
**FINDING OF NO SIGNIFICANT IMPACT
U.S. DEPARTMENT OF VETERANS AFFAIRS
LAND ACQUISITION FOR FUTURE
OHIO WESTERN RESERVE
NATIONAL CEMETERY EXPANSION
10175 RAWIGA ROAD
RITTMAN, OHIO**

Introduction

A Final Environmental Assessment (EA), included herein by reference, was prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the U.S. Department of Veterans Affairs' (VA's) Proposed Action to acquire approximately 156 acres of land located southerly adjacent to Ohio Western Reserve National Cemetery (OWRNC) for the future expansion of the cemetery. The EA was prepared in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code 4321 *et seq.*), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26).

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

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

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

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

1. Description of the Proposed Action and Alternatives

Proposed Action

The Proposed Action is to acquire approximately 156 acres of land located southerly adjacent to OWRNC, currently occupied by the Rawiga Golf Club, for the future expansion of OWRNC. VA

would acquire the Site in 2022, would lease it back to the current owners for continued operation of the golf course for at least 15 years, and would later expand the cemetery on to the Site.

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

Alternatives Considered

Although VA estimates the current OWRNC property contains adequate space for burials for more than 50 years, additional land, preferably adjacent to the existing OWRNC, will be needed to meet the interment needs of regional Veterans and their families in the future. NCA considers adjacent/contiguous property to be the first and best option for cemetery expansion.

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

The Final EA examined in-depth two alternatives, the Proposed Action and the No Action Alternative.

Proposed Action

VA would acquire approximately 156 acres of land contiguous to the south of the OWRNC, currently occupied by Rawiga Golf Club, for the future expansion of the cemetery. After acquisition, VA would lease the property back to the current owners for continued operation of the golf course for at least 15 years, and would later incorporate the Site into the cemetery. Future cemetery expansion onto the Site would be designed to be similar in appearance to the existing grounds of the OWRNC. The acquired land would be developed in approximately 25 to 30-acre phases to accommodate approximately 10 to 15 years of burial demand. The majority of the Site would eventually be developed with the expanded cemetery. However, environmentally sensitive areas and areas that are difficult to develop, such as wetlands, streams and areas with steep slopes, would be left undeveloped and would remain as scenic locations at the cemetery. It is anticipated that most, if not all, of the existing Site buildings and infrastructure would be removed for the expanded cemetery; however, VA would consider the reuse of existing improvements during the expanded cemetery design.

No Action Alternative

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

2. Environmental Analysis

Environmental Consequences

Proposed Action

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

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

No Action Alternative

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

Cumulative Impacts

The Final EA also examined the potential cumulative effects of implementing each of the considered alternatives. This analysis finds that the Proposed Action, with the implementation of the BMPs; management, minimization, and avoidance measures; and regulatory compliance measures specified in the Final EA, would not result in significant adverse cumulative impacts to the human environment.

Management, Minimization and Mitigation Measures

VA will include the BMPs; management, minimization, and avoidance measures; and regulatory compliance measures summarized in Table 4-1 of the Final EA (attached herein as Appendix A) in the Proposed Action to minimize and maintain adverse effects at less-than-significant levels.

3. Regulations

The Proposed Action will be consistent with federal, state, and local environmental regulations, including those listed in Appendix A of the Final EA.

4. Commitment to Implementation

VA affirms its commitment to implement the BMPs; management, minimization, and avoidance measures; and regulatory compliance measures identified in the Final EA and this Finding of No Significant Impact (FONSI).

5. Agency and Public Involvement

VA published and distributed the Draft EA for public comment, as announced by a Notice of Availability (NOA) published in the Medina Gazette on September 2 and 5, 2022, and in the Northern Wayne Post, from September 2 through September 8, 2022. A copy of the Draft EA was made available for public review at the Wayne County Public Library - Rittman Branch and on the VA Office of Construction and Facilities Management Environmental Program website (<https://www.cfm.va.gov/environmental/index.asp>). VA also emailed notification of the Draft EA

for review and comment, with a link to the Draft EA on VA's website, to each of the government agencies and Tribes that were contacted during the NEPA scoping and Section 106 consultation, and State and Federal congressional representatives. The Forest County Potawatomi Community, the Seneca Nation of Indians, and the Medina Soil and Water Conservation District provided comments on the Draft EA. These comments were considered in preparing the Final EA, as appropriate.

6. Finding of No Significant Impact

After careful review of the Final EA, VA has concluded that the Proposed Action would not generate significant controversy or have a significant impact on the quality of the human environment, provided VA implements the BMPs; management, minimization, and avoidance measures; and regulatory compliance measures identified in Appendix A to this FONSI. VA will implement these measures.

This analysis fulfills the requirements of the NEPA and is consistent with the VA and CEQ regulations implementing the Act. An environmental impact statement is not required.

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Mr. Joshua de Leon
Executive Director, NCA Midwest District
VA National Cemetery Administration

**Management, Minimization, and Avoidance Measures
 Incorporated into the Proposed Action**

Technical Resource Area	Measure
Aesthetics	Develop the cemetery in concert with the Site’s natural topography. Maintain some natural areas.
	Use natural buffers and/or berms between the developed portions of the cemetery and adjacent residential properties.
Air Quality	Use appropriate dust suppression methods (such as the use of water, dust palliative, covers, suspension of earth moving in high wind conditions) during onsite construction activities.
	Stabilize disturbed areas through re-vegetation or mulching if the areas would be inactive for several weeks or longer. Specific requirements would be identified with the Stormwater Pollution Prevention Plan (SWPPP).
	Implement measures to reduce diesel particulate matter emissions from construction equipment, such as reducing idling time and using newer equipment with emissions controls.
	Comply with the applicable Ohio Environmental Protection Agency (OEPA) Air Pollution Control regulations.
Cultural and Historic Resources	Should potentially historic or culturally significant items be discovered during project construction, the construction contractor would immediately cease work until VA, a qualified archaeologist, Ohio State Historic Preservation Office (SHPO), Tribes and other consulting parties are contacted to properly identify and appropriately treat discovered items in accordance with applicable state and federal laws.
Geology, Topography, and Soils	Control soil erosion and sedimentation impacts during construction by implementing erosion prevention measures and complying with the OEPA Division of Surface Water National Pollutant Discharge Elimination System (NPDES) Construction Activity - Stormwater Discharges permitting process. Implement effective controls per a site-specific SWPPP. The NPDES permit would require stormwater runoff and erosion management using BMPs, such as earth berms, vegetative buffers and filter strips, and spill prevention and management techniques. The construction contractor would implement the sedimentation and erosion control measures specified in the NPDES permit and the SWPPP to protect surface water quality.
	Complete a Farmland Conversion Impact Rating Form (Form AD-1006) in conjunction with United States Department of Agriculture – Natural Resources Conservation Service (USDA-NRCS) for the Site.

Technical Resource Area	Measure
Hydrology and Water Quality	Ensure the existing Site public water system, Class V injection well, and wastewater treatment system are operated and maintained in accordance with the OEPA permit requirements during their continued use.
	Remove/properly abandon the existing drinking water system, Class V injection well, wastewater treatment system, and unneeded water wells following the termination of the golf course lease.
	Control soil erosion and sedimentation impacts during construction by complying with the NPDES permit and the SWPPP.
	Design improvements in accordance with the requirements of Energy Independence and Security Act Section 438 with respect to stormwater runoff quantity and characteristics.
	Ensure the cemetery design includes sufficient on-site stormwater management so as not to adversely affect the water quantity/quality in receiving waters and/or offsite areas.
	Use native, low-moisture tolerant species to the extent practicable to reduce the need for irrigation.
Wildlife and Habitat	Design cemetery to maintain buffers of undisturbed land around Tommy Run, its tributary, the on-site ponds, and delineated wetlands, to the extent possible.
	Re-evaluate the potential for protected species at the Site during the future cemetery expansion design. Coordinate and consult with U.S. fish and Wildlife Service (USFWS) and Ohio Department of Natural Resources (ODNR), and conduct pre-development biological surveys, as necessary.
	Conduct tree clearing between October 1 and through March 31, outside the Indiana bat and northern-long eared bat roosting season. If tree clearing/removal activities cannot be conducted outside of bat roosting season, conduct a summer presence/absence survey to confirm protected bats are not present before tree clearing. Consult with USFWS to prior to tree clearing.
	Use native species to the extent practicable when re-vegetating land disturbed by construction to avoid the potential introduction of non-native or invasive species.

Technical Resource Area	Measure
Noise	Limit, to the extent possible, construction and associated heavy truck traffic to occur between 7:00 a.m. and 6:00 p.m. on Monday through Friday, or during normal, weekday, work hours.
	Locate stationary operating equipment as far away from sensitive receptors as possible.
	Shut down noise-generating heavy equipment when it is not needed.
	Maintain equipment per manufacturer’s recommendations to minimize noise generation.
	Encourage construction personnel to operate equipment in the quietest manner practicable (such as speed restrictions, retarder brake restrictions, and engine speed restrictions).
Land Use	None required.
Wetlands, Floodplains, and Coastal Zone Management	Complete an updated wetland survey during the future cemetery expansion design. Design cemetery improvements to avoid identified wetlands and surface waters to the extent possible.
	If cemetery design requires construction within a wetland or stream area, submit requests for jurisdictional determination to the U.S. Army Corps of Engineers (USACE) and OEPA, obtain all necessary permits and approvals from the agencies, and implement any required mitigation.
	Maintain green space buffers between the delineated wetlands/surface waters and the cemetery development areas. Ensure all buffers are staked and protected to prevent disturbance during cemetery construction.
	Design improvements in accordance with the requirements of Energy Independence Security Act Section 438 with respect to stormwater runoff quantity so as not to adversely affect the flood elevations or water quantity/quality in downstream receiving waters.
Socioeconomics	Secure construction areas to prevent unauthorized access by children from nearby residential areas.
Community Services	None required.

Technical Resource Area	Measure
Solid Waste and Hazardous Materials	Prior to termination of the golf course lease, conduct sampling in the areas of petroleum product and hazardous materials storage and handling to confirm that no releases have occurred. Remediate and/or manage any contamination that is identified, as required, to prevent unacceptable human and ecological exposures. Inform cemetery construction contractors of known/suspect residual contamination, if any, to ensure any excavated soil is properly handled.
	Complete an asbestos survey of the current Site buildings. Remove and properly dispose of asbestos containing materials that are identified in accordance with the National Emission Standards for Hazardous Air Pollutants and State of Ohio requirements prior to building demolition.
	Comply with applicable federal and state laws governing the use, generation, storage, transportation, and disposal of solid waste and hazardous materials.
Traffic, Transportation, and Parking	Coordinate with the Medina County Road Department, Wayne County Engineer and Ohio Department of Transportation, as applicable, during the cemetery design to identify and implement roadway improvements in the vicinity of the Site, if necessary.
	Ensure cemetery expansion activities do not adversely affect traffic flow on local roadways; construction would be timed to avoid peak travel hours.
	Ensure debris and/or soil is not deposited on local roadways during the construction activities.
Utilities	Decommission/remove the existing drinking water system, wastewater treatment system, and unneeded water wells in accordance with OEPA requirements following the termination of the golf course lease.
	Contact the local utility providers during the cemetery design to determine the connection/extension requirements and implement the necessary requirements.
	Design, install, and operate on-site septic systems in accordance with Medina County Health Department and OEPA requirements, to the extent practicable.
Environmental Justice	None required.