriately facilitate site ingress and egress. The findings of the HCM operational analyses and crash data conclude that there are no recommended improvements to the study intersections.

3.14.2.2 No Action Alternative

Under the No Action Alternative, the proposed phased cemetery expansion would not occur. No impacts to traffic, transportation, or parking would occur as a result of VA's actions. The proposed Phase 3 Gravesite Development and Improvement Project Area would remain primarily undeveloped.

3.15 Utilities

3.15.1 Affected Environment

A Utilities Identification and Capacity Report was completed in April 2024 for the Great Lakes National Cemetery. A description of the availability of utilities, including electric, natural gas, potable water, irrigation, stormwater, and wastewater services, to the cemetery is summarized below.

- A new electrical service will be required as no electrical utilities currently exist close to the project area on the east side of Fagan Lake. This electrical service will be fed from Consumer Energies utility power line on Fagan Road. From this utility line to a 4160/480-volt pad mounted transformer next to the pump house, a new electrical duct bank will be installed. In the pump house, a new 480/277-volt, 3-phase electrical distribution panel will be installed. The 480-volt panel will serve larger electrical loads as well as be the source for a 480-208/120-volt dry-type transformer.
- No additional gas services are proposed for Phase 3 expansion as there are existing propane tanks on site serving the Administration Building located to its north.
- The cemetery's current irrigation system uses a pump to draw water from Fagan Lake to service previous expansions, while the Phase 3 expansion is located on the opposite side of the lake from the existing pump. The facility's existing pump is not sufficient to service the Phase 3 expansion area. The new pumping system design provides the permanent infrastructure sized to irrigate the expansion area in an 8-hour watering window at peak season with a pump station estimated to have a minimum capacity of 650 gallons per minute at a discharge pressure of 95 pounds per square inch. There will be two equally sized main pumps, one for normal operation and the other for back-up if the first fails. A pressure maintenance pump can be used for low flow as-needed daytime watering and maintaining pipe pressure if the main pumps are off.
- Existing sanitary service is provided through septic fields with the Administration Building being serviced by a field located to its north, the Honor Guard Building being serviced by a field to its southwest, and the maintenance facilities being serviced by a field located to their northeast. No additional sewer services have been proposed for the Phase 3 expansion.
- The cemetery's existing storm sewer system consists of multiple outfalls that discharge towards Fagan Lake and existing wetlands. The Phase 3 expansion will require an expansion of the system but will remain independent from existing outfalls, and instead, the outfalls will convey stormwater to various proposed stormwater management facilities within the expansion area. Improvements to the existing storm sewer system have been proposed for the Administration Building staff parking and the materials storage/spoils area but are not predicted to have any adverse effect on the existing storm sewer system.

- Water service is currently provided to the Administration and Honor Guard Buildings via a well located east of the building while the maintenance facilities are serviced by a different well located to their southeast. No additional water services are proposed for the Phase 3 expansion.

3.15.2 Environmental Consequences

3.15.2.1 Proposed Action

The Proposed Action would increase the consumption of utilities, including electricity, irrigation water, and stormwater discharges. These major utilities are already provided to the Great Lakes National Cemetery and would likely have the capacity to meet forecasted demands; however, each utility provider would be required to review final designs and plans to determine if anticipated demands for utilities can be met.

Additionally, the Proposed Action accounts for the anticipated need for additional stormwater detention capacity within the Phase 3 expansion area; therefore, there are no significant impacts to utilities anticipated as a result of the proposed projects.

3.15.2.2 No Action Alternative

Under the No Action Alternative, the proposed Phase 3 expansion area would remain undeveloped. There would be no impacts related to utilities associated with the No Action Alternative.

3.16 Environmental Justice

Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

This section analyzes the presence of minority and low-income populations and existing pollution exposure for the community surrounding the Great Lakes National Cemetery.

3.16.1 Affected Environment

The USEPA-developed Environmental Justice Screening and Mapping Tool, EJSCREEN, was used to identify and compare minority and low-income populations. These populations in the vicinity of the site were compared to statewide data. A one-mile buffer was applied around the approximate centroid of the Phase 3 project area of the Great Lakes National Cemetery for this screening-level analysis. The community surrounding the Proposed Action area does not have a disproportionately high minority or low-income population when compared to the State of Michigan. A summary of the socioeconomic indicators for the Proposed Action surrounding community is provided in Table 3-13.

Table 3-13. Socioeconomic Indicators within One Mile of the Proposed Action

Socioeconomic Indicator	Value (%)	State Average (%)	Percent Difference (%)
Demographic Index	0.92	1.18	-0.26
Supplemental Demographic Index	1.26	1.5	-0.24
People of Color	19	26	-7
Low Income	25	31	-6
Unemployment Rate	16	6	10
Limited English-Speaking Households	0	2	-2

Socioeconomic Indicator	Value (%)	State Average (%)	Percent Difference (%)
Less Than High School Education	12	9	3
Under Age 5	4	5	-1
Over Age 64	23	18	5
Low Life Expectancy	15	20	-5

EJSCREEN was also used to determine relative pollution exposure and proximity to potential sources of environmental pollution within the one-mile buffer of the Great Lakes National Cemetery. The National Cemetery and its surrounding community do not experience a greater exposure to pollution than the average for the State of Michigan. These results are summarized in Table 3-14.

Table 3-14. Pollution and Sources within One Mile of the Proposed Action

Pollution Exposure or Source	Value	State Average	Percent Difference ^a (%)
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$) ^b	7.31	7.84	+7.0
Ozone (ppb) ^c	67.2	67.3	+0.1
Diesel Particulate Matter ($\mu\text{g}/\text{m}^3$)	0.0784	0.116	+38.7
Toxic Releases to Air	310	2500	+155.9
Traffic Proximity (daily traffic count/distance to road)	290,000	910,000	+103.3
Lead Paint (% pre-1960 housing)	0.1	0.38	+116.7
Superfund Proximity (site count/km distance)	0.073	0.28	+117.3
Risk Management Program Facility Proximity (facility count/km ^d distance)	0	0.38	+200.0
Hazardous Waste Proximity (facility count/km distance)	0.38	2	+136.1
Underground Storage Tanks (count/km ²) ^e	0.3	7.6	+184.8
Wastewater Discharge (toxicity-weighted concentration/m ^f distance)	0.021	880	+200.0
^a Percent difference is calculated as: $PD = \frac{ Value - State Average }{(Value + State Average) \div 2} \times 100$ ^b $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter ^c ppb = parts per billion ^d km = kilometer ^e km ² = square kilometer ^f m = meter Source: USEPA			

3.16.2 Environmental Consequences

3.16.2.1 Proposed Action

There are no effects or exposure pathways that are higher than average for the Proposed Action surrounding community when compared to the state average. The Proposed Action would not be expected to have disproportionately high or adverse impacts on low-income or minority populations within the affected area.

3.16.2.2 No Action Alternative

Under the No Action Alternative, the proposed expansion site surrounding the eastern side of the Great Lakes National Cemetery and Fagan Lake would remain undeveloped. There would be no impacts related to environmental justice associated with the No Action Alternative.

3.17 Cumulative Impacts

As defined by the CEQ Regulations in 40 CFR 1508.7, cumulative impacts are those which “result from the incremental impact of the proposed action when added to other past, present, and reasonably foreseeable future action, without regard to the agency (Federal or non-Federal) or individual who undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.” Cumulative impact analysis captures the effects that result from the Proposed Action in combination with the effects of other actions taken during the duration of the Proposed Action in the same geographic area. Because of extensive influences of multiple forces, cumulative effects are the most difficult to analyze.

NEPA requires the analysis of cumulative environmental effects of a Proposed Action on resources that may often be manifested only at the cumulative level to the extent reasonable and practical. Therefore, projects planned within the vicinity of the Great Lakes National Cemetery that could overlap the proposed timeframe for the Phase 3 expansion were considered in VA’s cumulative impacts analysis. A review of current and upcoming Michigan Department of Transportation and Holly Township development plans did not reveal any potential overlap in construction timelines within the vicinity of the site.

There is one upcoming project planned near the Phase 3 expansion site that proposes to develop a research and office center north of the site. This project is summarized below in addition to any potential for cumulative impacts in conjunction with the Proposed Action.

The 2024 Holly Township, Oakland County, Michigan Master Plan was developed as required by the Michigan Planning Enabling Act, Public Act 33 of 2008 to be a guide for development goals and policies in Holly Township. According to the Master Plan, The Great Lakes National Cemetery and majority of the Phase 3 expansion site is located within the North Holly Road community. Holly Township plans for the North Holly Road community to attract science, technology, engineering, and mathematics related research and professional office uses through the development of a research and office center between Evans Road and Ray Road, surrounding North Holly Road, approximately one mile from the Great Lakes National Cemetery. Zoning ordinances will need to be amended for this development. The Master Plan does not state when this development will occur and there does not appear to be any formal planning or design documents available at this time. Therefore, the construction of the proposed research and office center is unlikely to conflict with the construction timeline for the Phase 3 development and would not contribute any cumulative impacts for the resource areas analyzed.

There were no other projects identified in the surrounding area of the National Cemetery as potentially occurring at the same time as the Proposed Action. Therefore, there are no cumulative impacts identified for the Proposed Action.

3.18 Potential for Generating Substantial Controversy

After in-depth analysis and review of interested parties, VA does not anticipate the Proposed Action to generate substantial controversy from the public or Federal, State, and local government agencies.

4.0 Protection and Mitigation Measures

Resource Area	Description	Type
Aesthetics	Design new structures to be architecturally and visually consistent with the current buildings located at the National Cemetery.	BMP
	Maintain landscaped areas, buildings, roadways, and signage.	BMP
	Incorporate existing topography and natural features into site design, wherever possible.	BMP
	Conduct construction activities with a sensitivity toward maintaining the dignity and solemnity of the National Cemetery environment during interment services.	BMP
Air Quality	Use appropriate fugitive dust suppression measures.	BMP
	Use newer construction equipment with emissions controls and maintain equipment.	BMP
	Reduce idling of construction equipment and vehicles to minimize exhaust emissions.	BMP
	Perform all demolition work under licensed contractors.	Regulatory requirement
	Use standard measures to control dust to reduce Lead Bearing Substances dust emissions during renovation.	BMP
	Implement site-specific erosion and sediment control plan to minimize and avoid fugitive dust as applicable.	Regulatory requirement
Greenhouse Gas Emissions and Climate Change	Use low-GHG-emitting technologies.	BMP
	Procure construction materials with lower amounts of embodied carbon.	BMP
	Utilize local contractors and shared transportation where feasible to minimize mileage traveled by workers to and from the site.	BMP
Cultural and Historic Resources	In the event human remains or other cultural items, as defined by the Native American Graves Protection and Repatriation Act, are found during construction or	Regulatory requirement

	operation of the National Cemetery, work would be halted in the area and the appropriate authorities and Tribes would be contacted.	
	If the project's scope of work changes from that which has been submitted to and approved by the Michigan SHPO, changes must be emailed to Preservation@Michigan.gov and to Scott Slagor (Slagors2@michigan.gov) for review and comment. Further, respective Tribes would be notified for consultation.	Regulatory requirement
Geology and Soils	Implement an erosion and sediment control plan to address soil disturbance during construction that includes the implementation of erosion and sediment control devices and stabilization practices.	Regulatory requirement
Hydrology and Water Quality	Use environmentally sensitive site design, stormwater pollution prevention controls, good engineering practices, and construction BMPs.	BMP
	Implement appropriate groundwater engineering controls and dewatering practices should groundwater be encountered during construction.	BMP
	Locate machinery servicing and refueling areas away from waterways to reduce the possibility and minimize the impacts of any accidental spills or discharges.	BMP
Wildlife and Habitat	Operate all vehicles traveling within and around the project area in accordance with posted speed limits. Vehicles should avoid snakes in the road.	BMP
	Restrict all vegetation removal and disturbance (e.g., burning, mowing, trimming) to months when the Eastern Massasauga species is likely to be hibernating (i.e., October to mid-March).	BMP
	Perform limited vegetation and tree clearing only during the USFWS-designated winter clearing window for bat species (October 1 through March 31). Limiting vegetation removal to occur only between October 1 through March 31 will avoid impacts to migratory birds.	BMP
	Provide identification and awareness training regarding the potential presence of Eastern Massasauga prior to the start of construction activities and as additional machine operators and construction personnel are integrated into the project.	

	Immediately stop construction if an Eastern Massasauga is observed. Cease activities until proper agency coordination is conducted.	BMP
	Limit vegetation removal within the area to the extent possible.	BMP
Noise	Limit construction-related noise near sensitive receptors and coordinate proposed construction activities in advance with any nearby sensitive receptors.	BMP
	Shut down noise-generating equipment when it is not needed and maintain equipment per manufacturer's recommendations to minimize noise generation.	BMP
	Utilize broadband, self-adjusting backup alarms in lieu of backup-beepers consistent with applicable safety requirements and encourage construction personnel to operate equipment in the quietest manner practicable.	BMP
	Locate stational operating equipment as far away from sensitive receptors as possible.	BMP
	Select material transportation routes as far away from sensitive receptors as possible.	BMP
	Maintain equipment per manufacturer's recommendations to minimize noise generation.	BMP
Land Use	As a federal agency operating within Federal lands, VA is not subject to local zoning regulations. None required.	N/A
Floodplains and Wetlands	Development of mitigation and stormwater management plans.	Regulatory requirement
	Clearly demarcate designated work areas.	BMP
	Avoid floodplains and Waters of the United States, where practicable.	BMP
	Maintain a minimum 50-foot buffer of undisturbed land around the adjacent wetland.	BMP
	Inspect and maintain construction vehicles in good working order and maintain a spill kit.	BMP

Socioeconomics	Secure the construction area to prevent unauthorized access to the property and to reduce the potential of health and safety risks.	Protection Measure
Community Services	Coordinate any short-term road closures with the local emergency and transportation services to prevent significant disruption to their services.	BMP
Solid Waste and Hazardous Materials	Store and appropriately label petroleum products and hazardous materials in approved containers.	BMP
	Store containers on a level and impervious surface.	BMP
	Use secondary containment systems around fuel storage containers during refueling activities. Should a spill or release occur, any impacted soil would be properly handled per Federal and State laws and regulations.	Regulatory requirement
Traffic, Transportation, and Parking	Coordinate with Holly Township on any short-term road closures during construction.	BMP
	Sequence construction to the extent feasible to minimize impacts to traffic or transportation patterns.	BMP
Utilities	None required.	N/A
Environmental Justice	None required.	N/A

5.0 Public Participation

VA invites public participation in decision-making on new proposals through the NEPA process. Public participation is guided by the VA NEPA regulations (38 CFR Part 26) and with additional guidance provided in VA's NEPA Interim Guidance for Projects. Agencies, organizations, and members of the public with a potential interest in the proposed action are encouraged to participate.

5.1 Agency Coordination

VA coordinated with agencies regarding the proposed construction projects at the Great Lakes National Cemetery. In October 2024, VA distributed scoping letters to agencies, State, county, and municipal governments, including USACE, USDA, USFWS, and EGLE.

VA initiated Section 106 consultation with the Michigan SHPO in April 2024. Michigan SHPO provided concurrence on April 26, 2024, with VA's finding of No Adverse Effect as a result of the Proposed Action. However, the Great Lakes National Cemetery is a historic district eligible for the NRHP. The Michigan SHPO determined that because Phase 3 development will continue to expand and improve the National Cemetery in accordance with established NCA design guidelines and maintain the respectful memorial landscape of the existing National Cemetery, the project will not adversely affect any of the qualities of Great Lakes National Cemetery that qualify it for listing in the NRHP (Appendix B.1).

VA requested informal consultation with USFWS pursuant to Section 7 of the ESA. USFWS responded on June 14, 2024, documenting concurrence for all specified Federally threatened and endangered species and designated critical habitat that may occur in the proposed project area, including the Eastern Massasauga and Poweshiek Skipperling (Appendix B.2).

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, various Federal, State, and/or local environmental permits and approvals are required as part of the Proposed Action. This list may not be exhaustive and additional compliance requirements and/or permits may be necessary. Appendix A provides information from the Regulatory Requirements Report for the Proposed Action.

5.2 Native American Consultation

VA coordinated with Federally recognized Native American Tribes in the vicinity of the National Cemetery, including Forest County Potawatomi Community, Wisconsin; Hannahville Indian Community, Michigan; Lac du Flambeau Band of Lake Superior Chippewa Indians; Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan; Little Traverse Bay Bands of Odawa Indians, Michigan; Menominee Indian Tribe of Wisconsin; Miami Tribe of Oklahoma; Saginaw Chippewa Indian Tribe of Michigan; Sault Ste. Marie Tribe of Chippewa Indians, Michigan; and Seneca-Cayuga Nation. Section 106 consultation letters were also sent out to the Tribes; however, no responses were received.

5.3 Scoping

VA provided federal, state, and local agencies; the public; and potentially affected parties with an opportunity to participate in scoping. Scoping is a tool for identifying the issues that should be addressed during the NEPA and NHPA compliance processes. Scoping allows the agencies, public, and stakeholders to help define priorities and express stakeholder and community issues to the agency through oral and written comments.

VA published a notice of scoping on October 6 and 9, 2024 in the Tri-County Times as well as the VA Construction and Facilities Management and Holly Township Library websites. The notice described the Proposed Action and solicited public comments with a deadline of 30 days after the publishing date, or November 6, 2024 (Appendix B.3).

VA mailed letters to federal, state, and local agencies; public officials; Federally recognized Tribes; and any identified special interest groups. Similar to the notices published in the newspaper, the letters included information on the Proposed Action, comment period, and instruction on submitting comments.

VA received one scoping response for the Proposed Action from the Michigan Department of Natural Resources regarding potential impacts to local reptile and/or amphibian populations from the construction of a road through the wetland complex between Fagan Lake and Round Lake on the southern portion of the site. VA recognizes the importance of wetlands as habitat and movement corridors for reptiles and amphibians. Concrete culverts will be installed in these areas to minimize hydrologic and biological impacts.

5.4 Public Review

VA published and distributed the Draft EA for a 30-day public comment period as announced by a Notice of Availability published in the Tri-County Times on January 5 and 8, 2025 (Appendix B.4). VA mailed or emailed letters to federal, state, and local agencies; public officials; Federally recognized Tribes; and any identified special interest groups (see Section 6.0 for a complete list of agencies and persons consulted). Similar to the notices published in the newspaper, the letters included information on the Proposed Action, comment period, and instruction on submitting comments. Review copies of the Draft EA were made available online at <https://www.cfm.va.gov/environmental/index.asp> or at the Holly Township Library, located at 1116 N Saginaw St, Holly, MI 48442.

VA received a comment from the Saginaw Chippewa Indian Tribe of Michigan's Tribal Historic Preservation Office (THPO), dated December 31, 2024, which stated that there are no recorded resources within the area of potential effect. It is the Tribe's opinion that the proposed project will have no effect on cultural resources. If the scope of the project changes, VA will notify the Tribe's Historic Preservation Office immediately.

Michigan's Department of Natural Resources provided comments on the Draft EA on January 14, 2025, concurring with VA's findings in Section 3.7.2.1 that the implementation of BMPs and other measures should minimize direct or indirect impacts on State-listed species.

There were no other comments received on the Draft EA during the public comment period.

6.0 Agencies and Persons Consulted

Affiliation	Contact	Address	Email and Phone Number
Federal Agencies			
U.S. Army Corps of Engineers, Chicago District	Kevin J McDaniels, Deputy District Engineer	477 Michigan Ave Detroit, MI 48226	LREPAO@usace.army.mil 313-226-2476
U.S. Department of Agriculture Natural Resources Conservation Service Lapeer Field Office	Haley Dukes, District Conservationist	700 South Main Street Suite 120C Lapeer, MI 48446	Haley.m.smith3@usda.gov (810) 664-0895 x5
U.S. Fish and Wildlife Service Michigan Ecological Services Field Office	Scott Hicks, Field Office Supervisor	2651 Coolidge Road Suite 101 East Lansing, MI 48823	scott_hicks@fws.gov (517) 351-6274
State Agencies			
Michigan State Historic Preservation Office Cultural Resource Management and Planning	Scott Slagor Section 106/Cultural Resource Protection Manager	300 N. Washington Square Lansing, MI 48913	Slagors2@michigan.gov (517) 285-5120
Michigan Department of Natural Resources Executive Division	Scott Bowen, Director	P.O. Box 30028 Lansing, MI 48909	DNR-Director@Michigan.gov (517) 284-6367
Michigan Department of Environment, Great Lakes, and Energy Water Resources Division	Phil Argiroff Acting Director	P.O. Box 30458 Lansing, MI 48909	ArgiroffP@Michigan.gov Main Office: (517) 284-5567 (517) 290-3039
Local Agencies			
Oakland County Planning Department	Bret Rasegan, Planning Manager	2100 Pontiac Lake Road,	raseganb@oakgov.com (248) 858-5445

		Building 41 West Waterford, MI 48328	
Oakland County Water Resources Commission	Jim Nash, Water Resources Commissioner	One Public Works Drive Building 95W Waterford, MI 48328	wrc@oakgov.com (248) 858-0958
Holly Township Planning and Zoning Department	Karin Winchester, Zoning Administrator	102 Civic Drive Holly, MI 48442	clerk@hollytownship.org (248) 634-9331 x 301
Elected Officials			
U.S. Senate	Senator Elissa Slotkin	SH-825B/C Hart Senate Office Building Washington, DC 20510	Email Form 202-224-4822
U.S. Senate	Senator Gary Peters	724 Hart Senate Office Building Washington, DC 20510	Email Form (202) 224-6221
U.S. House of Representatives (MI District 9)	Representative Lisa C. McClain	444 Cannon House Office Building Washington, DC 20515	Email Form (202) 225-2106
State of Michigan	Governor Gretchen Whitmer	P.O. Box 30013 Lansing, MI 48909	Email Form (517) 335-7858
Michigan House of Representatives District 72	State Representative Mike Mueller	N-1091 House Office Building P.O. Box 30014 Lansing, MI 48909	Email Form (517) 373-0840

Michigan Senate District 22	State Senator Lana Theis	P.O. Box 30036 Lansing, MI 48909	Email Form (517) 373-2420
Tribes			
Forest County Potawatomi Community, Wisconsin	James Crawford, Chairman	5416 Everybodys Rd. Crandon, WI 54520	James.crawford@fcp-nsn.gov (715) 478-7200 (715) 478-5280 Fax
	Luke Heider, THPO	P.O. Box 340 Crandon, WI 54520	luke.heider@fcp-nsn.gov (715) 478-7354
Hannahville Indian Community, Michigan	Kenneth Meshigaud, Chairperson	N14911 Hannahville B1 Rd. Wilson, MI 49896	tyderyien@hannahville.org (906) 723-2602 (906) 466-2933 Fax
Lac du Flambeau Band of Lake Superior Chippewa Indians	Sarah Thompson, THPO	P.O. Box 67 Lac Du Flambeau, WI 54538	Sarah.thompson@ldftribe.com (715) 588-4831
Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan	Alina Shively, THPO Director	P.O. Box 249 Watersmeet, MI 49969	Alina.shively@lvd-nsn.gov (906) 358-0137
	James Williams, Chairman	East 23968 Pow Wow Trail Watersmeet, MI 49969	Jim.williams@lvd-nsn.gov (906) 358-4577 (906) 358-4785 Fax
Little Traverse Bay Bands of Odawa Indians, Michigan	Regina Gasco-Bentley, Chairperson	7500 Odawa Circle	tribalchair@ltbbodawa-nsn.gov (231) 242-1418 (231) 242-1411 Fax
	Melissa Wiatrolik, THPO	Harbor Springs, MI 49740	mwiatrolik@ltbbodawa-nsn.gov (231) 242-1408 (231) 242-1416 Fax
Menominee Indian Tribe of Wisconsin	David Grignon, THPO	P.O. Box 910	dgrignon@mitw.org (715) 799-5258

		Keshena, WI 54135	(715) 799-5295 Fax
Miami Tribe of Oklahoma	Douglas Lankford, Chief	3410 P St. Miami, OK 74354	dlankford@miamination.com (918) 541-1300 (918) 542-7260 Fax
	Logan York, THPO	P.O. Box 1326 Miami, OK 74355	thpo@miamination.com (918) 541-7885
Saginaw Chippewa Indian Tribe of Michigan	Tim Davis, Chief	7500 Soaring Eagle Blvd. Mt. Pleasant, MI 48858	tidavis@sagchip.org (989) 775-4000 (989) 775-4131 Fax
	Marcella Hadden, THPO	6650 E. Broadway Mt. Pleasant, MI 48858	mlhadden@sagchip.org (989) 775-4751 (989) 775-4770 Fax
Sault Ste. Marie Tribe of Chippewa Indians, Michigan	Austin Lowes, Chairperson	523 Ashmun St. Sault Ste. Marie, MI 49783	alowes@saulttribe.net (906) 635-6050 (906) 635-4969 Fax
	Marie Richards, Cultural Repatriation Specialist	531 Ashmun St. Sault Ste. Marie, MI 49783	mrichards@saulttribe.net (906) 635-6050 (906) 635-8644 Fax
Seneca-Cayuga Nation	Charles Diebold, Chief	23701 South 655 Rd. Grove, OK 74344	cdiebold@sctribe.com (918) 787-5452 (918) 787-5521 Fax
	William Tarrant, THPO	P.O. Box 453220 Grove, OK 74344	wtarrant@sctribe.com (918) 791-6061
Local Community			
Rose Hill Center	Mark Perry, Facilities Manager	5130 Rose Hill Blvd. Holly, MI 48442	admissions@rosehillcenter.org (248) 634-5530

7.0 List of Preparers

7.1 Department of Veterans Affairs Staff

Mr. Fernando Fernandez
Environmental Engineer
Construction & Facilities Management
U.S. Department of Veterans Affairs

7.2 LRS Federal (Consultant)

Name and Title	Years of Experience
Jesse Byrd, Project Manager	20
Sara Schulkowski, EIT, Environmental Engineer	7

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9.0 Glossary

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

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

Ambient Air Quality Standards—Those standards established according to the Clean Air Act (CAA) to protect health and welfare.

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

Attainment area—Region that meets the National Ambient Air Quality Standard (NAAQS) for a criteria pollutant under the CAA.

Best management practices (BMPs)—Methods, measures, or practices to prevent or reduce environmental impacts.

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

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

Cultural resources—The physical evidence of our Nation's heritage. Includes archaeological sites; historic buildings, structures, and districts; and localities with social significance to the human community.

Cumulative Impact—A cumulative impact, or effect, results from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.

Decibel (dB)—A unit of measurement of sound pressure level.

Direct impact—A direct impact, or effect, is caused by a proposed action and occurs at the same time and place.

Emission—A release of a pollutant.

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

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

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

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

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

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

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

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

Any substance designated pursuant to section 311 (b)(2)(A) of the Clean Water Act.

Any element, compound, mixture, solution, or substance designated pursuant to Section 102 of Comprehensive Environmental Response, Compensation and Liability (CERCLA).

Any hazardous substance as defined under the Resource Conservation and Recovery Act (RCRA).

Any toxic pollutant listed under Toxic Substances Control Act (TSCA).

Any hazardous air pollutant listed under Section 112 of the CAA.

Any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action pursuant to Subsection 7 of TSCA.

The term does not include: 1) Petroleum, including crude oil or any thereof, which is not otherwise specifically listed or designated as a hazardous substance in a above. 2) Natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas). A list of hazardous substances is found in CFR 302.4.

Indirect impact—An indirect impact, or effect, occurs later in time or farther removed in distance from the action causing it, but is still reasonably foreseeable. Indirect impacts may include induced changes in the pattern of land use, population density or growth rate, and related effects on air, water, and other natural and social systems.

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

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

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

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

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

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

Particulates or particulate matter—Fine liquid or solid particles such as dust, smoke, mist, fumes, or smog found in air.

Physiographic region—A portion of the Earth’s surface with a basically common topography and common morphology.

Remediation—An action that reduces or eliminates a threat to the environment; often used to refer to “clean up” of chemical contamination in soil or water.

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

Significant impact—According to 40 CFR 1508.27, “significance” as used in NEPA requires consideration of both context and intensity.

Context. The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.

Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action.

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

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

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

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

Waters of the United States—Include the following: territorial seas and traditional navigable waters; tributaries; lakes, ponds, and impoundments of jurisdictional waters; and adjacent wetlands.

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

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

Wildlife habitat—Set of living communities in which a wildlife population lives.

Appendix A: Environmental Permits

In addition to the regulatory framework of National Environmental Policy Act (NEPA), the Council on Environmental Quality Regulations Implementing the Procedural Provisions of NEPA, the U.S. Department of Veterans Affairs' (VA's) NEPA regulations (38 Code of Federal Regulations [CFR] Part 26), and VA's NEPA Interim Guidance for Projects, the following federal, state, and/or local environmental permits are likely required as part of the Proposed Action.

United States Army Corp of Engineers (USACE) Nationwide Permit 51

A USACE Nationwide Permit 51 must be obtained if jurisdictional Waters of the United States (WOTUS) are anticipated to be impacted during the development of the Great Lakes National Cemetery Phase 3 expansion area. Broadly, WOTUS are water features that either are navigable or connect to a navigable waterway. In the case of the Great Lakes National Cemetery Phase 3 expansion area, WOTUS anticipated to be impacted may include wetlands located in the northwestern, central and southern portions of the Great Lakes National Cemetery Phase 3 expansion area. However, whether the identified wetlands are WOTUS under federal jurisdiction must still be determined by the United States Army Corps of Engineers (USACE).

In the event that wetlands and water features anticipated to be impacted during the Great Lakes National Cemetery Phase 3 expansion area project are determined to be under federal jurisdiction, a Nationwide Permit 51 must be obtained for development activities. Potential wetland and water features anticipated to be impacted by the project are depicted in the Wetland Delineation Report dated January 12, 2024, and provided under separate cover. The USACE Nationwide Permit 51, along with Michigan's Department of Environment, Great Lakes, and Energy (EGLE) Water Resources Division (WRD) permits, can be applied for through a Joint Permit Application (JPA) submitted to the Michigan EGLE.

Michigan EGLE WRD General Permit, Minor Project, or Individual Permit

A Michigan EGLE WRD General Permit, Minor Project, or Individual Permit must be obtained if water features under Michigan jurisdiction are anticipated to be impacted by the development of the Great Lakes National Cemetery Phase 3 expansion area. The wetlands and streams identified by ECS in the northwestern, central, and southern portions of the Great Lakes National Cemetery Phase 3 expansion area may be under Michigan jurisdiction. Potential wetland and water features anticipated to be impacted by the project are depicted in the Wetland Delineation Report dated January 12, 2024, and provided under separate cover. Whether or not the wetlands and water features within the Phase 3 expansion area are under Michigan's jurisdiction is determined by the Michigan EGLE. The Michigan EGLE WRD GP, MP, or Individual Permit, along with the USACE Nationwide 51 Permit and the Michigan EGLE WRD Floodplain Permit, can be applied for through a JPA submitted to the Michigan EGLE.

Michigan EGLE WRD Floodplain Permit

A floodplain permit from the Michigan EGLE must be obtained prior to the alteration and/or occupation of a 100-year floodplain. However, if the floodplain affected is less than two square-miles, the Michigan EGLE may determine that a floodplain permit is not required. According to the Federal Emergency Management Agency Flood Insurance Rate Map 26125C0151F, portions of the Great Lakes National Cemetery Phase 3 expansion area are located within a 100-year floodplain. Whether or not a floodplain permit is required is determined by the Michigan EGLE. The Michigan EGLE WRD Floodplain Permit, along with the Michigan EGLE GP, MP, or Individual Project and USACE Nationwide Permit 51, can be applied for through a JPA submitted to the Michigan EGLE.

Michigan EGLE WRD National Pollution Discharge Elimination System (NPDES) Permit

A Michigan EGLE WRD National Pollution Discharge Elimination System (NPDES) permit is required since construction storm water is anticipated to be discharged to surface waters under Michigan's jurisdiction during the development of the Great Lakes National Cemetery Phase 3 expansion area development.

Oil And Oil-Containing Products Spill Prevention Measures

A Pollution Incident Prevent Plan (PIPP) is required if the total aggregate of capacity of oil and oil containing product containers within the Great Lakes National Cemetery Phase 3 expansion area equal or exceed 1,320 gallons at any time during the construction period. The PIPP must conform to requirements set forth in 40 CFR 112 and Part 5 of the Michigan Administrative Code of the Department of Environment, Great Lakes, and Energy. The PIPP contains information pertaining to the facility location, contact information, and construction; details pertinent information regarding the oil and oil-containing products stored on-site; identifies spill prevention measures and pathways to which spilled materials may enter the environment; designates an on-site spill prevention and control coordinator; and outlines spill and release reporting procedures for various state, federal, and private entities.

Oakland County, Michigan Soil Erosion and Sedimentation Control (SESC) Permit

A SESC permit from Oakland County, Michigan must be obtained when disturbing one or more acres of earth within 500 feet of a water's edge in Oakland County. As disturbance of more than one acre of land within 500 feet of a water's edge is anticipated as part of the development of the Great Lakes National Cemetery Phase 3 expansion area, a SESC permit from Oakland County must be obtained.

Michigan EGLE Air Quality Division (AQD) Permit to Install (PTI)/New Source Review (NSR)

Depending on the fuel source and capacity of the proposed heater to be installed at the maintenance facility at the Great Lakes National Cemetery Phase 3 expansion area maintenance facility, a Permit to Install (PTI) or New Source Review (NSR) may need to be obtained from the Michigan EGLE AQD. However, if the proposed heater to be installed at the maintenance facility meets the exemption criteria, then a PTI or NSR is not required.

Michigan EGLE AQD Renewable Operating Permit (ROP)

A Renewable Operating Permit (ROP) is required when major sources and some smaller sources of air pollution are operated. A source is considered a major source if it will emit, or has the potential to emit, 10 tons of any one hazardous air pollutant in one year; 25 tons of any combination of HAPs in one year; or 100 tons of any other regulated air contaminant in one year. Depending on the amount of emissions expected from the proposed heater to be installed as part of the Great Lakes National Cemetery Phase 3 expansion area development activities, a ROP may be required.

Appendix B: Agency Correspondence and Consultation

B.1 Michigan Historic Preservation Office Correspondence (April 26, 2024)

B.2 United States Fish and Wildlife Endangered Species Act Section 7 Correspondence (June 14, 2024)

B.3 Scoping Notice and Proof of Publication

B.4 Notice of Availability for Draft EA and Proof of Publication

B.1 Michigan Historic Preservation Office Correspondence (April 26, 2024)



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
MICHIGAN STRATEGIC FUND
STATE HISTORIC PRESERVATION OFFICE

QUENTIN L. MESSER, JR.
PRESIDENT

April 26, 2024

W EDWARD HOOKER III
DEPARTMENT OF VETERANS AFFAIRS
810 VERMONT AVENUE NW
WASHINGTON DC 20420

RE: ER24-569 Great Lakes National Cemetery Phase 3 Development, 4200 Belford Road, Holly Township,
Oakland County (VA)

Dear Mr. Hooker:

Under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed the above-cited undertaking at the location noted above. Based on the information provided for our review, the State Historic Preservation Officer (SHPO) concurs with the determination of VA that the effects of the proposed undertaking do not meet the criteria of adverse effect [36 CFR § 800.5(a)(1)]. Therefore, the project will have no adverse effect [36 CFR § 800.5(b)] on Great Lakes National Cemetery, which appears to meet the criteria for listing in the National Register of Historic Places.

This letter evidences VA's compliance with 36 CFR § 800.4 "Identification of historic properties" and 36 CFR § 800.5 "Assessment of adverse effects," and the fulfillment of VA's responsibility to notify the SHPO, as a consulting party in the Section 106 process, under 36 CFR § 800.5(c) "Consulting party review." **If the scope of work changes in any way, please notify this office immediately. In the unlikely event that human remains, or archaeological material are encountered during construction activities related to the above-cited undertaking, work must be halted, and the Michigan SHPO and other appropriate authorities must be contacted immediately.**

We remind you that federal agency officials or their delegated authorities are required to involve the public in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties per 36 CFR § 800.2(d). The National Historic Preservation Act also requires that federal agencies consult with any Indian tribe and/or Tribal Historic Preservation Officer (THPO) that attach religious and cultural significance to historic properties that may be affected by the agency's undertakings per 36 CFR § 800.2(c)(2)(ii).

Finally, the State Historic Preservation Office is not the office of record for this undertaking. You are therefore asked to maintain a copy of this letter with your environmental review record for this undertaking. Thank you for this opportunity to review and comment, and for your cooperation.

If you have any questions, please contact Cassandra Nelson, Historian, at 517-648-4050 or by email at nelsonc32@michigan.gov. **Please reference our project number in all communication with this office regarding this undertaking.** Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,

Ryan M. Schumaker
State Historic Preservation Officer

RMS:KF:CN

copy: Elizabeth Gallow, Cultural Resource Analysts
Andrew Martin, Cultural Resource Analysts



300 NORTH WASHINGTON SQUARE • LANSING, MICHIGAN 48913
michigan.gov/shpo • (517) 335-9840

B.2 United States Fish and Wildlife Endangered Species Act Section 7 Correspondence (June 14, 2024)

From: East Lansing, FW3 <EastLansing@fws.gov>

Sent: Friday, June 14, 2024 7:46 AM

To:

Subject: Re: [EXTERNAL] RE: 2024-0027166 Request for Concurrence with Species Affects Determinations

Ms. Heidkamp,

Thank you for your request for informal consultation on this project pursuant to section 7 of the Endangered Species Act, as amended (ESA) (16 U.S.C. § 1536), and the ESA's implementing regulations (50 CFR 402.13).

The Consistency letter for 'Great Lakes National Cemetery Phase 3' for specified federally threatened and endangered species and designated critical habitat that may occur in your proposed project area consistent with the Michigan Determination Key for project review and guidance for federally listed species (Michigan Dkey) provided our concurrence for all species, except the Eastern Massasauga (*Sistrurus catenatus*) and poweshiek skipperling (*Oarisma poweshiek*).

In this email, we are providing our concurrence with your determination that this project is also not likely to adversely affect the Eastern Massasauga and poweshiek skipperling. The measures listed in your email intended to avoid, minimize, or offset effects of the action on the species are required for the project to be in compliance with section 7. Based on this information, we expect any potential effects to the species to be insignificant or discountable.

When the Action agency maintains discretionary involvement or control over the project, reinitiation of consultation is required (50 CFR 402.16(a)) under certain conditions: (1) if new information reveals effects of the project that may affect listed species or critical habitat in a manner or to an extent not previously considered; (2) if the project is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in the written concurrence; or (3) if a new species is listed or critical habitat designated that may be affected by the project.

Please note that when a project requires consultation under section 7 of the Act, the Service must consult directly with the Federal action agency unless that agency formally designates a non-Federal representative (50 CFR 402.08). Non-Federal representatives may prepare analyses or conduct informal consultations; however, the ultimate responsibility for section 7 compliance under the Act remains with the Federal agency. If

the Federal agency concurs with your determination, the project as proposed has completed section 7 consultation. All documents and supporting correspondence should be provided to the Federal agency for their records.

We appreciate the opportunity to cooperate with you in conserving endangered and threatened species. If you have any questions, please contact us at EastLansing@fws.gov.

Sincerely,

Carrie Tansy

Carrie Tansy
Deputy Field Supervisor
U.S. Fish & Wildlife Service
Michigan Ecological Services Field Office
2651 Coolidge Road, Suite 101
East Lansing, MI 48823

517-580-0284 (new phone number)

517-351-8375 (this number will no longer work beginning July 1, 2024)

she/her/hers

From:

Sent: Wednesday, May 15, 2024 3:52 PM

To: East Lansing, FW3 <EastLansing@fws.gov>

Subject: [EXTERNAL] RE: 2024-0027166 Request for Concurrence with Species Affects Determinations

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Attached are site figures, master plan drawings, the IPaC Official Species List & Michigan DKey, and photographs to help with the review.

Thank you,

From:

Sent: Wednesday, May 15, 2024 2:47 PM

To: EastLansing@fws.gov

Subject: 2024-0027166 Request for Concurrence with Species Affects Determinations

Hello,

I'd like to request consultation for project code 2024-0027166. Please see the attached letter for information regarding this project.

Please let me know if you have any questions.

Thank you,

[Instagram](#) | [LinkedIn](#) | [Facebook](#) | [Twitter](#)

Confidential/proprietary message/attachments. Delete message/attachments if not intended recipient.

B.3 Scoping Notice and Proof of Publication



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

September 26, 2024

Sent via email

**SUBJECT: Scoping Notice for the Proposed Great Lakes National Cemetery Phase 3 Gravesite Development Project located in Oakland County, Michigan
[VA ID# EAXX-029-40-NCA-1725450941]**

Dear Valued Stakeholder:

The U.S. Department of Veterans Affairs (VA) is proposing to implement an approximately 30-acre expansion of the Great Lakes National Cemetery located about 50 miles northwest of downtown Detroit, in Oakland County at 4200 Belford Road, Holly, Michigan (Figures 1 and 2). The purpose of the proposed action is to provide fifteen years of additional interment capacity to serve the projected burial needs of Veterans in the Great Lakes region.

VA is preparing an environmental assessment (EA) to analyze the potential environmental impacts of the proposed action. VA is seeking input from stakeholders as part of the scoping process in the development of this document. VA is preparing the EA in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 U.S. Code [USC] § 4321- 4370), as implemented by the Council on Environmental Quality (40 Code of Federal Regulations [CFR] Parts 1500-1508), and VA's NEPA regulations (38 CFR Part 26).

Through this notice, VA is also providing the public with information about the undertaking and seeking public comment and input about the undertaking's effects on historic properties pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, (54 USC § 306108), and its implementing regulations (36 CFR Part 800 – Protection of Historic Properties). VA is using its procedures for public involvement under NEPA in lieu of public involvement requirements in Subpart B of the Section 106 regulations per 36 CFR Part 800.2(d)(3). This notice does not serve as an invitation to consult under Section 106, it is solely to seek and consider the views of the public. VA conducted its Section 106 review and consultation separately.

If you have comments on the scope of the EA, the range of alternatives, and environmental issues for in-depth analysis, please email your comments to vacoenvironment@va.gov with the subject line "Great Lakes National Cemetery Phase 3 Expansion".

VA will publish the Draft EA for a 30-day public review and comment period. VA will notify stakeholders, publish a notice of availability of the Draft EA in the *Tri-County Times Newspaper*, and invite comments on the Draft EA at that time.

Respectfully,

Glenn Elliott
Director, Project Development Services Division
Office of Construction and Facilities Management

Figure 1. Site Vicinity Map

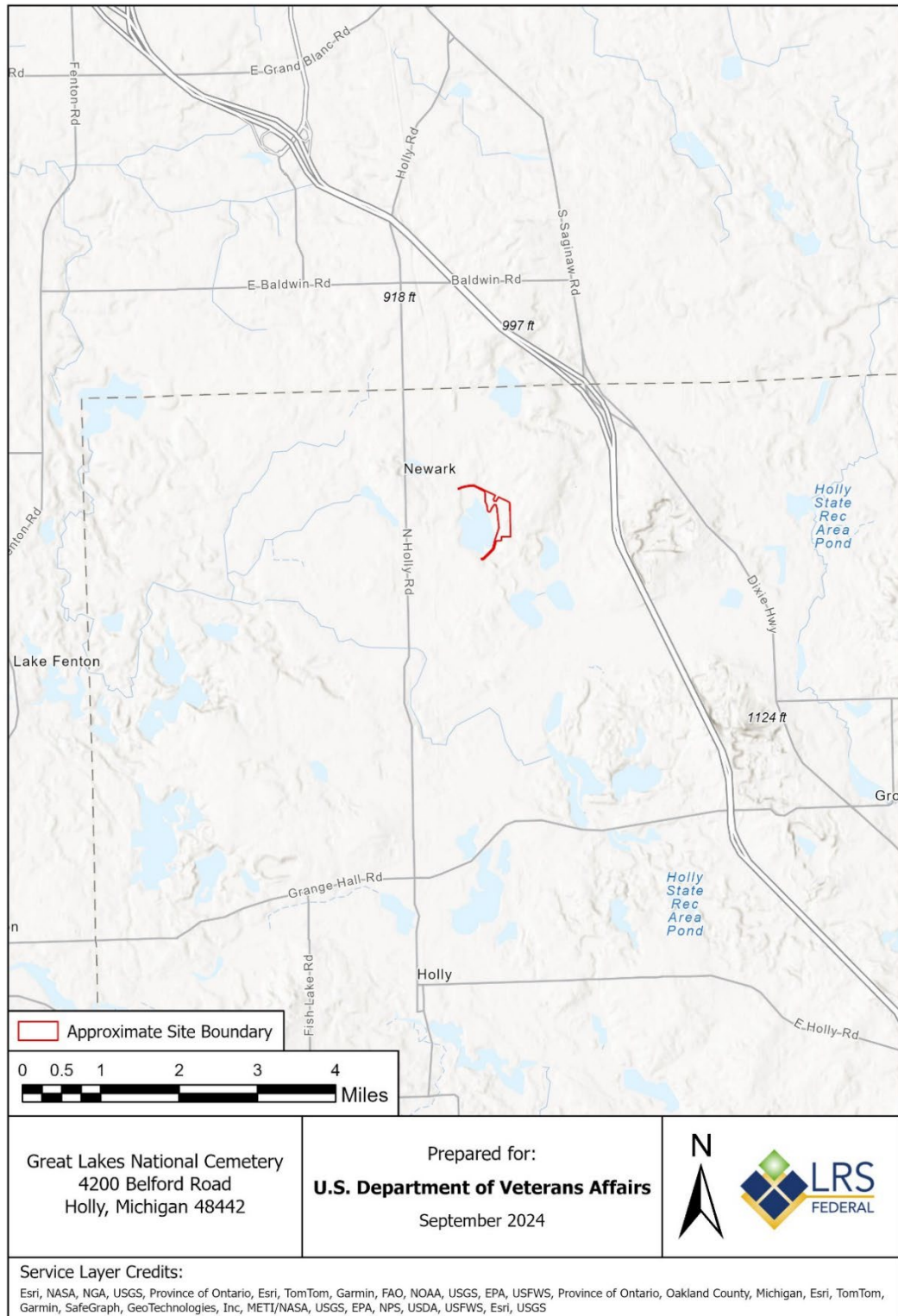


Figure 2. Site Location Map



The buck stays here!

Spend it here. Keep it here.
Invest In Your Community.



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 PHASE 3 GRAVESITE DEVELOPMENT PROJECT AT THE GREAT LAKES NATIONAL CEMETERY IN OAKLAND COUNTY, MICHIGAN [VA ID# EAXX-029-40-NCA-1725450941]

The U.S. Department of Veterans Affairs (VA) is proposing to implement an approximately 30-acre expansion of the Great Lakes National Cemetery located approximately 50 miles northwest of downtown Detroit, in Oakland County at 4200 Belford Road, Holly, Michigan. The purpose of the Proposed Action is to provide fifteen years of additional interment capacity to serve the projected burial needs of Veterans in the Great Lakes region.

VA is preparing an environmental assessment (EA) to assess the potential environmental impacts of the Proposed Action. VA is preparing the EA in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 U.S. Code [USC] § 4321- 4370), as implemented by the Council on Environmental Quality (40 Code of Federal Regulations [CFR] Parts 1500-1508), and VA's NEPA regulations (38 CFR Part 26).

VA is requesting input on the scope of issues for analysis, potential alternatives, or information/analyses relevant to the Proposed Action. The EA will evaluate the potential direct and indirect impacts to the environment resulting from the Proposed Action and alternatives, as well as cumulative impacts with other actions and projects in the project area. This scoping notice serves to inform and solicit input from the public and project stakeholders and is also available at the Holly Township Library and on the VA website at <https://www.cfm.va.gov/environmental>.

Through this notice, VA is also providing the public with information about the undertaking and seeking public comment and input about the undertaking's effects on historic properties pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, (54 USC § 306108), and its implementing regulations (36 CFR Part 800 – Protection of Historic Properties). VA is using its procedures for public involvement under NEPA in lieu of public involvement requirements in Subpart B of the Section 106 regulations per 36 CFR Part 800.2(d)(3). This notice does not serve as an invitation to consult under Section 106, it is solely to seek and consider the views of the public. VA conducted its Section 106 review and consultation separately.

If you have comments on the scope of the EA, the range of alternatives, and environmental issues for in- depth analysis, please email your comments to vacoenvironment@va.gov with the subject line "Great Lakes National Cemetery Phase 3 Expansion".

VA will publish the Draft EA for a 30-day public review and comment period. VA will notify stakeholders, publish a notice of availability of the Draft EA in the *Tri-County Times Newspaper*, and invite comments on the Draft EA at that time.

LOOKING BACK at this week in HISTORY

COMPILED BY SHARON STONE

OCT. 6

1961: President John F. Kennedy, speaking on civil defense, advises American families to build bomb shelters to protect them from atomic fallout in the event of a nuclear exchange with the Soviet Union. Kennedy also assured the public that the U.S. civil defense program would soon begin providing such protection for every American. Only one year later, true to Kennedy's fears, the world hovered on the brink of full-scale nuclear war when the Cuban Missile Crisis erupted over the USSR's placement of nuclear missiles in Cuba. During the tense 13-day crisis, some Americans prepared for nuclear war by buying up canned goods and completing last-minute work on their backyard bomb shelters.

OCT. 7

1985: Four Palestinian terrorists board the Italian cruise ship Achille Lauro shortly after it left Alexandria, Egypt, in order to hijack the luxury liner. The well-armed men, who belonged to the Popular Front for the Palestine Liberation Front (PLF), the terrorist wing of the Palestinian Liberation Organization (PLO) led by Abu Abbas, easily took control of the vessel since there was no security force on board. Abbas had been responsible for attacks on Israel and its citizens in the early 1980s. On multiple occasions, he sent men on hang gliders and in hot air balloons on bombing missions to Israel, all of which turned out to be miserable failures. In an attempt to salvage his reputation, Abbas ordered the hijacking of the Achille Lauro. Yet there were no specific goals or demands set forth in the mission.

OCT. 8

1956: Don Larsen of the New York Yankees throws the only perfect game in World Series history. "I was so happy. I felt like crying," he tells reporters after New York's 2-0 win in Game 5 over the Brooklyn Dodgers. The Yankees go on to win the World

Series in seven games. By 1956, Larsen had pitched for three teams in four seasons, the low point being his 3-21 won-loss record with the lowly Baltimore Orioles in 1954. Although he settled down in New York — he was a combined 20-7 in 1955 and 1956 — Larsen did not pitch well in Game 2 of the 1956 Series. In the second inning at Ebbets Field, the Dodgers knocked Larsen from the game in their 13-8 win. Larsen didn't know he would start Game 5 three days later until he found a fresh baseball in one of his cleats in the locker room —that was Yankees manager Casey Stengel's way of telling a pitcher that it was his day to pitch.

OCT. 9

1992: On this day, 18-year-old Michelle Knapp is watching television in her parents' living room in Peekskill, New York when she hears a thunderous crash in the driveway. Alarmed, Knapp ran outside to investigate. What she found was startling, to say the least: a sizeable hole in the rear end of her car, an orange 1980 Chevy Malibu; a matching hole in the gravel driveway underneath the car; and in the hole, the culprit: what looked like an ordinary, bowling-ball-sized rock. It was extremely heavy for its size (it weighed about 28 pounds), shaped like a football and warm to the touch; also, it smelled vaguely of rotten eggs. The next day, a curator from the American Museum of Natural History in New York City confirmed that the object was a genuine meteorite. Scientists estimate that the Earth is bombarded with about 100 pounds of meteoric material every day.

OCT. 10

1991: Former U.S. postal worker Joseph Harris shoots two former co-workers to death at the post office in Ridgewood, New Jersey. The night before, Harris had killed his former supervisor, Carol Ott, with a 3-foot samurai sword, and shot her fiancé, Cornelius Kasten, in their home. After a four-hour standoff with police at the post office, Harris was arrested. His violent outburst was one of several high-profile attacks by postal workers that resulted in the addition of the phrase "going postal" to the American lexicon. Harris, who was born in prison and had a lifetime of psychiatric problems, was

See **LOOKING BACK** on 35

B.4 Notice of Availability for Draft EA and Proof of Publication



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

December 17, 2024

Sent via email

SUBJECT: Notice of Availability of Draft Environmental Assessment for the Proposed Phase 3 Gravesite Development and Cemetery Improvements Project at the Great Lakes National Cemetery in Oakland County, Michigan [VA ID# EAXX-029-40-NCA-1725450941]

Dear Valued Stakeholder:

The U.S. Department of Veterans Affairs (VA) has prepared a Draft Environmental Assessment (EA) to analyze the potential environmental impacts associated with an approximate 30-acre expansion of the Great Lakes National Cemetery (the Proposed Action) located at 4200 Belford Road, Oakland County, Michigan (Figures 1 and 2). The Proposed Action would provide approximately 36,200 gravesites, including both casket and cremation sites, in new burial sections. In addition, the Proposed Action would include development and improvements at the National Cemetery such as access roads and parking lots, columbarium structures, cold storage building, fueling station, and an irrigation pump house.

VA prepared the Draft EA according to the National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code § 4321-4370), as implemented by the Council on Environmental Quality (40 Code of Federal Regulations [CFR] 1500-1508), and VA Implementing Regulations (38 CFR Part 26). The Draft EA examines the potential environmental effects from implementing the Proposed Action and the No Action Alternative.

The purpose and need for the Proposed Action is to provide fifteen years of additional interment capacity to serve the projected burial needs of Veterans in the Great Lakes region. The Proposed Action is needed to further the National Cemetery Administration's mission in honoring Veterans and their eligible family members with final resting places in national shrines and with lasting tributes that commemorate their service and sacrifice to our nation.

Concurrent with this mailing, a Notice of Availability will be published in the *Tri-County Times Newspaper* to inform and solicit input from the public. The Draft EA is available on the VA website at <https://www.cfm.va.gov/environmental> and a hard copy of the Draft EA is also available for public review at the Holly Township Library and at the Great Lakes National Cemetery.

VA recognizes that you, as an identified stakeholder, may have comments on the content of the Draft EA. Please submit your comments/information via email within 30 days following receipt of this NOA to vacoenvironment@va.gov with the subject line, "Great Lakes National Cemetery Draft EA."

Respectfully,

GLENN ELLIOTT Digitally signed by GLENN ELLIOTT
Date: 2024.12.17 09:20:42 -05'00'

Glenn Elliott
Director, Project Development Services Division
Office of Construction and Facilities Management

Figure 1. Site Vicinity Map

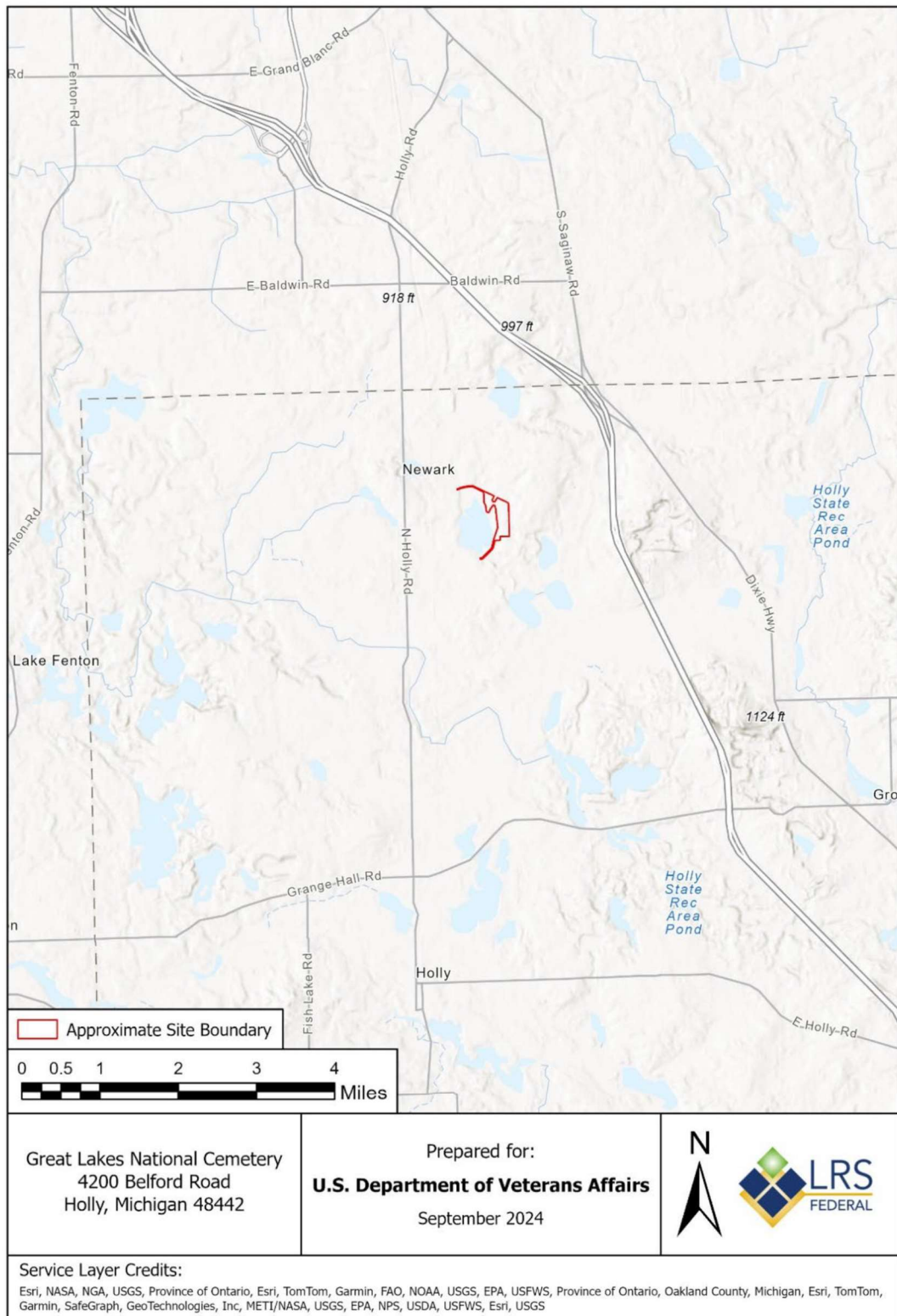


Figure 2. Project Location Aerial Map



Obituaries

Mary Katherine Allen 1956 – 2024

Mary Katherine Allen - age 68, of Fenton, passed away peacefully on Sunday, December 22, 2024. In accordance with Mary's wishes cremation has taken place. Visitation will be 10 AM - 1 PM on Saturday, January 18, 2025 at Sharp Funeral Homes, 1000 Silver Lake Road, Fenton. Funeral Service will begin immediately after the Visitation at 1 PM. For those desiring and in lieu of flowers, contributions to the American Brain Tumor Association <https://www.abta.org/> in her memory and on behalf of her sister are appreciated. Mary was born on May 18, 1956 in Flint, to Dale and Winifred (Saum) Schober, the second of four children. Her family moved to Fenton, in 1968 and she graduated from Fenton High School in 1974. She went on to earn a bachelor's degree from Ferris State University, an alma mater she remained proud of her entire life. She worked at General Motors Service Parts Operations for 32 years before retirement, where she held various roles in Finance, Supplier Management, and ACDelco Product Development, forming countless friendships along the way. Remaining a proud Fenton resident, Mary often supported local businesses and enjoyed dining out at various establishments in town. An avid traveler, she traversed Michigan extensively throughout her life, spending time especially in the Upper Peninsula and Lewiston. Through her work at General Motors, she was able to visit Japan, Korea, Brazil and Australia, and briefly lived in Shanghai, China. She also had a fondness for Las Vegas, loving cards and playing games in general. Mary prided herself as a hostess,



enjoying cooking, decorating her house, and entertaining family and friends. She was generous with her home and the door was always open for all, including the friends of her children. She possessed an active interest in culture, remaining a constant reader and theater enthusiast. She loved cinema and meticulously researched the next film on her list to watch. Later in life she gained a passion for quilting, attending classes and exercising her creativity in the form of beautiful gifts for her family and friends. Mary was a vibrant, thoughtful, and loving person. To meet her was to be immediately touched by her bright and sensitive personality. She invited conversation and fellowship with everyone she met, and never hesitated with her generosity and kindness. Prevailing throughout her life was a deep love for her family, and she was especially devoted to her children and grandchildren, supporting them however she could. Mary is survived by her husband, Gary Allen; children, Jon (Angie) Foley, Erin (Adam) Turner, and Lauren Foley; siblings, Dale (Julie) Schober and Lisa (Schober) Rieser; grandchildren, Stella Turner, Peggy Foley, Joseph (Joey) Turner, and Henry Foley; special nieces, nephews and cousins, and many former colleagues and friends including Kristin Hayes, Tammy Baumdraher, and Nolan Moiles. Mary was preceded in death by her parents, Dale Schober and Winifred (Saum) Schober and her beloved sister, Anne (Schober) Liedel. www.sharpfuneralhomes.com.



VIEW OBITUARIES ONLINE. TCTIMES.COM



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

Notice of Availability of Draft Environmental Assessment for the Proposed Phase 3 Gravesite Development and Cemetery Improvements Project at the Great Lakes National Cemetery in Oakland County, Michigan [VA ID# EAXX-029-40-NCA- 1725450941]

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The Draft EA is available on the VA website at <https://www.cfm.va.gov/environmental>. A hard copy of the Draft EA is also available for public review at the Holly Township Library.

VA recognizes that you, as an identified stakeholder, may have comments on the content of the Draft EA. Please submit your comments/information via email within 30 days following receipt of this NOA to vacoenvironment@va.gov with the subject line, "Great Lakes National Cemetery Draft EA."