## FINAL ENVIRONMENTAL ASSESSMENT PHASE 3 EXPANSION AND IMPROVEMENTS FORT SAM HOUSTON NATIONAL CEMETERY

Prepared for:



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## **Executive Summary**

This Environmental Assessment (EA) is prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code 4321 et seq.), the President's Council on Environmental Quality Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations 1500-1508), VA's NEPA regulations (38 CFR 26), and the VA NEPA Interim Guidance for Projects (VA 2010).

In this EA, Veteran's Affairs (VA) National Cemetery Administration (NCA) identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with expanding the number of gravesites and making improvements to Fort Sam Houston National Cemetery, located within the city limits of San Antonio, Texas. This proposed cemetery expansion project would cover approximately 43 acres within the boundary of Fort Sam Houston National Cemetery and continue to provide operational service for the next 15 years. The Project will include 42,782 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, correct infrastructure deficiencies, extend the irrigation system, construct three buildings totaling 4,312 gross square feet and expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking.

The **purpose** of the Proposed Action is to continue to enable NCA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs in the region for the next 15 years.

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.

Two alternatives are analyzed in this EA.

The **Proposed Action** intends to expand and improve the Fort Sam Houston National Cemetery to provide 15 years of interment capacity.

The **No Action** alternative would not involve expansion and burial operations would continue until cemetery capacity is reached, with site maintenance activities being conducted there after.

Table 1 summarizes the resource areas analyzed in this EA and the potential environmental effects of the Proposed Action and the No Action alternative. A detailed analysis of the potential effects to these resource areas is provided in Section 3.0.

Resource Area	Proposed Action Alternative	No Action Alternative
Aesthetics	<ul> <li>Short-term, less-than-significant adverse impacts during construction resulting from earthwork, development, and associated activities.</li> <li>Long-term, beneficial aesthetic impact from the establishment of the area to the park-like National Cemetery setting and National Shrine Standards.</li> </ul>	• None
Air Quality	<ul> <li>Less-than-significant short-term impacts to air quality due to generation of dust and emissions resulting from site work and construction, equipment/vehicles, and gravesite preparation during operation.</li> </ul>	• None
Cultural Resources	<ul> <li>No impacts to archeological resources.</li> <li>Less than significant impacts to historic resources with SHPO mitigation and BMPs.</li> </ul>	• None
Geology, Topography, and soils	<ul> <li>Long-term, less-than-significant adverse impacts to geology and topography due to grading for construction of crypt fields, stormwater and irrigation basins, and roads.</li> <li>less-than-significant adverse impacts to soils due to impacts to prime farmland. Negligible adverse impact to geology, topography, and soils during operation.</li> </ul>	<ul> <li>Significant adverse effects to soil quality if unpermitted landfills are left on site.</li> </ul>
Hydrology and Water Quality	<ul> <li>Long term, beneficial impacts to irrigation because of the installation and replacement with more efficient systems.</li> </ul>	<ul> <li>Long term, adverse impacts to outdated irrigation system</li> </ul>
Wildlife and Habitat	<ul> <li>Less-than-significant, short-term adverse impact due to construction and operation.</li> </ul>	• None
Noise	<ul> <li>Minor short-term adverse impacts during construction.</li> <li>No adverse noise impacts during operation.</li> </ul>	• None
Land Use	<ul> <li>No impact to land use. Expansion is consistent with existing zoning and land use conditions.</li> </ul>	• None
Floodplains and Wetlands	<ul> <li>Potential short and long term less-than-significant impacts to floodplains within project area</li> </ul>	• None
Socioeconomics	<ul> <li>Minor short-term beneficial impact during construction.</li> </ul>	• None
Community Services	<ul><li>No effect during construction.</li><li>Long-term beneficial impact during operation.</li></ul>	<ul> <li>Long-term adverse impact.</li> </ul>
Solid Waste and Hazardous Materials	<ul> <li>Less-than-significant short-term adverse effects during construction and mitigation.</li> <li>Long term beneficial effect from clean up and removal of buried waste on site.</li> </ul>	<ul> <li>Long term adverse effect as buried waste would be left on site and not mitigated.</li> </ul>

## Table 1. Summary of Resource Area Impacts

Transportation and Parking	<ul> <li>Minor short-term adverse effects during construction due to increase in construction vehicles and equipment.</li> <li>Long-term beneficial impacts during operation.</li> </ul>	• None.
Utilities	<ul> <li>No effect during construction.</li> <li>Beneficial long-term effects during operation due to improvement and modernization of systems.</li> </ul>	• None.
Environmental Justice	• None.	<ul> <li>Long-term adverse impact.</li> </ul>
Cumulative Impacts	<ul> <li>Beneficial long term effects; ability of VA to provide internment options for veterans and meet VA standards described in section 3.16; as well as remove unpermitted landfills.</li> </ul>	<ul> <li>Significant adverse effects; VA would not meet its standards for providing internment options for veterans; unpermitted landfills would remain affecting soil quality.</li> </ul>

## **Term Descriptions**

Adverse	Effects will negatively impact the given resource area.
Beneficial	Effects will positively impact the given resource area.
Long term	Effects will continue past construction and development.
Short-term	Effects will occur on a shorter timeframe and are not everlasting.
Significant	Requires mitigation and management to minimize impacts to resource area.
Less than Significant	Mitigation and management would be advantageous; but impacts do not rise to the level of deeming further investigation.
None	There are no impacts to the given resource area.

This EA includes Best Management Practices (BMPs) that would minimize potential adverse effects to the analyzed technical resource areas. BMPs and minimization measures are described in Section 5.

Several public agencies and other interested parties were consulted throughout the EA process in accordance with NEPA. All agency correspondence is in Appendix B.

## Section 1.0 Introduction

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) honors Veterans and their families with final resting places in national shrines and with lasting tributes that commemorate their service and sacrifice to the nation. VA operates 143 national cemeteries and 33 soldiers' lots and monument sites in 40 states and Puerto Rico. More than 4 million Americans are buried in VA's national cemeteries. VA's Office of Construction and Facility Management's mission is to advance VA's mission in support of the nation's Veterans by planning, designing, constructing, acquiring major facilities, and setting design and construction standards.

The Fort Sam Houston National Cemetery (FSHNC) is in San Antonio, Bexar County, Texas (Appendix A, Figure A). The initial cemetery buildout (Phase 1) and expansion (Phase 2) have subsequently been completed.

In this EA, VA identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with the Phase 3 Gravesite Expansion and Cemetery Improvement Project (also referred to in this EA as project area, proposed cemetery expansion area, and Phase 3 expansion area).

Two alternatives are analyzed in this EA:

VA's **Proposed Action** is to expand and improve the FSHNC in the east and west portions of the existing cemetery property, to provide 15 years of burial expansion.

The **No Action** alternative would not expand and improve the FSHNC. Burial operations would continue until the current cemetery capacity is reached and site maintenance activities would be conducted thereafter.

This EA has been prepared pursuant the National Environmental Policy Act of 1969 (NEPA) (42 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 VA's NEPA regulations (38 CFR 26). This EA also has been prepared following the VA NEPA Interim Guidance for Projects (VA 2010). These requirements specify that VA must evaluate the potential environmental impacts of VA facilities, operations, and related funding decisions prior to acting. VA must apply the NEPA review process and use the information to make an informed decision prior to undertaking a proposed action. An EA provides sufficient evidence and analysis for determining whether an action would cause significant environmental impacts (requiring an EIS) or the agency can issue a finding of no significant impact (40 CFR 1508.9). A finding of no significant impact is a decision document that briefly presents the reasons why an action would not have a significant effect on the human environment (40 CFR 1508.13). As required by NEPA and the implementing regulations from CEQ and VA, the alternative of taking no action is evaluated, providing a baseline for comparison of potential impacts from the action alternative(s).

## 1.1 Background

The FSHNC is located within the city limits of San Antonio at 1520 Harry Wurzbach Road, adjacent to the Fort Sam Houston Joint Base San Antonio (Appendix A, Figure A). The FSHNC was created by the United States Army in 1921. In 1931, it was designated a National Cemetery and formally named by Congressional Order Number 6 on August 4, 1937. The proposed area of potential effects includes approximately 43 acres across which there is planned construction of new roadways, parking lots, maintenance building, and stormwater treatment area, as well as several areas dedicated to various

## styles of burial plots.

Of that, approximately 32 acres are currently unimproved, wooded areas that are generally adjacent to Salado Creek, which forms the boundary of the expansion to the east and south. The remaining approximately 18 acres are currently cleared and maintained on the periphery of the extant cemetery.

## 1.2 Purpose and Need

The purpose of the Proposed Action is to expand and improve the FSHNC in the east and west portions of the existing National Cemetery property, providing the capacity to sustain 15 additional years of interment.

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. (Veterans Benefit Act of 2010 under Title 38 Code of Federal Regulations (CFR) Section 2400, and requirements under the Veterans Millennium Health Care and Benefits Act (Public Law 106–117, Title VI, § 611, Nov. 30, 1999, 113 Statute 1580)

One of VA's established objectives defining outcomes for their burial programs is to ensure that interment needs of Veterans and eligible family members are met by providing Veterans with a dignified burial option within 75 miles of their home (NCA 2018-2022 Long Range Plan). VA established a 75-mile service area standard because NCA data show that more than 80 percent of persons interred in National Cemeteries resided within 75 miles of the cemetery at the time of death. The United States Census Bureau American Community Survey estimates that between 2013 and 2017, 151,560 veterans (7% of the current population) reside within Bexar County. The proposed cemetery expansion would provide additional capacity for Veterans and their families within the region. The proposed development represents Phase 3 of a planned and anticipated cemetery buildout. Upon completion of the Project, the Cemetery would accommodate an additional 42,782 interment spaces. Additional improvements include repairs to existing columbaria, correct infrastructure deficiencies, extend the irrigation system, construct three buildings totaling 4,312 gross square feet and expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking. Thus, the construction and operation of the proposed cemetery expansion would meet VA's stated purpose and need as discussed above.

## **1.3 Decision-Making**

As a federal agency, the VA is required to incorporate environmental considerations into their decision- making process for the actions they propose to undertake. This is done in accordance with the previously identified law, regulation, and guidance in Section 1.0.

This EA has been developed to:

- Inform decision-makers and the public of the possible environmental effects of the Proposed Action and alternatives, as well as methods to reduce these effects.
- Document the NEPA process.
- Allow for public input into the decision-making process.
- Allow for informed decision-making by the Federal government.
- Evaluate the potential effects.

This NEPA process includes identifying the actions that the government would commit to undertake to minimize environmental effects, as required under NEPA, the CEQ regulations, VA's NCA Facilities Design Guide, Title 38 CFR– §39.60 General Requirements for Site Selection and Construction of Veterans Cemeteries and VA's NEPA regulations. The intent of the document is to provide VA with appropriate information to make an informed decision on whether to implement the Proposed Action or the No Action alternative.

## Section 2.0 Proposed Action & Alternatives

This section describes the Proposed Action and its alternatives, including those that VA initially considered, but eliminated, and the reasons for eliminating them. The screening criteria and process developed and applied by VA to hone the number of reasonable alternatives are described, providing VA's rationale in retaining for analysis one action alternative, and the Proposed Action, which best meets VA's purpose of and need for the Proposed Action.

## 2.1 Proposed Action

## **2.1.1 Cemetery Elements**

Based on current planning data, the proposed FSHNC expansion would be Phase 3 of a planned and anticipated build out to continue to provide interment services to local veterans and their families. This phase of development has been designed to avoid environmentally constrained areas (e.g., wetlands, waterways), where possible, which would be left undeveloped and remain as scenic locations at the Cemetery.

The Project encompasses approximately 43 acres (Figure D). The Project would include 42,782 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, correct infrastructure deficiencies, extend the irrigation system, include the construction of an Honor Guard building (approximately 1,232 GSF) with adjacent parking, material storage building, three bay drive through equipment storage building, expanding the administration building, renovations of the maintenance building and the public information center, replace/add site furnishings, and construct necessary infrastructure (roadways, grading, drainage, irrigation, landscaping, signage, furnishings and equipment) for the newly developed portion of the cemetery. An access road connecting the northeast boundary and turns south along the east boundary. The Project will develop VA-owned lands previously managed by the U.S. Army. Based on the anticipated design, expansion would provide all facilities necessary to maintain, operate, and provide interment sites for at least 15 years. In total, the project area would include approximately 42,782 interment options for Veterans and their families.

## 2.1.1.1 Proposed Use Levels

The National Cemetery is typically used every day throughout the year and open sunrise to sunset. FSHNC provides an average of 6 committal services per day, experiences approximately 300 daily visitor vehicles and is staffed daily by 46 VA employees.

## 2.1.1.2 FAA Regulation and Dark Sky Policy

The Federal Aviation Administration (FAA) requires that any project within 20,000 feet from a federal runway must submit forms 7460-1 and 7460-2 electronically 45 days prior to the start of construction. The City of San Antonio (COSA) has ordinances requiring downward facing lighting and no lighting past 11 pm if within a five-mile perimeter from Camp Bullis/Stanley, Lakeland Air Force Base and Medina Training Annex Military Installations. As the FSHNC does not fall within 5 miles of the military bases listed, the COSA Military Lighting Overlay District Ordinance does not apply. The VA will design outdoor lighting to limit impacts to light pollution and limit lighting after 11 pm per COSA recommendation.

## 2.1.1.3 Stormwater Management

To accommodate stormwater management issues within the proposed cemetery expansion area, VA

plans to design and construct a stormwater system as part of the design. Grassed swales, filter strips, ponding areas, etc. will be utilized as post-construction BMPs to reduce peak flow, increase total suspended solids (TSS) removals, and reduce run-off volumes. The City of San Antonio (COSA) Transportation and Capital Improvements Storm Water Design Criteria Manual (January 2016) will be followed to the maximum extent practical. A storm water pollution prevention plan (SWPPP) will be prepared for the proposed project.

## 2.1.1.4 Utility Requirements

Electricity	Electric upgrades to the existing buildings and complex on site and electrical service
	to the new Honor Guard Building
Sewer	Renovated toilets and locker room will receive new plumbing fixtures; and the new
	Honor Guard Building will receive a 6" sanitary pipe leaving the building and connect
	into the adjacent sanitary sewer system.
Potable Water	New 2" water line will lead to honor guard building from adjacent 6" water service
	line.
Irrigation Water	Utilize water from effluent/non-potable water along with supplemental potable
	water for irrigation. Upgrades to provide more sustainable and energy/water
	efficient system.

## 2.1.1.5 Sustainability Considerations

Executive Order 13834: Efficient Federal Agencies affirms that agencies shall meet statutory requirements in a manner that increases efficiency, optimizes performance, eliminates unnecessary use of resources, and protects the environment. The project will incorporate current VA sustainable design standards and directives (*VA sustainability Design Manual, 2017*) into the design and construction of the expansion area.

## 2.1.2 Environmental Best Management Practices, Permits, and Approvals

Land improvement activities associated with implementation of the Proposed Action would include land clearing, excavation, soil stockpiling, grading, installing various site improvements, creating roads, creating stormwater retention basins, and extending selected utilities.

Prior to constructing any component of the Proposed Action, VA would obtain all applicable federal, state, and local permits and approvals. Required environmental permits are listed in Section 11.0. In addition, VA would implement the BMPs listed in Section 5.0 as part of the Proposed Action. These include measures that serve to proactively minimize adverse environmental effects identified through this EA process.

## 2.2 Alternatives Identification

NEPA requires federal agencies to analyze alternatives for addressing the purpose and need. A No Action alternative must also be analyzed to inform the public what actions would be taken and the effects of those actions should the Proposed Action not be implemented. Because the cemetery expansion area was acquired for the purpose of expanding the facilities, the only action alternatives to the Proposed Action would involve the same number and types of facilities as identified in the Master Plan or minor variations in the arrangement of the various facilities for each phase. The arrangements of various facilities would be similar and would result in the same impacts as the Proposed Action; therefore, variations of Phase 3 of the Master Plan were not analyzed. The Proposed Action and No Action alternatives are described below.

## 2.2.1 Initial Alternatives Design Development (Screening Criteria)

VA identified the following 10 primary screening criteria to guide the detailed conceptual design for the proposed expansion. VA developed these site-specific criteria based on the physical, operational, and location requirements of the Proposed Action, as well as cost, environmental issues, and other factors, as described below. Satisfaction of VA's screening criteria would provide locations and facilities best suited to meet the purpose of, and need for, the Proposed Action, while minimizing overall project costs and environmental effects. These criteria included:

**Components**. The components of the proposed National Cemetery expansion should meet the minimum requirements set forth in NCA guide (VA 2010) and described in Section 2.1.1.

**Capacity**. The proposed National Cemetery expansion should provide sufficient capacity for the needs of Veterans and their families within the region for at least 15 years.

**Availability**. The design of the National Cemetery expansion is available as quickly as possible. The Project should include all required basic cemetery components, as well as the expanded roadways and utility infrastructure. The expansion should be sited in the north portion of the existing National Cemetery, allowing a logical pattern for future phases of development.

Aesthetic Buffers/Land Use Compatibility. The design of the proposed National Cemetery expansion should incorporate sufficient treed buffer along portions of the cemetery boundary to provide an aesthetic visual screen.

**Stormwater Management**. The design of the proposed National Cemetery expansion should not increase flooding of adjacent lands and should serve to properly manage onsite stormwater, potentially reducing flooding in the area in compliance with EO13834.

**Maximize Use of Disturbed Areas and Existing Topography**. The design of the proposed National Cemetery expansion should incorporate existing topography to the maximum extent possible to minimize required earthwork and should focus development in previously disturbed areas to minimize the need for tree removal. Existing mature, native, and healthy trees should be incorporated into the site design to the maximum extent possible.

**Avoid Sensitive Environmental Areas**. The design of the proposed National Cemetery expansion should avoid adjacent 100-year floodplains, wetlands, and "Waters of the United States" to the maximum extent possible, including retaining sufficient buffers around these areas. The design should comply with applicable state and federal environmental permitting requirements and processes, as well as consider local permitting guidelines.

**Cost**. The design of the proposed National Cemetery expansion should result in the most cost- effective development of the Site, including minimizing required cut-and-fill and other construction costs.

**Access**. The primary access to the Site would be from Harry Wurzbach Road and Winans Road. Access roads should be sited and installed to ensure proper traffic line-of-sight and to minimize traffic.

**Utilities**. The design of the proposed National Cemetery expansion should ensure that facilities requiring utilities are sited as proximate as possible to existing utility infrastructure to reduce construction costs and impacts to environmental factors such as floodplains, soil and water quality, hydrology and stormwater,

and wildlife habitat.

## 2.2.2 Proposed Action Alternative

VA identified one reasonable alternative. The final project design best met all of VA's screening criteria for the Proposed Action. This alternative is shown in Figure D and described in Section 2.1.

## 2.2.3 No Action Alternative

Under the No Action alternative, the Proposed Action would not be implemented. The existing FSHNC would continue to service VA but would leave Veterans and their families minimal burial options until reaching full capacity. The remainder of the site likely would continue to be owned by VA but left vacant and undeveloped.

While the No Action Alternative would not satisfy the purpose of or need for the Proposed Action, this alternative was retained to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required under the CEQ Regulations (40 CFR 1502.14).

## 2.2.4 Alternatives Eliminated from Detailed Consideration

Because the National Cemetery, which includes the proposed expansion area, was acquired for phased expansion of the facilities, the only alternatives to the Proposed Action would involve the same number and types of facilities as identified in the Master Plan or there may be minor variations in the arrangement of the various facilities for each phase. The arrangements of various facilities would be similar and would result in the same impacts as the Proposed Action; therefore, variations of Phase 3 of the Master Plan were not analyzed.

## Section 3.0 Affected Environment and Environmental Consequences

This section describes the existing physical, environmental, cultural, and socioeconomic conditions at the Cemetery and its general vicinity, with emphasis on those resources potentially affected by the Proposed Action.

In this EA, effects are identified as either significant, minor (that is, common effects that would not be of the context or intensity to be considered significant under NEPA or CEQ Regulations), less-than-significant, or no effect. Where appropriate and clearly discernible, each effect is identified as either adverse or beneficial.

The potential of the Proposed Action to significantly affect the human environment is based on considerations of both *context* and *intensity*, as specified in CEQ Regulation (40 CFR 1508.27):

**Context**. The significance of an action must be analyzed in several contexts such as society (human, national), the affected region, the affected interests, and the locality. Both short- and long-term effects are relevant.

**Intensity**. This refers to the severity of impact and the following should be considered in evaluating intensity:

- If the impact is beneficial, adverse, or both (adverse effects may occur in the short term, but mitigation or replacement will benefit in the long term).
- The degree to which the proposed action affects public health or safety.
- Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.
- The degree to which the effects on the quality of the human environment are likely to be highly controversial.
- The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.
- Whether the action is related to other actions with individually insignificant but cumulatively significant impact on the environment.
- The degree to which the action may adversely affect listed or eligible for listing in the National Register of Historic Places or may cause loss to destruction of significant scientific, cultural, or historical resources.
- The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act.
- Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

## 3.1 Aesthetics

## 3.1.1 Effects of the Proposed Action Alternative

Site construction and earthwork activities would temporarily convert existing vegetation to exposed soil during construction of the crypt fields. Upon completion of earthwork, managed turf, landscaped features, and other planned improvements would be established and installed. Construction activities temporarily affecting aesthetics may include parked construction equipment, excavation/grading, mud after rain events, heavy equipment and contractor vehicles using the adjoining roads, and perimeter control/silt fences surrounding the project area.

Following construction into the operation phase, the appearance of the Phase 3 expansion area would improve dramatically and have long-term beneficial impacts to aesthetics. The area would take on the peaceful and park-like characteristics of a National Shrine. Construction equipment would be removed, construction contractor traffic would subside and temporary effects would be minimized. Exposed soil would be graded to the design standard, and the area planted with native trees, shrubs and grasses to prevent erosion and reduce water usage. Turf grass would be planted in the sections designated for casket plots, as well as the assembly areas, surrounding the memorial walls, and where the columbarium would be located. Silt fences would be removed after final stabilization of vegetation. Manicured shrubs and hedgerows would be placed around certain features (that is, memorial walls) to instill a sense of privacy and seclusion. Stormwater ponds would be located within the expansion area and vegetated by native grasses, possibly attracting birds and wildlife. Undeveloped portions of the National Cemetery would remain available for use by wildlife until such a time when the next phase of development may occur. This would limit any long-term aesthetic effects over subsequent development phases.

## **3.1.2 Effects of the No Action Alternative**

Under the No Action Alternative, expansion of the National Cemetery would not occur. No adverse or beneficial effects to aesthetics would occur and the area would remain unmodified and naturally vegetated.

## 3.1.3 Minimization/Management Measures

BMPs would be implemented for such items as maintaining and adding trees, shrubs, and native grasses to the site perimeter to obstruct views of construction and to later incorporate it into the cemetery design; create and routinely maintain landscaped areas, buildings, roadways and signage; and implement the construction-related BMPs for dust control described Section 3.2. As historical resources are located on site, utilizing historical visual aesthetics described in Section 3.3 Cultural Resources and further defined in Section 106 consultation with the Texas SHPO will be required.

## 3.2 Air Quality

National Ambient Air Quality Standards are mandated by the Clean Air Act and administered by the USEPA, with monitoring and enforcement delegated to state authorities and state-level Air Quality Control Regions (AQCRs). Established standards identify health-based concentrations for ambient air. Regulated criteria pollutants include carbon monoxide, nitrogen dioxide, ozone, sulfur dioxide, particulate matter measuring less than 2.5 and 10 micrometers in diameter, and lead. Local AQCRs that exceed the National Ambient Air Quality Standards are deemed in non- attainment of the standard.

An emitter is classified as a *major source* if actual or potential emission of a hazardous air pollutant (HAP) is greater than 10 tons per year or 25 tons per year of any combination of HAPs. Lower thresholds apply in non-attainment areas, but only for those HAP(s) in non-attainment. A Title V permit is required for major sources of HAP. Non-major sources, excluding certain industrial, manufacturing and mining sources, are not typically required to obtain permits.

The National Cemetery is under the jurisdiction of the Texas Commission on Environmental Quality and the US Environmental Protection Agency. The City of San Antonio and Bexar County are in exceedance of federally mandated ground level ozone standards. Ozone is a colorless gas formed through photochemical reactions involving sunlight, heat, and precursor compounds such as reactive organic compounds and nitrogen oxides. Sources of local precursor emissions are likely derived from vehicle emissions and industrial processes within the AQCR.

The Phase 3 expansion area consists of vegetated ground and is not a major source of HAPs. The only sources of air emissions are facility and visitor vehicles generating exhaust during construction and operation. No major new sources of air quality pollutants are planned as part of construction or operation. As such, VA does not have, and is not required to have, a Title V operating permit based on current and proposed conditions.

In accordance with EO 13045 on children's health, EPA recommends operators and workers using dieselpowered equipment pay particular attention to worksite proximity to where children may learn, play, or live and to impose diesel emission reduction measures near these locations. Possible sensitive air quality receptors adjacent to the National Cemetery include the:

- Robert G Cole Junior Senior High School (0.08 miles from project area).
- Fort Sam Houston Elementary (0.56 miles from project area).
- Fort Sam Houston Joint Base San Antonio (0.08 miles from project area).
- Fort Sam Houston Special Education Center (0.06 miles from project area).
- Fort Sam Houston Splash Pad (0.12 miles from project area).
- Ed Parker Youth Center (0.12 miles from project area).
- Brooke Army Medical Center (0.6 miles from project area).
- Residential properties to the North, Northeast, and West.

All vehicles in the Cemetery's fleet were/would be purchased through General Services Administration and vehicles must comply with air emissions standards, to include properly functioning exhaust systems. In addition, in accordance with VA Directive 0637, no unnecessary vehicle idling is permitted.

## 3.2.1 Effects of the Proposed Action Alternative

Construction activities have the potential to generate dust and equipment emissions include land clearing and grading the approximately 43-acre project area. Emissions resulting from construction activities may cause adverse health effects and nuisance concerns, such as reduced visibility on nearby roadways.

Sources of air emissions resulting from the regular operation of the completed Phase 3 area would include visitor and staff vehicles. Although a greater number of vehicles would be present onsite compared to the No Action alternative, the Proposed Action would result in less vehicle emissions in the region because Veterans and their families would not be required to travel greater distances to other National Cemeteries.

It is not anticipated that significant quantities of air pollutants would be produced due to the Proposed Action if BMPs listed in 3.2.3 Minimization/Management Measures are followed. Because of the proximity of several playgrounds, water park, and schools north of the proposed project area, particular attention will need to be paid to limiting unnecessary idling of vehicles, minimizing traffic through carpooling and utilization of public transportation, and attention to ozone days to limit negative air quality impacts.

## **3.2.2 Effects of the No Action Alternative**

Under the No Action Alternative, the National Cemetery would not be expanded, and no significant adverse air quality effects would result. The continued use of the National Cemetery as it exists would result in negligible impacts to air quality.

## 3.2.3 Minimization/Management Measures

Implementing BMPs to reduce dust and vehicle emissions during construction and operation would minimize potential adverse effects to local air quality. To minimize the potential for adverse, short-term air quality effects, VA would implement the following typical dust control BMPs, as applicable, and in accordance with state and local requirements:

- Maintain engines and exhaust systems in good working order.
- Reduce vehicle idle times in accordance with VA Directive 0637.
- Comply with Texas Commission on Environmental Quality (TCEQ) air quality regulations.
- Use appropriate dust suppression methods during demolition and construction activities. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspending earth-moving activities during high wind conditions.
- Maintain an appropriate speed to minimize dust generated by vehicles and equipment on unpaved surfaces.
- Cover haul trucks with tarps.
- Stabilize disturbed areas through re-vegetation or mulching of the area that would be inactive for several weeks or longer and upon completion of site preparation.
- Visually monitor all demolition and construction activities regularly, particularly during extended periods of dry weather, and implement dust control BMPs when appropriate.
- Communicate dust-reducing BMPs to personnel.
- Address air quality issues as they arise. Utilize emission reduction measures laid out in the 2018-2020 City of San Antonio – Ozone Action Day Plan during high ozone days and encourage construction workers to utilize carpooling, public transportation and trip reduction to the best extent possible.

VA would secure any required, individual minor air emissions permits from the TCEQ, as appropriate, and based on the final design and prior to construction and operation of the proposed expansion area.

## 3.3 Cultural Resources

The National Historic Preservation Act of 1966 acknowledges the importance of protecting the nation's heritage. Section 106 of the Act requires federal agencies to consider the effects of their actions on historic properties by identifying historic properties, assessing adverse effects, and resolving those adverse effects. Federal agencies are required to initiate consultation with local governments, to include Native American tribes, the State Historical Preservation Office (SHPO), the public, and other entities, as appropriate.

VA Directive 7545 defines cultural resources as "all aspects of the human environment that have historical, architectural, archaeological, or cultural significance, including, but not limited to, historic properties, archaeological resources and data, Native American ancestral remains and cultural items, religious places and practices, historical objects and artifacts, historical documents, and community identity."

Cultural resources are the physical evidence of our heritage. Cultural resources are: historic properties as defined in the National Historic Preservation Act (NHPA), cultural items as defined in the Native American Graves Protection and Repatriation Act (NAGPRA), archeological resources as defined in the Archaeological Resources Protection Act (ARPA), sacred sites as defined in EO 13007 to which access is provided under the American Indian Religious Freedom Act (AIRFA), and collections as defined in 36 CFR 79, Curation of Federally Owned and Administered Collections. Requirements set forth in NEPA, NHPA, ARPA, NAGPRA, AIRFA, 36 CFR 79, EO 13007, and Presidential Memorandum on Government-to-Government Relations with Native American Tribal Governments define the basis of VA's compliance responsibilities for management of cultural resources. Regulations applicable to VA's management of cultural resources include those promulgated by the Advisory Council on Historic Preservation (ACHP) and the National Park Service (NPS).

## 3.3.1 Background

The FSHNC was created by the US Army in 1921. In 1931, it was designated a National Cemetery that eventually would include 75 acres and a projected capacity of 48,000 gravesites. The FSHNC was formally named by Congressional Order Number 6 on August 4, 1937.

In 2001, the VA completed an EA for land acquisition of approximately 150 acres from the U.S. Army for cemetery buildouts. Prior to the 2001 EA, three archeological surveys were conducted in 1978, 1982 and 1988. Three archeological sites were recorded within the parcel but coordination with the Texas State Historical Preservation Office (SHPO) determined the sites were NRHP ineligible. After cultural resource review and consultation with tribes and SHPO, it was determined there would be no significant impacts to the archeological resources on the site. The EA resulted in a Finding of No Significant Impact (FONSI).

In 2009, a programmatic agreement (PA) was completed between the VA, Advisory Council on Historic Preservation (ACHP), and SHPO for development of an additional 40 acres portions of land previously acquired from the US Army on the east side of Nursery Road and for redevelopment of the existing, developed, historic section located west of Nursery Road. The PA split the work, with the expansion of the cemetery as phase one and the improvements to existing historic sections of the cemetery as phase two. The VA completed an archeological survey using a SHPO approved sampling method of the 40 acres and determined no additional research was needed. Stipulations were detailed in the 2009 PA for both phase one and phase two and can be seen on the ACHP website <a href="https://www.achp.gov/node/8807">https://www.achp.gov/node/8807</a>.

In 2014, a memorandum of agreement (MOA) was signed by the VA, SHPO and ACHP as a replacement for the 2009 PA to address five remaining phase two improvement action items. All actions were agreed upon, further stipulations were drafted, and the memorandum was signed. Documentation of the MOA can be seen on the ACHP website <u>https://www.achp.gov/node/8807</u>.

In 2017, an amendment was added to the 2014 MOA for action item 4, relocation of the administration building. The changes included demolishing the administration building and reconstruction of an honor guard building to match the size, design, color, exterior details, and materials in the new honor guard building. As of the writing of this EA, the administration building has been demolished and phase three expansion, as proposed, seeks to complete the new honor guard building as laid out in the 2014 MOA and 2017 amendment.

The VA has recently completed a current Cultural Resource Assessment dated October 2, 2019 to assess the proposed phase 3 cemetery expansion area. This review relied upon public and nonpublic sources of information to assess cultural resources across the project area. The restricted-access state database of recorded cultural resources indicates that portions of the study area have been investigated to varying levels at times in the past 42 years. Archaeological investigations undertaken in 1977 and 2017 were performed in support of the development and expansion of the cemetery. The remaining surveys (2000, 2014, and 2018) in the area were in support of road infrastructure and the development of the Salado Creek trail system. Most of the study area remains undeveloped; however, there has been continuous development of the cemetery complex to the west and in the surrounding northern parcels of the Fort Sam Houston property.

The VA has completed outreach notifying the Texas Historical Commission (THC), local tribes, and other consulting parties to comment on the project and seek recommendations to further limit impacts to the cultural resources of the site.

As requested by the THC, a cultural resource study was conducted on July 8, 2020 across the proposed phase 3 expansion area by Terracon Consulting, Inc. Overall, 63 shovel tests were excavated within the survey area to explore for buried cultural deposits. A total of five shovel tests were positive, and the rest were negative for buried cultural resources. Four of the five artifact-bearing shovel tests helped to delineate the extent of 41BX422, which was not previously defined horizontally or vertically, and the remaining positive shovel test was considered isolated. Archaeological observations of the two previously recorded resources within the APE, 41BX422 and 41BX2187, confirmed the previous interpretations and recommendations for the sites. The study recommends that neither should be considered eligible for designations of National Register of Historic Places or State Archeological Landmark. The THC on September 17, 2020 requested to continue coordination throughout the proposed project if continued forward, and that no adverse effects to historic resources would occur if conditions listed in 3.3.4 are met.

## **3.3.2 Effects of the Proposed Action Alternative**

Given the findings of the previous investigations, extent of previous surveys, and previous responses from the THC, most of the project area may not require further, field-based archaeological investigations. However, field-based archaeological investigations may be necessary for the undeveloped sections (i.e., wooded areas) of the project area for compliance with Section 106 of the NHPA through regulatory review.

The proposed repairs to the rostrum will have effects to historic resources, the repairs will be based on previous repairs and attempt to mitigate any adverse effects through the stipulations laid out in previous PA and MOAs. The rostrum repairs and designs will be given to the Texas SHPO for concurrence and all stipulations for the new honor guard building from phase two MOA will be followed. SHPO response from May 7, 2020 (Appendix D) gives concurrence on the finding of no impacts to archeological resources, and have stipulations and design protocols for the overall design of the new Honor Guard Building to match the designs of the old building and restore historic value.

## 3.3.3 Effects of the No Action Alternative

Selection of the No Action alternative would result in the further degradation to the rostrum south of San

Antonio Boulevard, as well; the honor guard building would not be constructed as a replacement of the historic administration building, which would limit space for the housing of the honor guard and go against the agree Memorandum of Agreement laid out with the Texas SHPO. As space depletes and infrastructure continues to age within the cemetery, services will not meet the standards veterans are promised by the VA and veteran's families will need to travel further away outside the 75-mile service area standard.

## 3.3.4 Minimization/Management Measures

Project construction activities would adhere to all federal cultural preservation regulations as well as stipulations in the 2009 PA, 2014 MOA, and 2017 amendments. In the event human remains or other cultural items are found during construction or operation of the national cemetery, as defined by the Native American Graves Protection and Repatriation Act (NAGPRA), work would be halted in the area and the appropriate authorities would be contacted. The design of the Honor Guard Building will follow the mitigation and design standards laid out in SHPO consultation and prior PAs and MOAs.

## 3.4 Geology, Topography, and Soils

## Geology and Topography

The project area is located within the Blackland Prairie which consists of, topographically, flat to rolling plains. Before human intervention, the Blackland Prairie was at one-point diverse grassland with wooded stream bottoms, but has mostly been converted to agricultural and urban sprawl. The project area contains wooded areas that are generally adjacent to Salado Creek, which forms the boundary of the expansion to the east and south. See Appendix A, Figure E and F for geological site map and Topography map.

<u>Soils</u>

The project area is mapped by the United States Department of Agriculture Natural Resource Conservation and Service (USDA NRCS) Web Soil Survey as (Appendix A, Figure G):

- and - mapped con conto			
Soil Map Unit	Percent Slopes	Acres in Project Area	% of Project Area
Sunev Clay Loam	0 to 1	140.6	60.2
Lewisville Silty Clay	1 to 3	56	24
Houston Black Gravelly Clay	3 to 5	28.2	12.1
Lewisville Silty Clay	0 to 1	4.9	2.1
Loire Clay Loam, Occasionally flooded	0 to 2	1.7	0.7
Houston Black Clay	3 to 5	1.2	0.5
Sunev Clay Loam	1 to 3	0.9	0.4

## Table 2. Mapped Soil Units

## **3.4.1** Effects of the Proposed Action Alternative

The Proposed Action Alternative represents phase three of the anticipated cemetery expansion. Construction activities within the project area involves grading to suit the needs of cemetery development. Effects of these actions are limited, with changes to site topography to gradually slope toward roadways and redirecting site stormwater drainage patterns. This approach would significantly limit effects on soils and topography and extend total effects over approximately 100 years.

## Geology and Topography

Changes to topography and drainage would be required during construction to accommodate facilities, roads, and burial areas. The long-term topographic changes would result in less-than- significant adverse impacts because the Proposed Action is designed to preserve the natural surface topography and current drainage patterns to the greatest extent practical. During construction, short-term soil erosion and sedimentation effects could possibly occur as the proposed facilities are constructed. Grading would strip current vegetation, disrupt the surface and soil profiles and compact the soil. The soil would be temporarily susceptible to wind and water erosion. However, BMPs listed in Section 3.4.3 would be implemented during land-disturbing activities to avoid or minimize impacts.

## <u>Soil</u>

Any potential soil erosion due to increased impervious surfaces would be minimized by the construction of an appropriately designed stormwater management systems. Landscaping and appropriate native grasses would be planted for erosion control. Trees and shrubs would also be planted to further stabilize any disturbed soils.

Operation of the National Cemetery involves impacts to soil during preparation of interment sites for burial. Any excess soil generated is transported by cemetery personnel using landscaping vehicles to a new soil spoils area.

Prime and unique farmlands are regulated under the Farmland Protection Policy Act (FPPA) under subtitle I of Title XV, section 1539-1549. These protections are intended to limit unnecessary and irreversible conversion of prime farmlands to nonagricultural lands. Prime farmlands are assigned by the U.S. Department of Agriculture and are defined as: "land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and is also available for these uses. It has the soil quality, growing season, and moisture supply needed to produce economically sustained high yields of crops when treated and managed according to acceptable farming methods, including water management". The FSHNC is located in a prime farmland designated area, however, the area is not farmed and is not anticipated to be farmed in the future. Historic use of the land by military range activities and unpermitted landfills have greatly impacted soil quality and lands do not qualify as prime farmland.

Soil Map Unit	% of Project Area	Farmland Rating
Sunev Clay Loam	60.2	Statewide Importance
Lewisville Silty Clay	24	Prime
Houston Black Gravelly Clay	12.1	Prime
Lewisville Silty Clay	2.1	Prime
Loire Clay Loam, Occasionally Flooded	0.7	Not Prime
Houston Black Clay	0.5	Prime
Sunev Clay Loam	0.4	Statewide Importance

## Table 3. FSHNC Prime Farmland

## **3.4.2** Effects of the No Action Alternative

Under the No Action alternative, known unpermitted landfills would not be removed. Buried waste would continue to effect soil quality on the site. Soil contamination and designation is described in section 3.12. There would be no effects to geology or topography at the project area since the FSHNC would not be expanded.

## 3.4.3 Minimization/Management Measures

The implementation of the following management measures and BMPs as part of construction and operation would reduce the potential effects to geology, topography, and soil to negligible, less-thansignificant levels by controlling and limiting soil erosion and sedimentation impacts to soils and water quality.

The construction contractor would develop a stormwater pollution prevention plan and obtain NPDES Construction General Permit coverage from TCEQ for the Proposed Action. The NPDES permit would require stormwater runoff and erosion management using BMPs including earth berms, stormwater detention basins, vegetative buffers, filter strips, etc. The construction contractor would implement the NPDES permit to protect surface water quality as well as the following:

- Design paved areas to drain to the stormwater management system.
- Install and maintain BMPs, such as silt fences and water breaks, stormwater detention basins, filter fences, sediment berms, interceptor ditches, straw bales, riprap, or other sediment control structures.
- Re-spread stockpiled topsoil.
- Seed/re-vegetate areas temporarily cleared of vegetation.
- Retain onsite vegetation to the maximum extent possible.
- Plant and maintain soil-stabilizing vegetation on disturbed areas.
- Use native vegetation to re-vegetate disturbed soils.
- Utilize construction mats and temporary parking area BMPs to limit soil compaction.

## 3.5 Hydrology and Water Quality

Grassed swales, filter strips, ponding areas, etc. will be utilized as post-construction BMPs to reduce peak flow, increase Total Suspended Solids (TSS) removals, and reduce run-off volumes. The COSA Transportation and Capital Improvements Storm Water Design Criteria Manual (January 2016) will be followed to the maximum extent practical.

- TSS: There is no stated numerical requirement for total suspended solid (TSS) reduction. As a best management practice with current design plans a TSS reduction of at least 80% is anticipated.
- Rate Control: To the maximum extent practicable, maintain post-construction peak run-off rates at or below the pre-construction rates for all storms up to the 100yr, 24-hour stormwater design rate.
- Infiltration: No infiltration requirements identified.

## 3.5.1 Effects of the Proposed Action Alternative

The proposed project will conduct cemetery expansion within the FEMA floodplain for Salado Creek and therefore will need to use proper BMPs and mitigation measures to limit erosion and construction run off into the waterway and wetlands. A SWPPP will be developed to minimize storm water impacts on the site.

## **3.5.2** Effects of the 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 Cemetery.

## 3.5.3 Minimization/Management Measures

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, lessthan-significant levels. These measures are fully developed as part of this EA, concurrent with the site design efforts.

In being good environmental stewards, the VA has considered the following State and local policies and has incorporated them in the final design as follows:

- Project would implement all pertinent Federal, state, and local regulatory requirements and use environmentally sensitive site design, stormwater pollution prevention controls, good engineering practices, and construction best management practices.
- Implement appropriate groundwater engineering controls should groundwater be encountered during construction.
- Implement stormwater management facilities designed to retain excess stormwater runoff.
- A SWPPP will be incorporated in the plan set.

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 Wildlife and Habitat**

Federally recognized threatened and endangered species and their habitats are protected under Section 7 of the Endangered Species Act. Federal agencies are required to consult with the United States Fish and Wildlife Service (USFWS) to evaluate if qualifying Federal actions would adversely affect listed species or their habitat. The VA has engaged in informal consultation with the United States Fish and Wildlife Service (USFWS) and the Texas Parks and Wildlife Department (TPWD) to identify any potential for the presence of federal- or state-listed threatened or endangered species on or near the site. Through the USFWS Information for Planning and Conservation (IPaC), the ranges of the following federally listed threatened or endangered species were identified that potentially overlap the project area:

## Birds

- Golden-cheeked Warbler Dendroica chrysoparia
- Least Tern Sterna antillarum
- **Piping Plover** Charadrius melodus
- Red Knot Calidris canutus rufa
- Whooping Crane Grus americana

## Amphibians

- San Marcos Salamander Eurycea nana
- Texas Blind Salamander Typhlomolge rathbuni

Fishes

Fountain Darter Etheostoma fonticola

Clams

- Texas Fatmucket Lampsilis bracteate
- Texas Pimpleback Quadrula petrina
- Insects
- Beetle Rhadine exilis
- **Beetle** Rhadine infernalis
- Comal Springs Dryopid Beetle Stygoparnus comalensis
- Comal Springs Riffle Beetle Heterelmis comalensis
- Helotes Mold Beetle Batrisodes venyivi

## Arachnids

- Braken Bat Cave Meshweaver Cicurina venii
- Cokendolpher Cave Harvestman Texella cokendolpheri
- Government Canyon Bat Cave Meshweaver Cicurina vespera
- Government Canyon Bat Cave Spider Neoleptoneta microps
- Madla Cave Meshweaver Cicurina madla
- Robber Baron Cave Meshweaver Cicurina baronia

## Crustaceans

Peck's Cave Amphipod Stygobromus pecki

## Flowering Plants

- Bracted Twistflower Streptanthus bracteatus
- Texas Wild-rice Zizania texana

Evaluation of threatened and endangered species and critical habitat for such species was completed for the project area. The property is previously developed cemetery lands with portions historically disturbed via US army use. Based on habitat requirements and the location of the project area outside of Karst topography zones, it is unlikely any of the species listed above will be present on the site. The USFWS has concurred that it is not likely the proposed project will impact threatened and endangered species (Appendix B).

## Heritage Tree Preservation

Under the COSA Unified Development Code Section 35-509, prior to any development of property, a tree permit must be obtained. Development activities that remove trees and disturb vegetation require a Tree Preservation Plan be submitted with the Tree Permit application. In an effort to improve the appearance and value of properties and to promote character within the City, the ordinance also provides requirements for Zoning Buffers, Landscaping, Streetscape Planting Standards and Fences.

## **3.6.1 Effects of the Proposed Action Alternative**

The Proposed Action would result in the removal of selected trees. BMPs would be employed to limit impacts to wildlife such as; the Proposed Action would incorporate pollination friendly native species in landscaping selections; operation of the National Cemetery would include routine landscape maintenance that is anticipated to have no effect to wildlife habitat.

The VA has consulted with COSA and the city has agreed the proposed action does not exceed/violate any requirements for tree removal. Prior to construction, the VA will apply for a tree preservation permit through the COSA.

## 3.6.2 Effects of the No Action Alternative

Under the No Action alternative, no construction by VA would occur, resulting in no effects to vegetation or wildlife habitat in the proposed project area.

## 3.6.3 Minimization/Management Measures

VA would implement the following BMPs to reduce effects to biological resources during construction and operation.

Construction would be timed to avoid nesting periods of migratory birds on the site and protected under the Migratory Bird Treaty Act. This Act prohibits the taking of migratory birds, their nests, and eggs. Native species would be used to the greatest extent practicable when re-vegetating land disturbed by construction to avoid the potential introduction of non-native or invasive species. Pollinator-friendly native species would be used to the greatest extent practicable in landscaping selections. Should construction clearing and grading be unavoidable during the migratory bird nesting season (April to mid-July), a qualified biologist would verify the absence of biological resources. Implementation of these BMPs would ensure biological resources effects are maintained at short-term, less-than-significant levels. The VA will apply for a COSA Tree Preservation Permit prior to construction activities.

## 3.7 Noise

Area noise is primarily generated by nearby ground based vehicular traffic from Harry Wurzbach Road and Rittiman Road and to a lesser extent Interstate 410/35. Sensitive receptors near the project area are:

- Robert G Cole Junior Senior High School (0.08 miles from project area).
- Fort Sam Houston Elementary (0.56 miles from project area).
- Fort Sam Houston Joint Base San Antonio (0.08 miles from project area).
- Brooke Army Medical Center (0.6 miles from Project area).
- Residential properties to the North, Northeast, and West.

## 3.7.1 Effects of the Proposed Action

During construction of the Proposed Action, noise would occur from construction vehicles entering and exiting the site associated with land preparation and grading, and from construction of facilities, milling of roads, and construction of other infrastructure.

The most prevalent noise source at typical construction sites comes from internal combustion engines. General construction equipment using engines includes: heavy, medium, and light equipment such as excavators; roller compactors; front-end loaders; bulldozers; graders; backhoes; dump trucks; water trucks; concrete trucks; pump trucks; utility trucks; cranes; sheet pile drivers; man lifts; forklifts; and lube, oil, and fuel trucks.

Peak noise levels vary at a given location based on line of sight, topography, vegetation, and atmospheric conditions. In addition, peak noise levels would be variable and intermittent because each piece of equipment would only be operated when needed. However, peak construction noise levels would be considerably higher than existing noise levels. Relatively high peak noise levels in the range of 93 to 108 dBA (decibels, A-weighted scale) would occur on the active construction site, decreasing with distance from the construction areas. At 0.25 miles, construction noise levels would generally be low enough to be considered insignificant, although transient noise levels may be noticeable at times. Table 2 presents peak noise levels that could be expected from a range of construction equipment during proposed construction activities.

Source	Peak Noise Level (dBA, attenuated)									
	Distance from Source (feet)									
	0	50	100	200	400	1,000	1,700	2,500		
Heavy Truck	95	84-89	78-93	72-77	66-71	58-63	54-59	50-55		
Dump Truck	108	88	82	76	70	62	58	54		
Concrete Mixer	108	85	79	73	67	59	55	51		
Jack-Hammer	108	88	82	76	70	62	58	54		
Scraper	93	80-89	74-82	68-77	60-71	54-63	50-59	46-55		
Bulldozer	107	87-102	81-96	75-90	69-84	61-76	57-72	53-68		
Generator	96	76	70	64	58	50	46	42		
Crane	104	75-88	69-82	63-76	55-70	49-62	45-48	41-54		
Loader	104	73-86	67-80	61-74	55-68	47-60	43-56	39-52		

## Table 4. Peak Noise Levels Expected from Typical Construction Equipment

Grader		108	8	8-91	82-85	76-79	70-73	62-65	58-61	54-57
Pile Driver		105	9	5	89	83	77	69	65	61
Forklift		100	9	5	89	83	77	69	65	61
Worst-Case C	Combin	ed Peak N	loise L	evel (B	ulldozer,	Jackhamm	ner, Scrap	per)1		
	Distance from Source (feet)									
Source	Source Peak Noise Level (dBA, attenuated) <sup>1</sup>									
		Distance	Vistance from Source (feet)							
		0	5	0	100	200	400	1,000	1,700	2,500
Combined	Peak	50		100		200	1/	á Mile	1/2	Mile
Noise Level		103		97		91	7	4	68	3

#### Source: Tipler 1976

The National Institute of Occupational Safety and Health (NIOSH) specifies recommended exposure limits (RELs) to protect individuals against the health effects of exposure to hazardous conditions in the workplace. Allowable daily noise dose is expressed as a percentage and can be assessed using a 3-dB time-intensity tradeoff. This is summarized as for every 3-dB increase in noise level, the allowable exposure time is reduced in half. Conversely, for every 3-dB decrease in noise level, the allowable exposure time doubles (see Table 4).

Time to Reach 100% Noise Dose (hours)	Exposure level per NIOSH REL (dB, attenuated)
8 hours	85
4 hours	88
2 hours	91
60 minutes	94
30 minutes	97
15 minutes	100

Table 5.	Average RE	L to Mee	t Maximum	Allowable	Daily	Dose o	f 100%

Source: https://blogs.cdc.gov/niosh-science-blog/2016/02/08/noise/

Project construction activities are anticipated to have minor, short-term adverse noise impacts. Potential sources of noise would primarily be equipment noise during earthwork and construction. Although noise levels would be quite loud in the immediate area, the intermittent nature of peak construction noise levels would not create the steady noise level conditions for an extended duration that exposes an individual to 100% of the noise REL, leading to hearing damage. In any case, construction workers would follow standard Federal Occupational Safety and Health Administration requirements to prevent hearing damage.

In addition, daily cemetery operations would cause noise effects from increased local traffic, traffic during ceremonies, and ongoing landscaping and grounds maintenance during normal business hours. However, due to existing natural and constructed topographic barriers, the additional noise generated from these operational activities would not noticeably increase noise levels at receptors beyond the Cemetery property line. An additional 15 years of services with the same noise sources as current sources would occur. Therefore, no increased or different adverse noise impacts are anticipated resulting from the operation of the proposed cemetery expansion.

Based on a typical National Cemetery design, minor, short-term adverse noise effects to the surrounding community would be generated during operation. A significant source of noise from the five-gun salute produced from committal service shelters. However, no new committal shelters are proposed as part of

the design. Construction of new interments, public restroom, and other facilities are planned.

## **3.7.2** Effects of the 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 activities of VA.

## 3.7.3 Minimization/Management Measures

Implementing BMPs to reduce noise generated during construction would further minimize the potential effects to health and safety. No project-specific minimization measures may be required; however, the construction contractor would implement the following typical noise control BMPs, as applicable, to minimize the potential for adverse, short-term noise effects. These measures would be briefed to the contractor at the construction kick-off meeting, and daily at tailgate safety meetings. The onsite construction manager would be responsible for addressing any noise issues that may arise.

- Abide by VA project requirements that limits hours of the day in which construction equipment can be used.
- Coordinate proposed construction activities in advance with adjacent sensitive receptors. Let the residents know what operations would be occurring at what times, including when they would start and when they would finish each day. Post signage, updated daily, at the entry points of the site providing current construction information, including schedule and activity.
- Limit, to the extent possible, construction and associated heavy truck traffic to occur between 6:00 a.m. to 10 p.m. Sunday through Thursday and 6:00 a.m. to 11:00 p.m. Friday and Saturday according to COSA Code of Ordinances Article III-Noise. This measure would reduce noise effects during sensitive night-time hours.
- Ensure construction personnel abide by Occupational Health and Safety Administration noise protection requirements.
- Select material transportation routes as far away from sensitive receptors as possible.
- Shut down noise-generating heavy equipment when it is not needed.
- Maintain noisy equipment per manufacturer's recommendations.
- Encourage construction personnel to operate equipment in the quietest manner practicable (such as, speed restrictions, retarder brake restrictions, and engine speedrestrictions).

Implementation of these BMPs would reduce the potential for short-term adverse noise effects to acceptable levels, notably for nearby sensitive receptors.

## 3.8 Land Use

The project area is existing cemetery surrounded by unmaintained vegetation, military Joint Base Sam Houston and commercial and residential sites. City owned John James Park is located along Salado Creek on the north-east side of the property. The existing use of land surrounding the project area is unmaintained vegetation. Appendix A, Figure H shows Bexar County Zoning for the project extent and surrounding area.

## 3.1.1 Proposed Action

Construction of the Proposed Action would have no impact on land use. According to the City of San Antonio, the entire site is zoned as federal lands. Although VA makes all reasonable attempt to integrate its activities with local zoning, VA, as a federal agency operating within federal lands, is not subject to local zoning regulations.

Areas north of the cemetery are zoned large-scale planned industrial and much of the surrounding area

remains in industrial use. No adverse impact to land use is anticipated.

## 3.1.2 Effects of the 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 federal lands.

## 3.1.3 Minimization/Management Measures

No project-specific minimization or management measures are required.

## 3.9 Floodplains and Wetlands

## **Floodplains**

Executive Order 11988 and the floodplain management criteria contained in 44 CFR 60, Criteria for Land Management and Use, requires that long-term and short-term adverse effects associated with occupancy and modification of floodplains be avoided to the greatest extent possible. Floodplains are those areas that have been delineated by the Federal Emergency Management Agency (FEMA) and identified on the Flood Insurance Rate Maps as occurring in the 100-year floodplain. Appendix A, Figure I show the FEMA floodplain and waterways map. Appendix A, Figure I show the FEMA and waterways map.

## Conditional Letter of Map Revision (CLOMR)

The master plan supplied by the NCA for Phase 3 development displayed cemetery expansion components within the 100-year flood plain. To develop this project, the 100-year floodplain will require modification outside of all proposed burial sections, roadways and infrastructure. A CLOMR was submitted and approved by COSA and submitted to FEMA. The process will run concurrently with the EA development and be finalized prior to construction if the proposed action is chosen.

## Wetlands

Jurisdictional Waters of the United States, including streams and wetlands, are defined by 33 CFR 328.3 and are protected by Section 404 of the Clean Water Act (CLA 33 USC 1344), which is administered and enforced by USACE. Wetlands are also protected by EO 11990.

The RCK Environmental Services/ Desert Concepts Energy & Environmental / NV5 Team performed stream and wetland delineations within the designated survey areas at FSHNC (See Figure L in Appendix A). Initial background and database research were performed, followed by field surveys on September 10-11 and October 1, 2019 to evaluate the project area for federal and state water resources.

The upland portions of the project consist of a mixture of developed land (FSHNC), upland mixed hardwood forest, and shrub scrub land. The wetlands within the survey area are located within the designated FEMA floodplain of Salado Creek. Floodplains extend well beyond the boundaries of wetlands and evidence of substantial flooding was observed.

A second wetlands and waters of the US delineation and report was completed by Desert Concepts Energy & Environmental, Inc and AmaTerra Environmental, Inc. on behalf of RCK Environmental Services on May 22, 2020 for a section of land north and east for the project area designated for a VA access road (*Wetlands and Waters of the U.S. Delineation and Report for Department of Veterans Affairs Ft. Sam Houston National Cemetery Phase III Expansion and Improvements Project, San Antonio, Texas*). The report found two ephemeral drainage features that are likely non-jurisdictional under section 404 of the Clean Water Act due to the lack of ordinary high-water marks and the lack of connectivity with a traditional navigable waterway. The drainage features are also likely to be non-jurisdictional under The Navigable Waters

Protection Rule, which became in effect June 22, 2020. Appendix A, Figures K and L shows the National Wetland Inventory map and delineated wetlands for the project extent.

## 3.9.1 Effects of the Proposed Action

No impacts to delineated wetlands are proposed. Work in the vicinity of wetlands will need to follow best management practices to ensure no indirect impacts from erosion. A Conditional Letter of Map Revision (CLOMR) study was conducted by the VA, and the proposed grading associated with the FSHNC Phase three improvements will not have an adverse impact to the 1% Annual Chance (AC) water surface elevations. Site specific LiDAR and 2017 Bexar County LiDAR were used to create a corrected effective floodplain for Salado Creek and Unnamed Tributary to Salado Creek. A proposed conditions hydraulic model was created to reflect the proposed grading associated with the cemetery expansion and improvements. Results show the proposed fill will be out of the 1% AC floodplain and will not result in an adverse increase to the 1% AC water surface elevations. The effective flows for Salado Creek will be maintained.

#### **3.9.2** Effects of the No Action Alternative

Under the No Action alternative, no expansion of the National Cemetery would occur, resulting in no effects to wetlands or floodplains.

#### 3.9.3 Minimization/Management Measures

Construction activities would comply with applicable permit(s) from the USACE and State agencies listed in Section 11. Additionally, construction activities would comply, to the extent possible, with local agencies' requirements, to minimize adverse effects to wetlands/Waters of the U.S. General construction practice BMPs would also be implemented to prevent any potential hydraulic oil spills.

- Inspect and maintain construction vehicles in good working order and maintain a spill kit. Implement stormwater BMPs.
- Based on the burial layout, the flood plain modification does not require any additional cutting as the water surface elevation remains unaffected.

Implementation of these minimization measures and BMPs would ensure potential effects are maintained at less-than-significant levels.

## **3.10 Socioeconomics**

Population Totals 2010-2018						
Year	Bexar County	City of San Antonio				
2010	1,714,773	1,327,407				
2018	1,986,049	1,532,233				

#### Table 7.

Tabla G

Veteran Population Totals	
Bexar County	151,560
City of San Antonio	105,608

## 3.10.1 Effects of the Proposed Action

Expansion of the cemetery would create a minor number of temporary construction-related jobs. Maintenance activities associated with a larger developed cemetery area may require additional employees, which would create a minor number of permeant maintenance jobs. The cemetery expansion would continue to serve the veteran population and surrounding Bexar County with internment services. No area residences would be displaced due to the Proposed Action.

## **3.10.2** Effects of the No Action Alternative

The no action alternative would not create additional temporary construction jobs and long term FSHNC jobs. The lack of internments options would not follow the VA directive to provide internments options to local veterans.

## **3.11 Community Services**

The National Cemetery has provided interment options for area Veterans and their families since 1926. The proposed cemetery expansion would increase capacity by 42,782 gravesites. The 647 bus A stop at Towers Park and Harry Wurzbach Road (1.04 miles southwest of FSHNC) and B stop at the Rittman Road and Harry Wurzbach Road intersection (0.48-mile northeast of FSHNC) are the closest bus stops, and options for taxis and other transportation services are available.

## **3.11.1 Effects of the Proposed Action**

The construction of the Proposed Action is anticipated to have no effect to area community services. The increased interment capacity would result in increased service to Veterans and their families. Additional interment capacity would be generated, and Veterans and their families would not need to travel long distances to access burial benefits. The creation of roadways would not impact emergency vehicle access as the all roadways are continuous not impeding emergency vehicle turn around and the VA will design roadways to follow emergency vehicle access and safety requirements.

## **3.11.2 Effects of the No Action Alternative**

Under the No Action Alternative, existing cemetery operations would continue until existing capacity is reached. The closest VA National Cemetery to Fort Sam Houston while staying within the state is the Houston National Cemetery in Houston. This in turn will preclude local San Antonio, TX veterans and their families to receive the honor and earned privilege of burial in a VA National Cemetery, surviving Veterans and families would have to travel approximately 182 miles to Houston. This action exceeds the NCA requirement of The No Action alternative would have a long-term adverse effect on Veteran burial services.

## 3.11.3 Minimization/Management Measures

If the proposed action is utilized, roadways will be designed to allow proper emergency vehicle access and follow safety requirements.

## **3.12 Solid Waste and Hazardous Materials**

Historical use of the site by the US Army prior to a land transfer in 2001 to the VA has led to buried waste in the form of two landfills (Figure M). These landfills boundaries were broadly defined in an Environmental Assessment for the real estate land transfer (Contract Number: DACA63-97-D-0049-0016) dated August 2001. During previous water main installation and a later Phase 2 cemetery expansion project, VA discovered additional buried waste. VA completed investigation, sampling and remediated a portion of the area where improvements where constructed. As part of Phase 3 expansion planning, a waste classification sampling report was completed by Terracon Consulting Inc. on July 13, 2020. Eight borings were conducted within the investigation area (Appendix A, Figure M). Soil samples were collected from an interval selected during the drilling activities suspected to have the greatest potential to be impacted. Three additional borings were conducted south of the investigation area that showed no evidence of buried waste. 15 samples were sent for laboratory analysis and analyzed for more than 150 contaminants. Of those 150 contaminants, less than 35 were detected at concentrations exceeding the sample detection limit (SDL) and only one contaminant exceeded the applicable regulatory limit. Based on the limitations and information presented in this report, Terracon concludes the following: The soil samples do not exhibit a characteristic of a hazardous waste; the concentrations detected in the soil samples are less than the regulatory limits for Class 1 non-hazardous waste except for acrylamide in Area 2 where boring 5-A was located; and the completed checklist indicates the non-regulated waste would meet the definition of a Class 2 non-hazardous waste except for Area 2 where acrylamide was detected at a concentration exceeding the regulatory limit for Class 1 non-hazardous waste.

## **3.12.1 Effects of the Proposed Action**

Construction of the Proposed Action would produce only temporary effects relating to solid waste or hazardous materials. Minor potential effects may include wastes from vehicle operating fluids such as oil, diesel, gasoline, and anti-freeze from construction equipment and vehicles at the site during the initial construction phase.

Construction and operation of the Proposed Action will require storage and removal of solid waste and hazardous materials. Construction and operation of the proposed action will require the disposal of regulated waste along with non-hazardous class 2 waste as described in the waste sampling report mentioned above.

## **3.12.2 Effects of the No Action Alternative**

Under the No Action alternative, there would be adverse effects relating to solid waste or hazardous materials, as the existing waste buried on site would not be removed and properly disposed of. The no action alternative would leave unpermitted landfills and waste on site, which would hinder future projects and continue to negatively impact soil quality.

## 3.12.3 Minimization/Management Measures

Management of adverse effects, including releases, would be addressed immediately through implementation of a Site Safety Spill Prevention Plan that would have been developed before construction commenced. No significant long-term effects would result from solid waste or hazardous materials.

Any hazardous materials that were necessary during construction would be stored in an area designated for such materials. Other fuels and liquids related to cemetery maintenance and located in the maintenance building would be stored appropriately in a locked cabinet. Additionally, proper housekeeping practices and proper disposal of solid waste and hazardous materials would be adhered to during construction and operation of the cemetery.

During construction, minimization/management measures would result in less-than-significant shortterm impacts to solid waste and hazardous materials. During operation, minimization/management measures would result in less-than-significant long-term impacts during operation to solid waste and hazardous materials.

If the buried waste is encountered during construction activities, it will be excavated or otherwise

removed from the ground as part of renovation or construction activities, the generated waste and impacted soils would be properly managed and disposed offsite at appropriate landfill facility. VA will develop a Phase 3 Waste Response Action Work Plan will describe the procedures to be followed including, but not limited to:

- Separating the regulated medical waste from the other waste streams;
- Conducting a hazardous waste determination on waste found in a container, where the residue has not been removed and the container has not been rendered useless;
- Managing the waste from Areas 1 and 3 as Class 2 non-hazardous waste; and
- Managing the waste from Area 2 as Class 1 non-hazardous waste. Alternatively, additional samples from Area 2 may be analyzed for toxicity characteristic leaching procedure (TCLP) acrylamide to make a Class II determination in coordination with the landfill.

## **3.13 Transportation and Parking**

## **3.13.1 Effects of the Proposed Action**

During construction, increased traffic would consist of trucks, contractor vehicles, and construction equipment. Installation and connection of utilities could also impact local roadways through the potential need for temporary lane closures around the area. Based on the current traffic volumes listed for the roadways around the site, the likely increase in construction traffic volumes would be during morning and evening peak travel periods. Short term parking requirements for construction vehicles will be followed to limit adverse effects to soil quality and water quality as shown in 3.13.3 Minimization/Management Practices.

During operation, visitors travel at various times during the day during daylight hours, likely outside of peak travel times. Staff at the National Cemetery commute to and from work during peak travel hours (7:00-8:00 a.m. and 4:30-6:00 p.m.). Funeral processions may have periodic, short-term traffic effects at peak times.

## **3.13.2 Effects of the No Action Alternative**

Under the No Action alternative there would be no changes to transportation and parking issues related to the proposed expansion area.

## 3.13.3 Minimization/Management Measures

Construction is anticipated to temporarily increase traffic of vehicles and impacts to utilities along roadways. VA plans to use a contractor specific route as part of a COSA project that will limit traffic on the main streets around the VA project area specifically but not limited to Harry Wurzbach Avenue. City road construction will be complete prior to the proposed action timeframe if the proposed action is chosen. Follow parking area BMPs outlined in sections 3.4 Geology, Topography, and Soils and 3.5 Hydrology and Water Quality.

## 3.14 Utilities

## Electrical

Existing Administration Building

The administration building was built in 2008 and does not appear to have had any major electrical upgrades since its initial construction. The existing light fixtures are all from the original building and utilize T8 lamps. Existing electrical distribution is in good condition and has some spare capacity.

Project will replace existing light fixtures with new LED lights and controls.

## Existing Maintenance Building and Complex

An office addition was added to this building in 2008, along with a new standalone equipment storage building. During the 2008 additions (3) three branch circuit panels were added in the maintenance building to serve new ac equipment, lights, receptacles and miscellaneous equipment. A new branch circuit panel was provided in the equipment storage building and connected to a maintenance building panel. The existing lighting in the maintenance building, are from the original building/addition and utilize high efficiency fluorescent lamps and metal halide. Existing electrical distribution equipment has ample capacity for future expansions or upgrades to the system. Existing lights will be replaced with LED lights. Project will rework Fire Alarm System devices in renovated space as required via performance specification listed in the VA master construction specifications section 28-46-00 fire alarm and suppression.

## PIC Building

Project will provide power and new LED lighting to renovated spaces. Existing electrical distribution equipment is in good condition and has spare capacity for renovation scope. Project will rework Fire Alarm System devices in renovated space as required via performance specification listed in the VA master construction specifications section 28-46-00 fire alarm and suppression.

## New Honor Guard Building

Project will provide new electrical service to new building from Exterior Panel located at entrance to site at the intersection of Ft Sam Houston and Harry Wurzbach Road. Project will provide power, LED lighting and fire alarm system/devices as required.

## Plumbing

## Existing Maintenance Building and Complex

The renovated toilets and locker rooms will receive new plumbing fixtures. The new fixtures will be low flow style with manual flush valves and automatic hardwired sensor faucets. The installation of this type of fixtures will aid on the minimization of water consumption and ultimately support sustainability standards. New showers with thermostatic mixing valves will be added.

## New Honor Guard Building

The Honor Guard Building will include a new 2-inch water service for any new plumbing fixtures. New fixtures will be low flow fixtures with manual flush and hard wired sensor faucets. The installation of this type of fixtures will aid on the minimization of water consumption and ultimately support sustainability standards.

No fire sprinkler system is planned for the new Honor Guard Building.

## Potable water and Irrigation

A 2" potable water line will be added to the new honor guard building which will be connected to the main line running through the cemetery.

Irrigation systems on the site will be upgraded to provide more energy and water efficiency by utilizing more modern and efficient technology.

## **3.14.1 Effects of the Proposed Action**

Under the Proposed action, minimal upgrades to the new honor guard building and the existing infrastructure will occur as needed to meet the needs of the site and upgrade outdated systems.

## 3.14.2 Effects of the No Action Alternative

Under the No Action Alternative, there would be no effects relating to utilities on the site, as the Cemetery would not be expanded. Old systems with limitations will be left in place and less efficient irrigation systems will remain in place.

## 3.14.3 Minimization/Management Measures

Coordination is underway with the City of San Antonio to ensure proposed expansion utility elements do not exceed capacity provided to the site.

## **3.15 Environmental Justice**

In addition to considering socioeconomic information for the area surrounding the FSHNC, federal agencies are required through Executive Order 12898 set forth in 1994 to focus attention to minority and low-income communities that may be adversely affected by environmental conditions and impacts to human health at a disproportionately higher rate than other communities.

<u>Minority Populations</u>: Persons of Hispanic origin of any race, American Indian and Alaskan Native, Asian, African American and Native Hawaiian or Pacific Islander. (US Census Bureau, 2018)

**Low Income Populations:** families living at or below the poverty line, based on an annual income of \$24,600 or less for a family of 4. (US Department of Health and Human Services, 2017)

## **3.15.1 Effects of the Proposed Action**

The Proposed Action would occur entirely within the boundaries of the National Cemetery. Neither construction nor the operation of the proposed cemetery expansion would result in the displacement of residences and no adverse effect would be imposed on the greater community or disproportionately affect either minority or low-income populations.

## **3.15.2 Effects of the No Action Alternative**

Under the No Action alternative, existing cemetery operations would continue until existing capacity is reached. The FSHNC is located in the City of San Antonio and the closest VA National Cemetery within Texas is the Houston National Cemetery in Houston. In order for Veterans and their families to receive the honor and earned privilege of burial in a VA National Cemetery, surviving Veterans and families would have to travel approximately 182 miles to Houston. NCA's objective of providing Veterans with a dignified burial option within 75 miles of their home would not be met. Low-income individuals may be disproportionately affected by bearing this extra expense, related to travel, to use burial benefits. Based on this information, The No Action Alternative would contribute to a long-term adverse impact to these sensitive community services.

## 3.15.3 Minimization/Management Measures

During construction, effects on adjacent land uses, such as through noise and dust, would be limited and controlled, thereby minimizing adverse effects to local populations.

Additionally, construction of the Proposed Action represents an anticipated short-term positive socioeconomic impact to local employment and personal income.

## **3.16 Cumulative Impacts**

As defined by, the CEQ regulations (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 actions, without regard to the agency (federal or non-federal) or individual who undertakes such other actions."

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.

## **3.16.1 Considered Cumulative Effects**

The Proposed Action would retain many of the current features at the site, while preserving natural resources through environmentally sensitive development. The Proposed Action is generally consistent with surrounding land uses, and, as such, would not produce any cumulative land use effects in the area.

Under the No Action alternative, no cumulative impacts are anticipated.

## 3.16.2 Effects of Cumulative Actions Under the Proposed Action Alternative

No planned federal or other large projects in the vicinity of the Project are known at the time of this assessment. These potential effects are reduced through careful coordination and implementation of general BMPs, avoidance and management measures (Section 5.0), and compliance with regulatory requirements as identified throughout Section 11.0. Given the nature of the Proposed Action, and the lack of other nearby projects, no significant cumulative adverse effects to any reviewed resource areas are anticipated.

Close coordination with state and local agencies would serve to manage and control any potential cumulative environmental effects within the region, including managing regional transportation increases with adequate infrastructure. Implementation of land use and resource management plans would serve to control the extent of adverse environmental effects, and proper planning would ensure future socioeconomic conditions maintain, if not improve, the local standard of living. Implementation of effective resource management plans and programs should minimize or eliminate any potential cumulative degradation of the natural ecosystem. Moving forward with the proposed action would also remediate the unpermitted landfill, benefitting soil quality and the overall FSHNC.

## **3.16.3 Effects of Cumulative Actions Under the No Action Alternative**

Under the No Action alternative, no cumulative impacts are anticipated. The existing property would remain in its current land use. Failure to implement the Proposed Action would result in a regional, potentially significant, adverse cumulative community services and environmental justice effect on those Veterans in the FSHNC area. Specifically, VA would not be able to provide these veterans with a suitable, relatively local National Cemetery for proper interment. Veterans would be required to use another National Cemetery, if available, or another burial option, and they may not be able to use the earned benefit of no-cost burial at a National Cemetery. The no action alternative would also leave unpermitted landfills and waste on site, which would hinder future projects and continue to negatively impact soil quality.

## **3.17 Potential for Generating Substantial Controversy**

As discussed in Section 4.0, VA will solicit input from various Federal, State, and local government agencies regarding the Proposed Action.

It is not anticipated that there will be substantial public controversy regarding the Preferred Action Alternative based on any of the less-than-significant effects described in this EA and responses during the draft EA 30-day public involvement period. Any public comments resulting from this 30-day period have been addressed as part of this EA and included in the document.

## Section 4.0 Public Involvement

VA invites public participation in decision-making on new proposals through the NEPA process. Public participation with respect to decision making on the Proposed Action is guided by 38 CFR 26, VA's policy and regulations for implementing NEPA. Additional guidance is provided in the VA's NEPA Interim Guidance for Projects (VA 2010). Consideration of the views and information of all interested persons promotes open communication and enables better decision making. Agencies, organizations, and members of the public with a potential interest in the Proposed Action, such as area residents, interested organizations, and disadvantaged persons are urged to participate.

## 4.1 Public Involvement

As the Federal proponent of this Proposed Action, the VA will publish and distribute this draft EA for at least a 30-day public comment period. The public comment period will initiate through the publication of a Notice of Availability (NOA) in local newspapers. This publication will occur on 2 non-consecutive days, one being a Sunday. Copies of the draft EA available for review and download will be accessible through the VA's website at https://www.cem.va.gov/ea.asp. VA will also submit a draft EA to interested agencies for comment concurrent with the public comment period, upon request. See Appendix B for supplementing information.

## 4.2 Agency Coordination

The Interagency and Intergovernmental Coordination for Environmental Planning is a federally mandated process for informing and coordinating with other governmental agencies regarding federal Proposed Actions. As part of the NEPA process (42 USC 4331 Section 102), several public agencies were consulted to provide preliminary input on potential environmental effects on resources under their jurisdiction within the Proposed Action area and provide any relevant information. Below is a list of agencies contacted as part this EA. In addition, a sample of the scoping letter, the contact information, and the scoping comments from the agencies are contained in Appendix B.

#### Federal Agencies

US Environmental Protection Agency, Region 6 US Army Corps of Engineers – Fort Worth Regulatory Division (CESWF-DE-R) Natural Resource Conservation Service -- Texas State Office US Air Force JBSA -- Lackland NEPA Program US Fish and Wildlife Service – Southwest regional Office

#### State Agencies

Texas Parks and Wildlife Department Texas Veterans Commission Texas Historical Commission Texas Commission on Environmental Quality Texas Water Development Board

## Local Agencies

City of San Antonio Planning Department Bexar County Public Works -- Development Services Section

## 4.3 Native American and Section 106 Consultation

In accordance with Section 106 of National Historic Preservation Act, EO 13175, and the Native American Graves Protection and Repatriation Act, VA sent letters asking for input to federally recognized tribes in the region that may attach religious or cultural significance to the property affected by the Proposed Action. Native American Tribes with possible ancestral ties to the project area were contacted (HUD 2019). A letter was sent to each of the Tribes listed below:

- Coushatta Tribe of Louisiana
- Comanche Nation
- Alabama-Coushatta Tribe of Texas
- Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie)
- Tonkawa Tribe of Indians of Oklahoma
- Apache Tribe of Oklahoma
- Mescalero Apache Tribe of the Mescalero Reservation, New Mexico

See Appendix B for correspondence. Additionally, in accordance with Section 106 of the National Historic Preservation Act and 36 CFR Part 800, VA started consultation with the State Historic Preservation Office, Texas Historical Commission. See Section 3.3 for a discussion and Appendix D for State Historic Preservation Office's letter.

## Section 5.0 Management and Minimization Measures

This section summarizes the management and minimization measures identified in Section 3.0 that are proposed to reduce and avoid potential adverse effects of the Proposed Action. In addition, any unforeseen adverse cumulative effects would be offset or minimized through consultation and compliance with statutory and regulatory processes already in place in the State of Texas. Section 11.0 provides a list of environmental permits that would apply to the Proposed Action.

Anticipated management measures for the Proposed Action, based on the analysis in this EA, are summarized in Table 4. "Management measures" are defined as routine BMPs or regulatory compliance measures that are regularly implemented as part of proposed activities, as appropriate, across Texas. Per established protocols, procedures, and requirements, VA (and VA's design and construction contractors) would implement BMPs and would satisfy all applicable regulatory requirements in association with the design, construction, and operation of the Proposed Action.

In general, implementation of BMP and minimization measures would maintain effects at acceptable levels for all resource areas analyzed. These are different from "minimization measures," which are defined as project-specific requirements, not routinely implemented as part of development projects, necessary to reduce identified potentially significant adverse environmental effects to less-than-significant levels.

Table 4 provides a summary of BMPs/minimization measures that would be incorporated in the Proposed Action to ensure potential adverse effects are controlled or further reduced.

#### Table 8. Management and Minimization Measures

Resource Area	Management and Minimization Measures									
Aesthetics	<ul> <li>maintaining and adding trees, shrubs, and native grasses to the site perimeter to obstruct views of construction and to later incorporate it into the cemetery design.</li> <li>create and routinely maintain landscaped areas, buildings, roadways and signage.</li> <li>implement the construction related BMPs for dust control described Section 3.2.</li> <li>As historical resources are located on site, utilizing historical visual aesthetics described in Section 3.3 Cultural Resources and further defined in Section 106 consultation with the Texas SHPO will be required.</li> </ul>									
Air Quality	<ul> <li>Maintain engines and exhaust systems in good working order.</li> <li>Reduce vehicle idle times in accordance with VA Directive 0637.</li> <li>Comply with Texas Commission on Environmental Quality (TCEQ) air quality regulations.</li> <li>Use appropriate dust suppression methods during demolition and construction activities. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspending earth-moving activities during high wind conditions.</li> <li>Maintain an appropriate speed to minimize dust generated by vehicles and equipment on unpaved surfaces.</li> <li>Cover haul trucks with tarps.</li> <li>Stabilize disturbed areas through re-vegetation or mulching of the area that would be inactive for several weeks or longer and upon completion of site preparation.</li> <li>Visually monitor all demolition and construction activities regularly, particularly during extended periods of dry weather, and implement dust control BMPs when appropriate.</li> <li>Communicate dust reducing BMPs to personnel.</li> <li>Address air quality issues as they arise. Utilize emission reduction measures laid out in the 2018-2020 City of San Antonio – Ozone Action Day Plan during high ozone days and encourage construction to the logative benefities.</li> </ul>									
Cultural Resources	<ul> <li>Project construction activities would adhere to all federal cultural preservation regulations as well as stipulations in the 2009 PA, 2014 MOA, and 2017 amendments.</li> <li>In the event human remains or other cultural items are found, as defined by the Native American Graves Protection and Repatriation Act (NAGPRA) were found during construction or operation of the national cemetery, work would be halted in the area and the appropriate authorities would be contacted.</li> <li>The design of the Honor Guard Building will follow the mitigation and design standards laid out in SHPO consultation and prior PAs and</li> </ul>									
	MOAs.									
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	• VA would secure any required, individual minor air emissions permits from the TCEQ, as appropriate, and based on the final design and prior									
	to construction and operation of the proposed expansion area.									
	• The construction contractor would develop a stormwater pollution									
Geology, Topography,	prevention plan and obtain NPDES Construction General Permit									
and soils	coverage from TCEQ for the Proposed Action.									
	• The construction contractor would implement the NPDES permit to									
	protect surface water quality.									
	• Design paved areas to drain to the stormwater management system;									
	• Install and maintain BMPs, such as silt fences and water breaks,									
	stormwater detention basins, filter fences, sediment berms,									
	interceptor ditches, straw bales, riprap, or other sediment control									
	structures.									
	Re-spread stockpiled topsoil.									
	<ul> <li>Seed/re-vegetate areas temporarily cleared of vegetation.</li> </ul>									
	<ul> <li>Retain onsite vegetation to the maximum extent possible.</li> </ul>									
	<ul> <li>Plant and maintain soil-stabilizing vegetation on disturbed areas.</li> </ul>									
	Use native vegetation to re-vegetate disturbed soils.									
	Project would implement all pertinent Federal state and local									
Hydrology and Water	regulatory requirements and use environmentally sensitive site design.									
Quality	stormwater pollution prevention controls, good engineering practices									
	and construction best management practices.									
	• Implement appropriate groundwater engineering controls should									
	groundwater be encountered during construction.									
	<ul> <li>Implement stormwater management facilities designed to retain excess</li> </ul>									
	stormwater runoff.									
	• A SWPPP will be incorporated in the plan set									
	• Construction would be timed to avoid nesting periods of migratory									
Wildlife and Habitat	birds on the site and protected under the Migratory Bird Treaty Act.									
	This Act prohibits the taking of migratory birds, their nests, and eggs.									
	• Native species would be used to the greatest extent practicable when									
	re-vegetating land disturbed by construction to avoid the potential									
	introduction of non-native or invasive species and reduce water use.									
	• Pollinator-friendly native species would be used to the greatest extent									
	practicable in landscaping selections.									
	• Should construction clearing and grading be unavoidable during the									
	migratory bird nesting season (April to mid-July), a qualified biologist									
	would verify the absence of biological resources.									
	• The VA will apply for a COSA Tree Preservation Permit prior to									
	construction activities.									
	• These measures would be briefed to the contractor at the construction									
Noise	kick-off meeting, and daily at tailgate safety meetings. The onsite									
	construction manager would be responsible for addressing any noise									
	issues that may arise.									
	• Abide by VA project requirements that limits hours of the day in which									
	construction equipment can be used.									

	<ul> <li>Coordinate proposed construction activities in advance with adjacent sensitive receptors. Let the residents know what operations would be occurring at what times, including when they would start and when they would finish each day. Post signage, updated daily, at the entry points of the site providing current construction information, including schedule and activity.</li> <li>Limit, to the extent possible, construction and associated heavy truck traffic to occur between 6:00 a.m. to 10 p.m. Sunday through Thursday and 6:00 a.m. to 11:00 p.m. Friday and Saturday according to COSA Code of Ordinances Article III-Noise. This measure would reduce noise effects during sensitive night-time hours.</li> <li>Ensure construction personnel abide by Occupational Health and Safety Administration noise protection requirements.</li> <li>Select material transportation routes as far away from sensitive receptors as possible.</li> <li>Shut down noise-generating heavy equipment when it is not needed.</li> <li>Maintain noisy equipment per manufacturer's recommendations.</li> <li>Encourage construction personnel to operate equipment in the quietest manner practicable (such as, speed restrictions, retarder brake restrictions, and engine speedrestrictions).</li> <li>Implementation of these BMPs would reduce the potential for short-term adverse noise effects to acceptable levels, notably for nearby sensitive receptors.</li> </ul>
Land Use	<ul> <li>Construction activities would comply with applicable permit(s) from the</li> </ul>
Floodplains and Wetlands	<ul> <li>USACE and State agencies. Additionally, construction activities would comply, to the extent possible, with local agencies' requirements, to minimize adverse effects to wetlands/Waters of the U.S. General construction practice BMPs would also be implemented to prevent any potential hydraulic oil spills.</li> <li>Inspect and maintain construction vehicles in good working order and maintain a spill kit. Implement stormwater BMPs.</li> <li>Based on the burial layout, the flood plain modification does not require any additional cutting as the water surface elevation remains unaffected.</li> </ul>
Socioeconomics	None.
Community Services	<ul> <li>If the proposed action is utilized, roadways will be designed to allow proper emergency vehicle access and follow safety requirements.</li> </ul>
Solid Waste and Hazardous Materials	<ul> <li>Management of adverse effects, including releases, would be addressed immediately through implementation of a Site Safety Spill Prevention Plan that would have been developed before construction commenced. No significant long-term effects would result from solid waste or hazardous materials.</li> <li>Any hazardous materials that were necessary during construction would be stored in an area designated for such materials. Other fuels</li> </ul>

#### 5.1 Management and Minimization Measures

With implementation of routine "management measures," the Proposed Action would not result in significant adverse effects to the current environmental setting associated with any of the technical resource areas.

#### 5.2 Design Avoidance

VA would implement the following design avoidance measures to reduce potential effects to Waters of the U.S. to acceptable, less-than-significant levels.

**Waters of the U.S.** Avoid adjacent surface water resources to the greatest extent possible during the site design process. Consult with and obtain permits, as necessary, from USACE under Section 404 and TCEQ under Section 401 of the Clean Water Act to minimize adverse effects to jurisdictional surface water resources prior to construction. VA anticipates that final cemetery design would maintain a buffer of undisturbed land around the identified surface water resources. However, in case such effects to the Waters of the U.S. cannot be avoided, if any, VA would obtain and comply with all necessary permits from the state and federal (USACE) agencies.

#### Section 6.0 Summary and Conclusion

This EA analyzes the potential environmental effects of VA's Proposed Action to construct and operate the expansion of the Fort Sam Houston National Cemetery, San Antonio, TX.

This EA evaluates two alternatives:

1) Proposed Action Alternative: construct and operate an expansion of the FSHNC on the site, thus meeting the purpose and need; and

2) No Action Alternative: do not construct the proposed National Cemetery expansion and do not meet the purpose and need.

This EA evaluates possible effects to aesthetics; air quality; cultural resources; geology, topography and soils; hydrology and water quality; wildlife and habitat; noise; land use; floodplains and wetlands; socioeconomics; community services; solid and hazardous materials; transportation and parking; utilities; environmental justice; cumulative effects; and potential for generating substantial controversy. To date, no significant impacts have been identified in this EA.

Comments received during the course of the public comment period have been incorporated into this Final EA. Comments received during the public comment period are contained in Appendix B.

#### Section 7.0 List of Preparers

#### **U.S. Department of Veterans Affairs**

Fernando Fernandez - Environmental Engineer; Office of Construction & Facilities Management

William E. Hooker, III - Historical Architect; National Cemetery Administration

**Anderson Engineering of Minnesota, LLC** 13605 1<sup>st</sup> Avenue North, Suite 100 Plymouth, Minnesota 55441

Ben Hodapp - Senior Environmental Specialist

Wyatt Benton - Environmental Associate

Joe Aden - Geographic Information System Specialist

Eric Sautbine - Project Manager

#### Section 8.0 References

EO 11988, Floodplain Management. 1977.

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EO 13045, Protection of Children from Environmental Health Risks and Safety Risks. 1997. EO 13834, *Efficient Federal Operations*. 2018.

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## Section 9.0 List of Acronyms and Abbreviations

ACHP	Advisory Council on Historical Preservation
	American Indian Religious Freedom Act Area of Potential Effect
	Air Quality Control Regions
	Air Quality Indox
	Archaological Resource Protection Act
ARPA	Archeological Resource Protection Act
DND	Post Management Practice
	Council on Environmental Quality
	Populatory Division Fort Worth District USACE
	Code of Enderal Populations
	Clean Air Act
	Clean Air Act
	City of San Antonio
	decibels. A weighted scale
	Department of Transportation
	Environmental Impact Statement
EI3	Evocutivo Ordor
EO	Executive Order
	Enderal Emergency Management Agency
	Finding of No Significant Impacts
	Finding of No Significant impacts
	Farmand Protection Policy Act
	Hazardous Air Pollutant
	Information for Planning and Consultation
JDSA	Momorandum of Agroomont
	National Comptony Administration
	National Environmental Policy Act of 1060
	National Listoric Procentation Act
	National Institute of Occupational Safety and Health
	National Pollutant Discharge Elimination System
	National Politicant Discharge Emmination System
	Programmatic Agroament
	State Historical Preservation Office
SILFO	Stare Historical Preservation Office
	Toyas Commission on Environmental Quality
	Toxicity characteristic leaching procedure
TDAT	Tribal Directory Preservation Tool
THC	Texas Historical Commission
	Texas Parks and Wildlife Department
TWDB	Texas Water Development Board
TVC	Texas Veterans Commission
	US Army Corps of Engineers
	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USEWS	US Fish and Wildlife Service
USGS	United States Geological Survey
VA	Department of Veteran Affairs

#### Section 10.0 List of Agencies, Organizations and Persons Consulted

#### <u>Federal</u>

CESWF-DE-R 819 Taylor Street, Room 3A37 P.O. Box 17300 Fort Worth, Texas 76102-0300

Director Amy Lueders USFWS Southwest Regional Office P.O. Box 1306 Albuquerque, New Mexico 87103-1306

Mrs. Seager EPA Region 6 Main Office 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202

Brannon Sledge NRCS Texas State Office 101 South Main Street Temple, Texas 76501

Mr. Seth Smith and Patricia Salas-Seyfarth US Air Force JBSA-Lackland NEPA Program 1555 Goth St. JBSA, TX 78236-5568 State

Mr. Hooten Texas Parks and Wildlife Department - Wildlife Division Wildlife Habitat Assessment Program 4200 Smith School Road Austin, Texas 78744-3291

Director Thomas Palladino Texas Veterans Commission P.O. Box 12277 Austin, Texas 78711-2277

Mr. Vaughn Aldredge Texas Historical Commission P.O. Box 12276 Austin, Texas 78711

Mr. Joel Anderson TCEQ Region 13 14250 Judson Road San Antonio, Texas 78233-4480

Mr. Michael Senger Texas Water Development Board 1700 North Congress Avenue P.O. Box 13231 Austin, Texas 78711-3231

#### Local

Director Bridgett White City of San Antonio Planning Department 111 Soledad, Suite 650 San Antonio, Texas 78205

Mr. Brach Bexar County Public Works Development Services Section 1948 Probandt Street San Antonio, Texas 78214

Mrs. Joan Gaither Preservation Fort Sam Houston PO Box 340308 Fort Sam Houston, Texas 78234

Dr. Felix D. Almaraz, Jr. Bexar County Historical Commission 101 W. Nueva St. Suite 930 San Antonio, TX 78205

Mr. Vincent Michael San Antonio Conservation Society 107 King William St. San Antonio, Texas 78204 <u>Tribal</u>

Ms. Linda Langley Coushatta Tribe of Louisiana PO Box 10 Elton, Louisiana 70532

Ms. Martina Callahan Comanche Nation 6 SW D Avenue Lawton, Oklahoma 73502

Mr. Bryant Celestine Alabama-Coushatta Tribe of Texas 571 State Park Road 56 Livingston, Texas 77351

Mr. Gary McAdams Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie) PO Box 729 Anadarko, Oklahoma 73005

Ms. Lauren Norman-Brown Tonkawa Tribe of Indians of Oklahoma 1 Rush Buffalo Road Tonkawa, Oklahoma 74653

Chairman Lyman Guy Apache Tribe PO Box 1330 Anadarko, Oklahoma 7300

Ms. Holly Houghten Mescalero Apache Tribe of the Mescalero Reservation PO Box 227 Mescalero, New Mexico 88340

## Section 11.0 List of Environmental Permits Required

- Conditional Letter of Map Revision FEMA Permit
- Letter of Map Revision FEMA Permit
- COSA Floodplain Development Permit
- COSA Tree Preservation Permit
- COSA Building Permit
  - Honor Guard Building
  - Equipment Storage Building
  - o Material Storage Building
  - Administration Building
- National Pollutant Discharge Elimination System (NPDES) Permit
- Stormwater Pollution Prevention Plan

Appendix A: Figures



## Figure A Site Location





## Figure B Site Aerial



#### **Legend**







**P** 763.412.4000 **F** 763.412.4090 **ae-mn**.com





## **Figure C** Master Plan



#### Legend

Ft. Sam Houston NC Property Boundary Previously Phased Development Phase 3 Development Future Development Undeveloped



#### A NDERSON 13605 1st Ave N #100, Plymouth, MN 55441 P 763.412.4000 F 763.412.4090 ae-mn.com





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CS-105



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## **Figure E** Geology Site Map





#### Knb (Late Cretacious)

- QTu (Pilocene to Pleistocene)
- Kpg (Late Cretacious)
- Qt (Pleistocene to Holocene)



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## Figure F Topographic Map





## **Figure G** Bexar County Soil Survey Map



#### Legend

Ft. Sam Houston NC Property Boundary Hydric Rating by Map Unit 0% Hydric Components 1-32% Hydric Components 33-65% Hydric Components 66-99% Hydric Components 100% Hydric Components



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SOURCE: TxDNR, USDA, ESRI, TIGER, Bing, Bexar Co., Anderson Engineering



## **Figure H** Bexar County Zoning Map





## Figure I FEMA Floodplains/Waterways Map



P 763.412.4000 F 763.412.4090 ae-mn.com

Bexar County, TX
SOURCE: TxDNR, USDA, ESRI, TIGER, Bing, Bexar Co., Anderson Engineering



## **Figure J** Floodplain Impact Areas



#### **Legend**

Ft. Sam Houston NC Property Boundary Existing Modeled 100-Year Floodplain (Pape-Dawson) Proposed 100-Year Floodplain (Pape-Dawson) Floodplain Impact Area



#### A **DERSON** 13605 1st Ave N #100, Plymouth, MN 55441 **P** 763.412.4000 **F** 763.412.4090 **ae-mn**.com





## Figure K National Wetland Inventory Map







## **NDERSON** 13605 1st Ave N #100, Plymouth, MN 55441

P 763.412.4000 F 763.412.4090 ae-mn.com



SOURCE: TxDNR, USDA, ESRI, TIGER, Bing, Bexar Co., Anderson Engineering



## Figure L Wetland Delineation Map



#### Legend

Ft. Sam Houston NC Property Boundary Project Limits Streams Delienated by RCK (2019-2020) Wetlands Delineated by RCK (2019-2020)



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#### Figure M Buried Waste Sites



#### Legend

Ft. Sam Houston NC
 Property Boundary
 Remediated Landfill
 per Deed Declaration
 recorded July 15, 2005
 Approx. Waste Remediation
 Area (2019)
 Approx. Buried Waste Extent
 per 2019 Investigation
 Approx. Buried Waste Extent
 per June 2020 Investigation



#### A NDERSON 13605 1st Ave N #100, Plymouth, MN 55441 P 763.412.4000 F 763.412.4090 ae-mn.com



SOURCE: TxDNR, USDA, ESRI, TIGER, Bing, Bexar Co., Anderson Engineering

## Appendix B: Stakeholder Consultation and Threatened and Endangered Species Coordination



DEPARTMENT OF VETERANS AFFAIRS Office of Construction and Facilities Management Washington DC 20420

November 6, 2019

TCEQ Region 13 Attn: Mr. Joel Anderson 14250 Judson Road San Antonio, Texas 78233-4480

#### Subject: Notice of Intent to Prepare Environmental Assessment Proposed Phase 3 Site Expansion and Improvement for Fort Sam Houston National Cemetery 1520 Harry Wurzbach Rd, San Antonio, Bexar County, Texas 78209

To Mr. Anderson,

The Department of Veterans Affairs (VA) intends to prepare an Environmental Assessment for the proposed Phase 3 Expansion and Improvements project (Project) in the existing Fort Sam Houston National Cemetery in San Antonio, Bexar County, Texas. The cemetery is located at 1520 Harry Wurzbach Road, adjacent to Fort Sam Houston Joint Base San Antonio.

The purpose of the Project is to continue to enable the VA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs of the region for the next 15 years. The proposed Project sets out to expand cemetery facilities by approximately 43 acres and represents a continuation of a planned and anticipated multi-phase cemetery build out. The Project will include 30,013 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, correct infrastructure deficiencies, extend the irrigation system, construct three buildings totaling 4,312 gross square feet and expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking. The Project will develop VA-owned lands previously managed by the U.S. Army. These lands were historically disturbed by Army operations and are currently naturally vegetated.

Previously, the VA completed an Environmental Assessment (EA) during site selection in 1994, resulting in a Finding of No Significant Impact (FONSI). Now as part of the new Phased development the VA is soliciting input on any concerns or applicable information regarding this site expansion for the new EA. Information received will be incorporated into said document. In addition, there will be a public comment period once the draft EA phase is complete.

We greatly appreciate your participation in this matter and ask that you let us know if you have an interest in the proposed project within 30-days from the date when this letter was received. If you would like to comment on the proposed project at this time, please contact Fernando L. Fernández at <u>Fernando.Fernandez@va.gov</u> and reference "Phase 3 Expansion and Improvement of Fort Sam Houston National Cemetery." You may also contact the VA at 202-632-5529 or at the following mailing address:

Department of Veterans Affairs Office of Construction & Facility Management Attn: Fernando L. Fernández 425 I Street, NW Suite 6W317D Washington, DC 20001

Sincerely,

Fernando L. Fernández Environmental Engineer

Encl: Figure A: Project Overview



DEPARTMENT OF VETERANS AFFAIRS OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT WASHINGTON DC 20420

November 6, 2019

Lauren Norman-Brown, Tribal Historical Preservation Officer Tonkawa Tribe of Indians of Oklahoma 1 Rush Buffalo Road Tonkawa, Oklahoma 74653

#### Subject: Notice of Intent to Prepare Environmental Assessment Proposed Phase 3 Site Expansion and Improvement for Fort Sam Houston National Cemetery 1520 Harry Wurzbach Rd, San Antonio, Bexar County, Texas 78209

#### To Lauren Norman-Brown,

The Department of Veterans Affairs (VA) intends to prepare an Environmental Assessment for the proposed Phase 3 Expansion and Improvements project (Project) in the existing Fort Sam Houston National Cemetery in San Antonio, Bexar County, Texas. The cemetery is located at 1520 Harry Wurzbach Road, adjacent to Fort Sam Houston Joint Base San Antonio.

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Sincerely,

Fernando L. Fernández Environmental Engineer

Encl: Figure A: Project Overview



DEPARTMENT OF VETERANS AFFAIRS Office of Construction and Facilities Management Washington DC 20420

November 6, 2019

Texas Parks and Wildlife Department - Wildlife Division Wildlife Habitat Assessment Program 4200 Smith School Road Austin, Texas 78744-3291

#### Subject: Notice of Intent to Prepare Environmental Assessment Proposed Phase 3 Site Expansion and Improvement for Fort Sam Houston National Cemetery 1520 Harry Wurzbach Rd, San Antonio, Bexar County, Texas 78209

To Mr. Hooten,

The Department of Veterans Affairs (VA) intends to prepare an Environmental Assessment for the proposed Phase 3 Expansion and Improvements project (Project) in the existing Fort Sam Houston National Cemetery in San Antonio, Bexar County, Texas. The cemetery is located at 1520 Harry Wurzbach Road, adjacent to Fort Sam Houston Joint Base San Antonio.

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Department of Veterans Affairs Office of Construction & Facility Management Attn: Fernando L. Fernández 425 I Street, NW Suite 6W317D Washington, DC 20001

Sincerely,

Fernando L. Fernández Environmental Engineer

Encl: Figure A: Project Overview



DEPARTMENT OF VETERANS AFFAIRS OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT WASHINGTON DC 20420

November 6, 2019

NRCS Texas State Office 101 South Main Street Temple, Texas 76501

#### Subject: Notice of Intent to Prepare Environmental Assessment Proposed Phase 3 Site Expansion and Improvement for Fort Sam Houston National Cemetery 1520 Harry Wurzbach Rd, San Antonio, Bexar County, Texas 78209

To Mr. Brannon Sledge,

The Department of Veterans Affairs (VA) intends to prepare an Environmental Assessment for the proposed Phase 3 Expansion and Improvements project (Project) in the existing Fort Sam Houston National Cemetery in San Antonio, Bexar County, Texas. The cemetery is located at 1520 Harry Wurzbach Road, adjacent to Fort Sam Houston Joint Base San Antonio.

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Department of Veterans Affairs Office of Construction & Facility Management Attn: Fernando L. Fernández 425 I Street, NW Suite 6W317D Washington, DC 20001

Sincerely,

Fernando L. Fernández Environmental Engineer

Encl: Figure A: Project Overview



DEPARTMENT OF VETERANS AFFAIRS OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT WASHINGTON DC 20420

November 6, 2019

EPA Region 6 Main Office 1201 Elm Street, Suite 500 Dallas, Texas 75270

#### Subject: Notice of Intent to Prepare Environmental Assessment Proposed Phase 3 Site Expansion and Improvement for Fort Sam Houston National Cemetery 1520 Harry Wurzbach Rd, San Antonio, Bexar County, Texas 78209

To Mrs. Seager,

The Department of Veterans Affairs (VA) intends to prepare an Environmental Assessment for the proposed Phase 3 Expansion and Improvements project (Project) within the existing Fort Sam Houston National Cemetery in San Antonio, Bexar County, Texas. The cemetery is located at 1520 Harry Wurzbach Road, adjacent to Fort Sam Houston Joint Base San Antonio.

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Department of Veterans Affairs Office of Construction & Facility Management Attn: Fernando L. Fernández 425 I Street, NW Suite 6W317D Washington, DC 20001

Sincerely,

Fernando L. Fernández Environmental Engineer

Encl: Figure A: Project Overview



DEPARTMENT OF VETERANS AFFAIRS Office of Construction and Facilities Management Washington DC 20420

November 6, 2019

City of San Antonio Planning Department Attn: Director Bridgett White 111 Soledad, Suite 650 San Antonio, Texas 78205

#### Subject: Notice of Intent to Prepare Environmental Assessment Proposed Phase 3 Site Expansion and Improvement for Fort Sam Houston National Cemetery 1520 Harry Wurzbach Rd, San Antonio, Bexar County, Texas 78209

To Director White,\_\_\_

The Department of Veterans Affairs (VA) intends to prepare an Environmental Assessment for the proposed Phase 3 Expansion and Improvements project (Project) in the existing Fort Sam Houston National Cemetery in San Antonio, Bexar County, Texas. The cemetery is located at 1520 Harry Wurzbach Road, adjacent to Fort Sam Houston Joint Base San Antonio.

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Department of Veterans Affairs Office of Construction & Facility Management Attn: Fernando L. Fernández 425 I Street, NW Suite 6W317D Washington, DC 20001

Sincerely,

Fernando L. Fernández Environmental Engineer

Encl: Figure A: Project Overview



DEPARTMENT OF VETERANS AFFAIRS OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT WASHINGTON DC 20420

November 6, 2019

Mr. Seth Smith NEPA Program 1555 Gott St. JBSA, TX 78236-5568

### Subject: Notice of Intent to Prepare Environmental Assessment Proposed Phase 3 Site Expansion and Improvement for Fort Sam Houston National Cemetery 1520 Harry Wurzbach Rd, San Antonio, Bexar County, Texas 78209

To Mr. Smith,

The Department of Veterans Affairs (VA) intends to prepare an Environmental Assessment for the proposed Phase 3 Expansion and Improvements project (Project) in the existing Fort Sam Houston National Cemetery in San Antonio, Bexar County, Texas. The cemetery is located at 1520 Harry Wurzbach Road, adjacent to Fort Sam Houston Joint Base San Antonio.

The purpose of the Project is to continue to enable the VA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs of the region for the next 15 years. The proposed Project sets out to expand cemetery facilities by approximately 43 acres and represents a continuation of a planned and anticipated multi-phase cemetery build out. The Project will include 30,013 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, correct infrastructure deficiencies, extend the irrigation system, construct three buildings totaling 4,312 gross square feet and expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking. The Project will develop VA-owned lands previously managed by the U.S. Army. These lands were historically disturbed by Army operations and are currently naturally vegetated.

Previously, the VA completed an Environmental Assessment (EA) during site selection in 1994, resulting in a Finding of No Significant Impact (FONSI). Now as part of the new Phased development the VA is soliciting input on any concerns or applicable information regarding this site expansion for the new EA. Information received will be incorporated into said document. In addition, there will be a public comment period once the draft EA phase is complete.

We greatly appreciate your participation in this matter and ask that you let us know if you have an interest in the proposed project within 30-days from the date when this letter was received. If you would like to comment on the proposed project at this time, please contact Fernando L. Fernández at <u>Fernando.Fernandez@va.gov</u> and reference "Phase 3 Expansion and Improvement of Fort Sam Houston National Cemetery." You may also contact the VA at 202-632-5529 or at the following mailing address:

Department of Veterans Affairs Office of Construction & Facility Management Attn: Fernando L. Fernández 425 I Street, NW Suite 6W317D Washington, DC 20001

Sincerely,

Fernando L. Fernández Environmental Engineer

Encl: Figure A: Project Overview



DEPARTMENT OF VETERANS AFFAIRS Office of Construction and Facilities Management Washington DC 20420

November 6, 2019

Texas Water Development Board Attn: Mr. Michael Senger P.O. Box 13231 1700 North Congress Avenue Austin, Texas 78711-3231

### Subject: Notice of Intent to Prepare Environmental Assessment Proposed Phase 3 Site Expansion and Improvement for Fort Sam Houston National Cemetery 1520 Harry Wurzbach Rd, San Antonio, Bexar County, Texas 78209

To Mr. Senger,

The Department of Veterans Affairs (VA) intends to prepare an Environmental Assessment for the proposed Phase 3 Expansion and Improvements project (Project) in the existing Fort Sam Houston National Cemetery in San Antonio, Bexar County, Texas. The cemetery is located at 1520 Harry Wurzbach Road, adjacent to Fort Sam Houston Joint Base San Antonio.

The purpose of the Project is to continue to enable the VA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs of the region for the next 15 years. The proposed Project sets out to expand cemetery facilities by approximately 43 acres and represents a continuation of a planned and anticipated multi-phase cemetery build out. The Project will include 30,013 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, correct infrastructure deficiencies, extend the irrigation system, construct three buildings totaling 4,312 gross square feet and expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking. The Project will develop VA-owned lands previously managed by the U.S. Army. These lands were historically disturbed by Army operations and are currently naturally vegetated.

Previously, the VA completed an Environmental Assessment (EA) during site selection in 1994, resulting in a Finding of No Significant Impact (FONSI). Now as part of the new Phased development the VA is soliciting input on any concerns or applicable information regarding this site expansion for the new EA. Information received will be incorporated into said document. In addition, there will be a public comment period once the draft EA phase is complete.

We greatly appreciate your participation in this matter and ask that you let us know if you have an interest in the proposed project within 30-days from the date when this letter was received. If you would like to comment on the proposed project at this time, please contact Fernando L. Fernández at <u>Fernando.Fernandez@va.gov</u> and reference "Phase 3 Expansion and Improvement of Fort Sam Houston National Cemetery." You may also contact the VA at 202-632-5529 or at the following mailing address:

Department of Veterans Affairs Office of Construction & Facility Management Attn: Fernando L. Fernández 425 I Street, NW Suite 6W317D Washington, DC 20001

Sincerely,

Fernando L. Fernández Environmental Engineer

Encl: Figure A: Project Overview



DEPARTMENT OF VETERANS AFFAIRS Office of Construction and Facilities Management Washington DC 20420

November 6, 2019

Texas Veterans Commission Attn: Director Thomas Palladino P.O. Box 12277 Austin, Texas 78711-2277

#### Subject: Notice of Intent to Prepare Environmental Assessment Proposed Phase 3 Site Expansion and Improvement for Fort Sam Houston National Cemetery 1520 Harry Wurzbach Rd, San Antonio, Bexar County, Texas 78209

To Director Palladino,

The Department of Veterans Affairs (VA) intends to prepare an Environmental Assessment for the proposed Phase 3 Expansion and Improvements project (Project) in the existing Fort Sam Houston National Cemetery in San Antonio, Bexar County, Texas. The cemetery is located at 1520 Harry Wurzbach Road, adjacent to Fort Sam Houston Joint Base San Antonio.

The purpose of the Project is to continue to enable the VA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs of the region for the next 15 years. The proposed Project sets out to expand cemetery facilities by approximately 43 acres and represents a continuation of a planned and anticipated multi-phase cemetery build out. The Project will include 30,013 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, correct infrastructure deficiencies, extend the irrigation system, construct three buildings totaling 4,312 gross square feet and expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking. The Project will develop VA-owned lands previously managed by the U.S. Army. These lands were historically disturbed by Army operations and are currently naturally vegetated.

Previously, the VA completed an Environmental Assessment (EA) during site selection in 1994, resulting in a Finding of No Significant Impact (FONSI). Now as part of the new Phased development the VA is soliciting input on any concerns or applicable information regarding this site expansion for the new EA. Information received will be incorporated into said document. In addition, there will be a public comment period once the draft EA phase is complete.

We greatly appreciate your participation in this matter and ask that you let us know if you have an interest in the proposed project within 30-days from the date when this letter was received. If you would like to comment on the proposed project at this time, please contact Fernando L. Fernández at <u>Fernando.Fernandez@va.gov</u> and reference "Phase 3 Expansion and Improvement of Fort Sam Houston National Cemetery." You may also contact the VA at 202-632-5529 or at the following mailing address:

Department of Veterans Affairs Office of Construction & Facility Management Attn: Fernando L. Fernández 425 I Street, NW Suite 6W317D Washington, DC 20001

Sincerely,

Fernando L. Fernández Environmental Engineer

Encl: Figure A: Project Overview



DEPARTMENT OF VETERANS AFFAIRS Office of Construction and Facilities Management Washington DC 20420

November 6, 2019

Bexar County Public Works Development Services Section 1948 Probandt Street San Antonio, Texas 78214

#### Subject: Notice of Intent to Prepare Environmental Assessment Proposed Phase 3 Site Expansion and Improvement for Fort Sam Houston National Cemetery 1520 Harry Wurzbach Rd, San Antonio, Bexar County, Texas 78209

To Mr. Brach,

The Department of Veterans Affairs (VA) intends to prepare an Environmental Assessment for the proposed Phase 3 Expansion and Improvements project (Project) in the existing Fort Sam Houston National Cemetery in San Antonio, Bexar County, Texas. The cemetery is located at 1520 Harry Wurzbach Road, adjacent to Fort Sam Houston Joint Base San Antonio.

The purpose of the Project is to continue to enable the VA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs of the region for the next 15 years. The proposed Project sets out to expand cemetery facilities by approximately 43 acres and represents a continuation of a planned and anticipated multi-phase cemetery build out. The Project will include 30,013 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, correct infrastructure deficiencies, extend the irrigation system, construct three buildings totaling 4,312 gross square feet and expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking. The Project will develop VA-owned lands previously managed by the U.S. Army. These lands were historically disturbed by Army operations and are currently naturally vegetated.

Previously, the VA completed an Environmental Assessment (EA) during site selection in 1994, resulting in a Finding of No Significant Impact (FONSI). Now as part of the new Phased development the VA is soliciting input on any concerns or applicable information regarding this site expansion for the new EA. Information received will be incorporated into said document. In addition, there will be a public comment period once the draft EA phase is complete.

We greatly appreciate your participation in this matter and ask that you let us know if you have an interest in the proposed project within 30-days from the date when this letter was received. If you would like to comment on the proposed project at this time, please contact Fernando L. Fernández at <u>Fernando.Fernandez@va.gov</u> and reference "Phase 3 Expansion and Improvement of Fort Sam Houston National Cemetery." You may also contact the VA at 202-632-5529 or at the following mailing address:

Department of Veterans Affairs Office of Construction & Facility Management Attn: Fernando L. Fernández 425 I Street, NW Suite 6W317D Washington, DC 20001

Sincerely,

Fernando L. Fernández Environmental Engineer

Encl: Figure A: Project Overview



DEPARTMENT OF VETERANS AFFAIRS Office of Construction and Facilities Management Washington DC 20420

November 6, 2019

CESWF-DE-R P.O. Box 17300 819 Taylor Street, Room 3A37 Fort Worth, Texas 76102-0300

### Subject: Notice of Intent to Prepare Environmental Assessment Proposed Phase 3 Site Expansion and Improvement for Fort Sam Houston National Cemetery 1520 Harry Wurzbach Rd, San Antonio, Bexar County, Texas 78209

To Mr. Jasper,

The Department of Veterans Affairs (VA) intends to prepare an Environmental Assessment for the proposed Phase 3 Expansion and Improvements project (Project) in the existing Fort Sam Houston National Cemetery in San Antonio, Bexar County, Texas. The cemetery is located at 1520 Harry Wurzbach Road, adjacent to Fort Sam Houston Joint Base San Antonio.

The purpose of the Project is to continue to enable the VA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs of the region for the next 15 years. The proposed Project sets out to expand cemetery facilities by approximately 43 acres and represents a continuation of a planned and anticipated multi-phase cemetery build out. The Project will include 30,013 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, correct infrastructure deficiencies, extend the irrigation system, construct three buildings totaling 4,312 gross square feet and expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking. The Project will develop VA-owned lands previously managed by the U.S. Army. These lands were historically disturbed by Army operations and are currently naturally vegetated.

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We greatly appreciate your participation in this matter and ask that you let us know if you have an interest in the proposed project within 30-days from the date when this letter was received. If you would like to comment on the proposed project at this time, please contact Fernando L. Fernández at <u>Fernando.Fernandez@va.gov</u> and reference "Phase 3 Expansion and Improvement of Fort Sam Houston National Cemetery." You may also contact the VA at 202-632-5529 or at the following mailing address:

Department of Veterans Affairs Office of Construction & Facility Management Attn: Fernando L. Fernández 425 I Street, NW Suite 6W317D Washington, DC 20001

Sincerely,

Fernando L. Fernández Environmental Engineer

Encl: Figure A: Project Overview

### Fort Sam Houston National Cemetery Bexar County, TX

### Figure A Project Overview



#### Project Area West Actions:

- 1. Rehab existing roads
- 2. Repair/replace stone perimeter wall
- 3. Remodel interior of Public Information Center (PIC)
- 4. Expand parking area for PIC (14 stalls)
- 5. New Honor Guard building (1,238 s.f.)
- 6. Repair Rostrum and concrete walk

#### Project Area East Actions:

- 1. New Equipment Storage building (2,320 s.f.)
- 2. New Material Storage building (800 s.f.)
- 3. Administration building expansion (2,792 s.f.)
- 4. New access road
- 5. New Columbaria
- 6. New Gravesite area with roads



SOURCE: TxDNR, USDA, ESRI, TIGER, Bing, Bexar Co., Anderson Engineering

From: Vincent Michael <<u>vmichael@saconservation.org</u>> Sent: Thursday, February 13, 2020 4:44 PM To: Hooker III, William E. <<u>William.Hooker@va.gov</u>>

Cc: ': 'Patti Zaiontz'' <<u>pattizaiontz@gmail.com</u>>; Virginia Van Cleave <<u>albertv3@swbell.net</u>>

Subject: [EXTERNAL] Section 106 Proposed Phase 3 Site Expansion Fort Sam Houston National Cemetery

#### Dear Mr. Hooker:

We are in receipt of your letter dated January 16, 2020 regarding the Phase 3 site expansion of Fort Sam Houston National Cemetery. We concur that there is no evidence to date of sites within the expansion area that are eligible for listing on the National Register of Historic Places. The Conservation Society would like to participate as a consulting party in this ongoing federal review.

Many thanks for this opportunity.

Vincent

Vincent L. Michael, PhD Executive Director The Conservation Society of San Antonio 107 King William San Antonio, TX 78204 210-224-6163 www.saconservation.org – Join Now!



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T. Dan Friedkin Chairman-Emeritus Houston

Carter P. Smith Executive Director

4200 SMITH SCHOOL ROAD AUSTIN, TEXAS 78744-3291 512.389.4800

www.tpwd.texas.gov

December 27, 2019

Fernando Fernandez Department of Veterans Affairs Office of Construction and Facility Management 425 I Street, NW, Suite 6W317D Washington, DC 20001

RE: Notice of Intent to Prepare Environmental Assessment for Proposed Phase 3 Site Expansion and Improvement for Fort Sam Houston National Cemetery, San Antonio, Bexar County, Texas

Dear Mr. Fernandez:

This letter is in response to your request for review of the proposed project referenced above. Texas Parks and Wildlife Department (TPWD) has reviewed the information provided and offers the following comments and recommendations.

### **Project Description**

The Department of Veterans Affairs (VA) intends to prepare an Environmental Assessment (EA) for the proposed Phase 3 Expansion and Improvements in Fort Sam Houston National Cemetery in San Antonio, Texas. The proposed project would expand the cemetery facilities by approximately 43 acres, construct new access roads and parking areas as well as repair and/or replace existing features of the existing cemetery.

### **General Recommendations**

**Recommendation:** In general, when preparing an EA, an inventory of existing natural resources should be made of the project area; specific evaluations should be designed to predict project impacts upon these natural resources. To assist in your project planning, a document entitled, Texas Parks and Wildlife Department Suggested Guidelines for Preparation of Environmental Assessment Documents, is attached.

**Recommendation:** During construction, TPWD recommends the judicious use and placement of sediment control fence to exclude wildlife from construction areas. In many cases, sediment control fence placement for the purposes of controlling erosion and protecting water quality can be modified minimally to also provide the benefit of excluding wildlife access to construction areas. The exclusion fence should be buried at least six inches and be at least 24 inches high. The exclusion fence should be maintained for the life of the project and only removed after the construction is completed and the disturbed sites have been revegetated. Construction personnel should be encouraged to examine the inside of the exclusion area daily to determine if any wildlife species have been trapped inside the area of impact and provide safe egress opportunities prior to initiation of proposed excavation activities. When feasible, TPWD recommends

To manage and conserve the natural and cultural resources of Texas and to provide hunting, fishing and outdoor recreation opportunities for the use and enjoyment of present and future generations. Mr. Fernando Fernandez Page 2 December 27, 2019

> that any open trenches or excavation areas be covered overnight and/or inspected every morning to ensure no wildlife species have been trapped. If excavated holes or trenches must be left unfilled and/or uncovered at the end of the work day, they should have escape ramps placed in them (fashioned from boards or soil) at an angle of 45 degrees (1:1).

> **Recommendation:** For soil stabilization and/or revegetation of disturbed areas within the proposed project area, TPWD recommends erosion and seed/mulch stabilization materials that avoid entanglement hazards to snakes and other wildlife species. Because the mesh found in many erosion control blankets or mats pose an entanglement hazard to wildlife, TPWD recommends the use of no-till drilling, hydromulching and/or hydroseeding due to a reduced risk to wildlife. If erosion control blankets or mats will be used, the product should contain no netting or contain loosely woven, natural fiber netting in which the mesh design allows the threads to move, therefore allowing expansion of the mesh openings. Plastic mesh matting should be avoided.

### **Federal Regulations**

### Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) prohibits direct and affirmative purposeful actions that reduce migratory birds, their eggs, or their nests, by killing or capturing, to human control, except when specifically authorized by the Department of the Interior. This protection applies to most native bird species, including ground nesting species.

As proposed, portions of the cemetery expansion would occur in areas described as currently being naturally vegetated. Review of aerial imagery and imagery available online indicates that woody vegetation at the site consists of mesquite, hackberry, chinaberry, oaks and various shrubs and grasses; all suitable nesting, feeding or loafing sites for birds.

**Recommendation:** Although the expansion sites may have been historically disturbed, they currently provide potential habitat for birds. TPWD recommends that any necessary vegetation clearing or soil excavation within the expansion areas or other project sites be scheduled to occur outside of the March 15 through September 15 migratory bird nesting season. Contractors should be made aware of the potential of encountering migratory birds (either nesting or wintering) in the proposed project site and be instructed to avoid negatively impacting them.

If vegetation clearing must be scheduled to occur during the nesting season, TPWD recommends the vegetation to be impacted should be surveyed for active nests by a qualified biologist. Nest surveys should be conducted no more than five days prior to the scheduled clearing to ensure recently constructed nests are identified. If active nests are observed during surveys, TPWD recommends a 150-foot buffer of vegetation remain around the nests until the young have fledged or the nest is abandoned.

Mr. Fernando Fernandez Page 3 December 27, 2019

### State Regulations

#### Parks and Wildlife Code

#### Nongame Birds

State law prohibits any take or possession of nongame birds, including their eggs and nests. Laws and regulations pertaining to state-protection of nongame birds are contained in Chapter 64 of the Texas Parks and Wildlife (TPW) Code; specifically, Section 64.002 provides that no person may catch, kill, injure, pursue, or possess a bird that is not a game bird. TPW Code Section 64.003, regarding destroying nests or eggs, provides that, no person may destroy or take the nests, eggs, or young and any wild game bird, wild bird, or wild fowl. TPW Code Chapter 64 does not allow for incidental take and therefore is more restrictive than the MBTA.

Although not documented in the Texas Natural Diversity Database (TXNDD), many bird species which are not listed as *threatened* or *endangered* are protected by Chapter 64 of the TPW Code and are known to be year-round or seasonal residents or seasonal migrants through the proposed project area.

Within highly developed urban areas, minimally developed areas such as military installations and cemeteries are especially valuable for wildlife as they can provide scattered habitats and interconnecting corridors. As indicated above, the diversity of habitats in the general area is suitable to support a diversity of wildlife species. In particular, the range of habitats provides areas of cover, feeding, nesting and loafing for many species of birds including grassland birds, Neo-tropical migrants, and raptors. Additionally, the project area is in the middle of the Central Migratory Flyway through which millions of birds pass during spring and fall migration.

**Recommendation:** Please review the *Federal Regulations: Migratory Bird Treaty Act* section above for recommendations as they are applicable for Chapter 64 of the Parks and Wildlife Code compliance.

### State-listed species

State law prohibits the capture, trap, take or kill (incidental or otherwise) of state-listed species. Laws and regulations pertaining to state-listed endangered or threatened animals are contained in Chapters 67 and 68 of the Texas Parks and Wildlife (TPW) Code; laws pertaining to endangered or threatened plants are contained in Chapter 88 of the TPW Code. There are penalties, which may include fines and/or jail time in addition to payment of restitution values, associated with take of state-listed species. A copy of *TPWD Guidelines for Protection of State-Listed Species*, which includes a list of penalties for take of species, can be found on the TPWD website.

For purposes of relocation, surveys, monitoring, and research, terrestrial state-listed species may only be handled by persons permitted through the TPWD Wildlife Permits

Mr. Fernando Fernandez Page 4 December 27, 2019

Program. For more information regarding Wildlife Permits, please contact the Wildlife Permits Office at (512) 389-4647.

The potential occurrence of state-listed species in the project area is primarily dependent upon the availability of suitable habitat. Direct impacts to high quality or suitable habitat therefore are directly proportional to the magnitude and potential to directly impact state-listed species. State-listed reptiles that are typically slow moving or unable to move due to cool temperatures are especially susceptible to being directly impacted during vegetation clearing or developing machinery access corridors.

Please be aware that determining the actual presence of a species in a given area depends on many variables including daily and seasonal activity cycles, environmental activity cues, preferred habitat, transiency and population density (both wildlife and human). The absence of a species can be demonstrated only with great difficulty and then only with repeated negative observations, taking into account all the variable factors contributing to the lack of detectable presence.

**Recommendation:** TPWD recommends reviewing the most current TPWD annotated county list of rare species for Bexar County, as state-listed species could be present depending upon habitat availability. This list is available online at the TPWD Wildlife Diversity website.

### Species of Concern/Important Species

In addition to state- and federally-protected species, TPWD tracks special features, natural communities, and rare species that are not listed as threatened or endangered. These species and communities are tracked in the TXNDD, and TPWD actively promotes their conservation. TPWD considers it important to evaluate and, if necessary, minimize impacts to rare species and their habitat to reduce the likelihood of endangerment and preclude the need to list as threatened or endangered in the future.

Review of the TXNDD indicates that both the eastern and western spotted skunks (*Spilogale putorius* and *S. gracilis*, respectively) have been documented in the general area of the project. Both of these species are Species of Greatest Conservation Need (SGCN). Both species occupy a variety of habitats and often occur in close association with urban environments. They are often found in association with brush-lined streams (e.g., Salado Creek riparian corridor in the project area), in attics, under buildings, and may den in rock fences.

**Recommendation:** TPWD recommends taking precautions to avoid impact to SGCN fauna if encountered during construction and maintenance activities. Wildlife encountered during construction should be allowed to safely leave the premises.

Mr. Fernando Fernandez Page 5 December 27, 2019

### Post-construction landscaping plans

As minimally developed areas, cemeteries can provide important wildlife habitat in urban areas. Some of the areas proposed for expansion in the cemetery appear to currently consist of trees and shrubs.

**Recommendation:** TPWD recommend designing the layout of the cemetery expansion areas to preserve stands of mature native trees, if possible.

Furthermore, TPWD recommends incorporating native trees, shrubs and grasses in landscaping plans. The use of native plants that are best adapted to the local area minimizes the amount of water and fertilizers required for maintenance. In addition to being aesthetically pleasing, the use of native flowering shrubs and trees also provide a food source that may attract wildlife and aid in creating an environment that is beneficial to visitors.

I appreciate the opportunity to review and provide comments on this project. Please contact me at (361) 825-3240 or **russell.hooten@tpwd.texas.gov** if you have any questions concerning our comments.

Sincerely,

Russellt

Russell Hooten Wildlife Habitat Assessment Program Wildlife Division

/rh 42876

Attachment



### DEPARTMENT OF VETERANS AFFAIRS

OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT WASHINGTON DC 20420

May 15, 2020

Jacob Ogdee USFWS Biologist USFWS Southwest Regional Office 500 Gold Ave. SW Albuquerque, NM 87102

### Subject: Proposed Phase 3 Site Expansion of Fort Sam Houston National Cemetery 1520 Harry Wurzbach Rd, San Antonio, Bexar County, Texas 78209

To Mr. Ogdee,

The U.S. Department of Veteran Affairs (VA) is preparing environmental documentation for the proposed Phase 3 Expansion and Improvements project (Project) within the existing Fort Sam Houston National Cemetery (FSHNC) located at 1520 Harry Wurzbach Road, San Antonio, Bexar County, Texas, adjacent to Fort Sam Houston Joint Base San Antonio.

Due to gravesite depletion, FSHNC requires additional burial capacity to serve veterans in the south-central Texas region. The purpose of the Project is to continue to enable the VA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs of the region for the next 15 years. The proposed Project sets out to repair and construct resources across the cemetery and expand cemetery facilities by approximately 43 acres on the eastern side of the property which were previously disturbed by US Army operations and currently undeveloped and vegetated. This project represents a continuation of a planned and anticipated multi-phase cemetery build out and no new property would need to be acquired. The Project will include 30,013 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre- placed crypt full casket sites. Additional improvements include repairs to existing columbaria, continuing repairs to the perimeter stone wall, restoration of the rostrum, correct infrastructure deficiencies, extend the irrigation system, construct three buildings including the new honor guard building, a vehicle storage, and a material storage; expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking. Previously, the VA completed an Environmental Assessment (EA) during site selection in 1994, resulting in a Finding of No Significant Impact (FONSI).

The land being used for the cemetery expansion is VA owned and historically used as US Army training grounds. Much of the property is currently managed as cemetery grounds, with some upland hardwood forests and shrub scrub lands. Cultural Resource Assessments and a Wetland Delineation have been completed on the site. Four wetlands were found on the west side of the site totaling 7.89 acres.

Information for Planning and Consultation (IPaC) produced a species list which was then reviewed against the Environmental Conservation Online System (ECOS) to determine if species ranges fall within the project area. The species listed in Table 1 were identified by IPaC.

### **TABLE 1. IPAC Identified Species**

Birds		
Golden Cheeked Warbler	Endangered	Potential for impacts; however,
Dendroica chrysoparia		preferred habitat in central Texas is
		geographically separate from the
		metro area in which the proposed
		project is located

	1	
Least Tern	Endangered	Unlikely to impact; as this species
Sterna antillarum		only needs to be considered for
		wind energy projects
Piping Plover	Threatened	Unlikely to impact; as this species
Charadrius melodus		only needs to be considered for
		wind energy projects
Red Knot	Threatened	Unlikely to impact; as this species
Calidris canutus rufa		only needs to be considered for
		wind energy projects
Whooping Crane	Endangered	Unlikely to impact; Texas habitat
Grus americana		consists of salt marshes on coastal
		plains outside of metro areas
		where the project is located
	Amphibians	
San Marcos Salamander	Threatened	Unlikely to impact; range does not
Eurycea nana		include project area
Texas Blind Salamander	Endangered	Unlikely to impact; range does not
Typhlomolge rathbuni	_	include project area
	Fishes	
Fountain Darter	Endangered	Unlikely to impact: range does not
Etheostoma fonticola	Linualigereu	include project area
Lineostoma jonticola		
	Clams	
Texas Fatmucket	Candidate	Unlikely to impact; range does not
Lampsilis bracteata		include project area
Texas Pimpleback	Candidate	Unlikely to impact; range does not
Quadrula petrina		include project area
	Insects	
[no Common Name] Beetle	Endangered	Unlikely to impact; project area is
Rhadine exilis		not within a karst zone and does
		not contain karst habitat critical to
		the species
[no Common Name] Beetle	Endangered	Unlikely to impact; project area is
Rhadine infernalis		not within a karst zone and does
		not contain karst habitat critical to
		the species
Comal Springs Dryopid	Endangered	Unlikely to impact; range does not
Beetle		include project area
Stygoparnus comalensis		
Comal Springs Riffle Beetle	Endangered	Unlikely to impact; range does not
Heterelmis comalensis		include project area
Helotes Mold Beetle	Endangered	Unlikely to impact; project area is
Batrisodes venyivi		not within a karst zone and does
		not contain karst habitat critical to
		the species

Arachnids		
Braken Bat Cave	Endangered	Unlikely to impact; project area is
Meshweaver		not within a karst zone and does
Cicurina venii		not contain karst habitat critical to
		the species
Cokendolpher Cave	Endangered	Unlikely to impact; project area is
Harvestman		not within a karst zone and does

Texella cokendolpheri		not contain karst habitat critical to
		the species
Government Canyon Bat Cave	Endangered	Unlikely to impact; project area is
Meshweaver		not within a karst zone and does
Cicurina vespera		not contain karst habitat critical to
		the species
Government Canyon Bat	Endangered	Unlikely to impact; project area is
Cave Spider		not within a karst zone and does
Neoleptoneta microps		not contain karst habitat critical to
		the species
Madla Cave Meshweaver	Endangered	Unlikely to impact; project area is
Cicurina madla		not within a karst zone and does
		not contain karst habitat critical to
		the species
Robber Baron Cave	Endangered	Unlikely to impact; project area is
Meshweaver		not within a karst zone and does
Cicurina baronia		not contain karst habitat critical to
		the species

Crustaceans			
Peck's Cave Amphipod	Endangered	Unlikely to impact; range does not	
Stygobromus (=Stygonectes)		include project area	
pecki			

	Flowering Plants	
Bracted Twistflower	Candidate	Unlikely to impact; habitat consists
Streptanthus bracteatus		of rocky hillsides and slopes not
		present in project area
Texas Wild-rice	Endangered	Unlikely to impact; proposed
Zizania texana		cemetery expansion will not impact
		stream and BMP's will be used to
		minimize runoff

There are two migratory bird species listed as well; Harris's sparrow (*Zonotrichia querula*) and lesser yellowlegs (*Tringa flavipes*). Both of these species breed elsewhere and are unlikely to be impacted by the proposed project.

There are no critical habitats listed within the project area. A review of the Bexar County Karst zone mapper shows the project area falls outside of any karst zones. BMPs will be followed to limit work during nesting seasons for bald and golden eagles as well as limit any impacts to the other species listed above. No critical habitat or listed species were observed during field reconnaissance efforts.

For these reasons, the VA concludes that the proposed cemetery expansion project is **not likely to adversely affect** federally protected species. We request your concurrence with our determinations. If you have any comments or require any additional information in order to concur with this finding, please contact Fernando L. Fernández at 202-632-5529 or <u>Fernando.Fernandez@va.gov.</u>

Sincerely,

Fernando L. Fernández Environmental Engineer

Encl: Figure A: Project Overview Map IPaC Review



### Fort Sam Houston National Cemetery Bexar County, TX

## Figure A Project Overview



#### Project Area West Actions:

- 1. Rehab existing roads
- 2. Repair/replace stone perimeter wall
- 3. Remodel interior of Public Information Center (PIC)
- 4. Expand parking area for PIC (14 stalls)
- 5. New Honor Guard building (1,238 s.f.)
- 6. Repair Rostrum and concrete walk

#### Project Area East Actions:

- 1. New Equipment Storage building (2,320 s.f.)
- 2. New Material Storage building (800 s.f.)
- 3. Administration building expansion (2,792 s.f.)
- 4. New access road
- 5. New Columbaria
- 6. New Gravesite area with roads



SOURCE: TxDNR, USDA, ESRI, TIGER, Bing, Bexar Co., Anderson Engineering



# United States Department of the Interior

FISH AND WILDLIFE SERVICE Austin Ecological Services Field Office 10711 Burnet Road, Suite 200 Austin, TX 78758-4460 Phone: (512) 490-0057 Fax: (512) 490-0974 <u>http://www.fws.gov/southwest/es/AustinTexas/</u> http://www.fws.gov/southwest/es/EndangeredSpecies/lists/



February 17, 2020

In Reply Refer To: Consultation Code: 02ETAU00-2020-SLI-0119 Event Code: 02ETAU00-2020-E-01677 Project Name: Fort Sam Houston National Cemetery

Subject: Updated list of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

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

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

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

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or endangered species and to determine whether projects may affect these species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

While a Federal agency may designate a non-Federal representative to conduct informal consultation or prepare a biological assessment, the Federal Agency must notify the Service in writing of any such designation. The Federal agency shall also independently review and evaluate the scope and content of a biological assessment prepared by their designated non-Federal representative before that document is submitted to the Service.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by a federally funded, permitted or authorized activity, the agency is required to consult with the Service pursuant to 50 CFR 402. The following definitions are provided to assist you in reaching a determination:

- *No effect* the proposed action will not affect federally listed species or critical habitat. A "no effect" determination does not require section 7 consultation and no coordination or contact with the Service is necessary. However, if the project changes or additional information on the distribution of listed or proposed species becomes available, the project should be reanalyzed for effects not previously considered.
- May affect, but is not likely to adversely affect the project may affect listed species and/or critical habitat; however, the effects are expected to be discountable, insignificant, or completely beneficial. Certain avoidance and minimization measures may need to be implemented in order to reach this level of effect. The Federal agency or the designated non-Federal representative should consult with the Service to seek written concurrence that adverse effects are not likely. Be sure to include all of the information and documentation used to reach your decision with your request for concurrence. The Service must have this documentation before issuing a concurrence.
- *Is likely to adversely affect* adverse effects to listed species may occur as a direct or indirect result of the proposed action. For this determination, the effect of the action is neither discountable nor insignificant. If the overall effect of the proposed action is beneficial to the listed species but the action is also likely to cause some adverse effects to individuals of that species, then the proposed action "is likely to adversely affect" the listed species. The analysis should consider all interrelated and interdependent actions. An "is likely to adversely affect" determination requires the Federal action agency to initiate formal section 7 consultation with our office.

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Regardless of the determination, the Service recommends that the Federal agency maintain a complete record of the evaluation, including steps leading to the determination of effect, the qualified personnel conducting the evaluation, habitat conditions, site photographs, and any other related information. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at: <u>http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF</u>.

### Migratory Birds

For projects that may affect migratory birds, the Migratory Bird Treaty Act (MBTA) implements various treaties and conventions for the protection of these species. Under the MBTA, taking, killing, or possessing migratory birds is unlawful. Migratory birds may nest in trees, brushy areas, or other areas of suitable habitat. The Service recommends activities requiring vegetation removal or disturbance avoid the peak nesting period of March through August to avoid destruction of individuals, nests, or eggs. If project activities must be conducted during this time, we recommend surveying for nests prior to conducting work. If a nest is found, and if possible, the Service recommends a buffer of vegetation remain around the nest until the young have fledged or the nest is abandoned.

For additional information concerning the MBTA and recommendations to reduce impacts to migratory birds please contact the U.S. Fish and Wildlife Service Migratory Birds Office, 500 Gold Ave. SW, Albuquerque, NM 87102. A list of migratory birds may be viewed at <a href="https://www.fws.gov/birds/management/managed-species/migratory-bird-treaty-act-protected-species.php">https://www.fws.gov/birds/management/managed-species/migratory-bird-treaty-act-protected-species.php</a>. Guidance for minimizing impacts to migratory birds for projects including communications towers can be found at: <a href="https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/guidance-documents/communication-towers.php">https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/guidance-documents/communication-towers.php</a>. Additionally, wind energy projects should follow the wind energy guidelines

<u>https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/guidance-documents/wind-energy.php</u> ) for minimizing impacts to migratory birds and bats.

Finally, please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan <u>https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/guidance-documents/eagles.php</u>.

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

Attachment(s):

Official Species List

# **Official Species List**

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

This species list is provided by:

### **Austin Ecological Services Field Office**

10711 Burnet Road, Suite 200 Austin, TX 78758-4460 (512) 490-0057

# **Project Summary**

Consultation Code:	02ETAU00-2020-SLI-0119
Event Code:	02ETAU00-2020-E-01677
Project Name:	Fort Sam Houston National Cemetery
Project Type:	DEVELOPMENT

Project Description: planned expansion of National Cemetery

### Project Location:

Approximate location of the project can be viewed in Google Maps: <u>https://www.google.com/maps/place/29.474397229018734N98.41743355621495W</u>



Counties: Bexar, TX

# **Endangered Species Act Species**

There is a total of 24 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 3 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

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

1. <u>NOAA Fisheries</u>, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Endangered

### **Birds**

NAME	STATUS
Golden-cheeked Warbler (=wood) <i>Dendroica chrysoparia</i> No critical habitat has been designated for this species.	Endangered
Species profile: https://ecos.fws.gov/ecp/species/33	
Least Tern Sterna antillarum	Endangered
Population: interior pop.	_
No critical habitat has been designated for this species.	
<ul><li>This species only needs to be considered under the following conditions:</li><li>Wind Energy Projects</li></ul>	
Species profile: <u>https://ecos.fws.gov/ecp/species/8505</u>	
Piping Plover Charadrius melodus	Threatened
Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except	
those areas where listed as endangered.	
There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat.	
<ul><li>This species only needs to be considered under the following conditions:</li><li>Wind Energy Projects</li></ul>	
Species profile: <u>https://ecos.fws.gov/ecp/species/6039</u>	
Red Knot <i>Calidris canutus rufa</i>	Threatened
No critical habitat has been designated for this species.	
This species only needs to be considered under the following conditions:	
<ul> <li>Wind Energy Projects</li> </ul>	
Species profile: <u>https://ecos.fws.gov/ecp/species/1864</u>	
Whooping Crane Grus americana	Endangered
Population: Wherever found, except where listed as an experimental population	
There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat.	
Species profile: <u>https://ecos.fws.gov/ecp/species/758</u>	
Amphibians	
Amphibians	
NAME	STATUS
San Marcos Salamander <i>Eurycea nana</i>	Threatened
There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/6374</u>	

Texas Blind Salamander *Typhlomolge rathbuni* No critical habitat has been designated for this species. Species profile: <u>https://ecos.fws.gov/ecp/species/5130</u>

# Fishes

NAME	STATUS
Fountain Darter <i>Etheostoma fonticola</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/5858</u>	Endangered
Clams	
NAME	STATUS
Texas Fatmucket Lampsilis bracteata No critical habitat has been designated for this species. Species profile: <u>https://ecos.fws.gov/ecp/species/9041</u>	Candidate
Texas Pimpleback <i>Quadrula petrina</i> No critical habitat has been designated for this species. Species profile: <u>https://ecos.fws.gov/ecp/species/8966</u>	Candidate
Insects	
NAME	STATUS
[no Common Name] Beetle <i>Rhadine exilis</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/6942</u>	Endangered
[no Common Name] Beetle <i>Rhadine infernalis</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/3804</u>	Endangered
Comal Springs Dryopid Beetle <i>Stygoparnus comalensis</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/7175</u>	Endangered
Comal Springs Riffle Beetle <i>Heterelmis comalensis</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/3403</u>	Endangered
Helotes Mold Beetle <i>Batrisodes venyivi</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/1149</u>	Endangered

# Arachnids

NAME	STATUS
Braken Bat Cave Meshweaver <i>Cicurina venii</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/7900</u>	Endangered
Cokendolpher Cave Harvestman <i>Texella cokendolpheri</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/676</u>	Endangered
Government Canyon Bat Cave Meshweaver <i>Cicurina vespera</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/7037</u>	Endangered
Government Canyon Bat Cave Spider <i>Neoleptoneta microps</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/553</u>	Endangered
Madla Cave Meshweaver <i>Cicurina madla</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/2467</u>	Endangered
Robber Baron Cave Meshweaver <i>Cicurina baronia</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/2361</u>	Endangered
Crustaceans	
NAME	STATUS

NAME	STATUS
Peck's Cave Amphipod <i>Stygobromus</i> (= <i>Stygonectes</i> ) pecki	Endangered
There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat.	
Species profile: <u>https://ecos.fws.gov/ecp/species/8575</u>	

# **Flowering Plants**

NAME	STATUS
Bracted Twistflower Streptanthus bracteatus	Candidate
No critical habitat has been designated for this species.	
Species profile: <u>https://ecos.fws.gov/ecp/species/2856</u>	
Texas Wild-rice Zizania texana	Endangered
There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat.	
Species profile: <u>https://ecos.fws.gov/ecp/species/805</u>	

# **Critical habitats**

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

Wetlands and Waters of the U.S. Delineation and Report for Department of Veterans Affairs Ft. Sam Houston National Cemetery Phase III Expansion and Improvements Project, San Antonio, Texas



Prepared for Anderson Engineering by: DESERT CONCEPTS ENERGY & ENVIRONMENTAL, INC and AmaTerra Environmental, Inc. on behalf of RCK Environmental Services San Antonio, TX



May 22, 2020

### **ACKNOWLEDGEMENTS**

### Anderson Engineering contracted this study with

**RCK Environmental Services, LLC** 

Robert Kull, Owner 19179 Blanco Road, PMB 260 San Antonio, Texas 78258

and a contractor team comprised of:

Desert Concepts Energy & Environmental Inc. Darren Knight, PG, CQM, VP 18102 Talavera Ridge, #2416 San Antonio, TX 78257

and

Joshua Zatopek, Environmental Specialist AmaTerra Environmental, Inc. 11842 Rim Rock Trail Austin, TX 78737

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Appendix A – Figures
Appendix B – Wetland Determination Data Forms
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## Wetland Assessment and Delineation

### Introduction

As part of the on-going Veterans Affairs (VA) Phase III Expansion of the Fort Sam Houston National Cemetery in San Antonio, Bexar County, Texas, a wetland and waters of the U.S. (WOTUS) delineation was conducted in the proposed VA's owned property for building a new access road. The 1,070-ft planned access road will allow alternative access to newer sections and planned Phase III and future Phase IV expansion areas of the Fort Sam Houston National Cemetery (Figure 1 in Appendix A). The Survey was conducted to determine if any WOTUS is present within the boundaries of the access road and to determine any impacts of WOTUS from construction activities associated with the access road.

On 06 May 2020, AmaTerra Environmental, Inc.'s (AmaTerra) wetland biologist Joshua Zatopek performed a field investigation of the 3.75-acre access road. The field investigation focused on evaluating water bodies within the access road to determine whether they fall under the jurisdiction of Section 404 of the Clean Water Act (CWA) and the Navigable Waters Protection Rule, and to delineate any wetlands encountered in accordance with the U.S. Army Corps of Engineers (USACE) Wetland Delineation Manual of 1987 and the Great Plains Regional Supplement to the manual.

### Geological and Ecological Setting

The subject access road is located within a wooded area north of the Fort Sam Houston National Cemetery and south of James Park located northwest of downtown San Antonio in Bexar County, Texas (Figures 2 and 3 in Appendix A). The access road is surrounded by Fort Sam Houston and is located near Salado Creek.

According to the San Antonio Sheet of the Geologic Atlas of Texas, the surface geology around the subject property occurs on Fluviatile terrace deposits (Brown et al., 1983). Fluviatile terrace deposits consist of light-brown, reddish-brown, gray, or yellowish-brown, gravelly quartz and lithic sand and silt to sandy gravel (United States Geological Service, 2020).

According to the United States Department of Agriculture- National Resources Conservation Service's (NRCS) Web Soil Survey, the access road consists of Sunev clay loam, 0 to 1 percent slopes (Figure 4 in Appendix A). The Sunev series consists of very deep, well drained soils that formed in loamy alluvium and occurs on nearly level to moderately steep stream terraces or foot slopes of valleys and ridges. According to the National List of Hydric Soils maintained by the NRCS (2020), the Sunev clay loam, 0 to 1 percent slopes soil series is not listed as a hydric soil in Bexar County.

The United States Fish and Wildlife Service's (USFWS) National Wetlands Inventory (NWI) has mapped one waterbody near the access road, a freshwater pond habitat measuring 0.2 acres
(Figure 5 in Appendix A). According to the NWI, this palustrine feature has an unconsolidated bottom and is permanently flooded and diked or impounded. This feature is located outside of the access road's boundary.

Flood hazard areas identified on the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps (FIRM) are identified as a Special Flood Hazard Area (SFHA). SFHA is defined as the area that will be inundated by the flood event having a one percent chance of being equaled or exceeded in any given year. The one percent annual chance flood is also referred to as the base flood or 100-year flood. SFHAs are labeled as Zone A, Zone AO, Zone AH, Zones A1-A30, Zone AE, Zone A99, Zone AR, Zone AR/AE, Zone AR/AO, Zone AR/A1-A30, Zone AR/A, Zone V, Zone VE, and Zones V1-V30. Moderate flood hazard areas, labeled Zone B or Zone X are areas between the limits of the base flood and the 0.2-percent-annual-chance (or 500-year) flood. On FIRM number 48029C0410G, the majority of the access road occurs in a floodway designated as Zone AE (Figure 6 in Appendix A), a SFHA subject to inundation by the one-percent annual chance flood event determined by detailed methods. Mandatory flood insurance purchase requirements and floodplain management standards apply. The remaining area of the access road occurs in Zone X, an area of minimal flooding.

WOTUS include navigable waters and may include other parts of the surface water tributary system down to the smallest streams (e.g., tributaries that contain water only after a rain event), lakes, ponds, or other water bodies on those streams, and adjacent wetlands (e.g. sloughs, swamps, and some seasonally flooded areas) if they meet certain criteria. Isolated waters such as playa lakes, prairie potholes, old river scars, cutoff sloughs, and abandoned construction and mining pits may also be WOTUS if they meet certain criteria. WOTUS includes areas that are manmade, or man-induced, as well as natural. Activities that occur in WOTUS that require a permit from the USACE include, but are not limited to, shoreline and bank stabilization; boat ramps; roads; residential and commercial developments; utilities; flood control facilities; mining; oil, gas and water wells; and in some cases, dredging and other excavation. Based on these observations, it does not appear that there are any jurisdictional WOTUS within the access road boundary.

Tree and shrub species in the western portion of the access road was entirely dominated by sugarberry (*Celtis laevigata*), Chinaberry (*Melia azedarach*), and Japanese ligustrum (*Ligustrum japonicum*). Little to no herbaceous vegetation existed in the area due to the leaf litter from the Japanese ligustrum. The central portion of the access road consisted of Edward's plateau vegetation dominated by honey mesquite (*Prosopis glandulosa*), sugarberry, and Texas persimmon (*Diospyros texana*). Other vegetation observed included cedar elm (*Ulmus crassifolia*), cactus (*Opuntia spp.*) whitebrush (*Aloysia gratissima*), stretchberry (*Forestiera pubescens*), and Canada wildrye (*Elymus candensis*). The eastern portion of the access road was dominated by sugarberry, cedar elm, huisache (*Vacehllia farnesiana*), and Japanese ligustrum. Other species observed included pecan (*Carya illinoinensis*), Texas live oak (*Quercus fusiformis*),

Chinaberry, stretchberry, Canada wildrye, and great ragweed (Ambrosia trifida).

## Methodology

On 06 May 2020, AmaTerra's wetland biologist Joshua Zatopek performed a field investigation of the subject property. The investigator examined the entire access road for hydrological features that could be considered a jurisdictional WOTUS. GPS points were taken with a Trimble Geo 7X unit and wetland determination data forms were completed where appropriate to document locations and conditions of potential WOTUS, including wetlands. The wetland delineation was conducted coincidingly with a significant and heritage tree survey, so the access road was surveyed for WOTUS in short transects. Wetland Determination Data Forms can be viewed in Appendix B and Photographs from the field investigation can be viewed in Appendix C.

The investigator started on the eastern end of the access road and conducted short transects aligning north to south. The eastern end of the access road appeared at one time to be bladed due to push piles and scattered rubble such as bricks. The investigator came upon a small drainage feature in a northwest to southeast alignment. The investigator walked the entire length of the feature within the access road and did not discover any Ordinary High Water Marks (OHWMs) such as bed and bank. The drainage channel was in a broad "U" shape measuring approximately two to three feet wide and towards the southern boundary of the access road, the drainage was approximately ten feet wide. No water was present in the drainage. The investigator determined that this feature was ephemeral, flowing water is only present during and for a short duration after precipitation events in a typical year. The drainage was lined with sugarberry and Japanese ligustrum and great ragweed dominated the drainage where it was wider. A wetland determination data point was taken within the narrower portion of the drainage (Data Point 1) and another point was taken in the wider portion of the drainage where the great ragweed existed (Data Point 2). Although surface cracks and a drainage pattern were observed within the feature at Data Points 1 and 2, no hydric soils were present at either location. Data Point 2 exhibited hydric vegetation while Data Point 1 did not. As such, the drainage feature was not considered a wetland since it did not meet all three parameters of a wetland defined by the USACE.

The investigator then continued the north to south transects and moved west to search for more hydrological features. In the central portion of the access road, the investigator discovered a smaller drainage feature in a northeast to southwest alignment. The investigator walked the length of the drainage and determined that it did not have any OHWM features and was also dry. This feature had a "U" shaped channel that was approximately one foot wide and some rocks were present in the feature. The drainage was determined to be ephemeral. The drainage feature was lined with honey mesquite, sugarberry, cedar elm, and stretchberry.

The investigator continued west and did not discover any more hydrological features. The

investigator then went to visit the NWI indicated pond north of the access road. The pond was discovered to be dry. The pond is outside of the access road's boundary and therefore was not recorded.

The two ephemeral drainage features and data point locations can be viewed on Figure 7 in Appendix A.

#### Results

Both ephemeral drainage features were determined to be non-jurisdictional under Section 404 of the CWA due to the lack of OHWMs and the lack of connectivity with any traditionally navigable waterways. The drainage features were also considered under The Navigable Waters Protect Rule, which is proposed to become in effect on 22 June 2020. The two drainage features were determined to be non-jurisdictional under this rule due to the drainages being ephemeral. No wetlands were observed within the access road. The eastern drainage feature measured approximately 250 feet and the western drainage feature measured approximately 70 feet.

### Summary and Permitting Recommendations

Since the drainage features were determined not to be jurisdictional WOTUS, no Section 404 of the CWA permit from the USACE would be needed. It is recommended that the use of Best Management Practices be utilized during the construction of the access road to avoid erosional issues and discharges in a WOTUS.

The professional opinion offered in this report is based on best professional judgment. It should be noted that the USACE makes the final determination on the location of waterbody and wetland boundaries and their jurisdictional status.

#### Literature Cited

- Brown, T. E., Waechter, N. B. Rose, P. R., and Banes, V.E., 1983, Geologic Atlas of Texas, San Antonio Sheet: The University of Texas at Austin, Bureau of Economic Geology, Geologic Atlas of Texas, map scale 1:250,000.
- Correll, D. S. and M. C. Johnston. 1970. Manual of the vascular plants of Texas. Texas Research Foundation, Renner. 1881 pp.
- Natural Resources Conservation Service, United States Department of Agriculture. Web Soil Survey. http://websoilsurvey.nrcs.usda.gov/. Accessed [5/12/2020].
- United States Geological Service, Mineral Resources On-Line Spatial Data. https://mrdata. usgs.gov/geology/state/sgmc-unit.php?unit=TXQt%3B0. Accessed [5/12/2020].

Wetland Delineation, Ft. Sam Houston National VA Cemetery, San Antonio, Texas

Appendix A: Figures



Figure 1. Location map of the VA access easement in Bexar County, Texas.



Figure 2. Aerial photograph of the VA access easement.



Figure 3. Topographic map of the VA access easement.



Figure 4. Soils in the project area.



Figure 5. National Wetland Inventory mapped features in the project area.



Figure 6. FEMA-mapped flood zones in the project area.



Figure 7. Non-jurisdictional ephemeral drainages, data points, and areas examined during the field investigation.

Appendix B: Resource Data Forms

# WETLAND DETERMINATION DATA FORM – Great Plains Region

Project/Site: VA Access Easement at Fi	t. Sam Houston Nati	onal Cemetery	City/County	: San Anto	onio/Bexar	Sampling Date: 0	6 May 2020
Applicant/Owner: <u>Veterans Affairs</u>					State: TX	Sampling Point:	Data Point 1
Investigator(s): <u>Joshua Zatopek- Ar</u>	naTerra Environme	ental, Inc.	Section, To	wnship, Ra	nge:		
Landform (hillslope, terrace, etc.): <u>Str</u>	eam terraces		Local relief	(concave,	convex, none): <u>Concave</u>	Slop	e (%): <u>0-1</u>
Subregion (LRR): <u>LRR I</u>		Lat: <u>29.</u> 4	7863°N		_ Long: <u>-98.41482°W</u>	Datum	n: NAD 83
Soil Map Unit Name: <u>Sunev clay loa</u> ı	m, 0 to 1 percent s	lopes			NWI classific	ation: <u>None</u>	
Are climatic / hydrologic conditions on	the site typical for	this time of yea	ar? Yes <u>X</u>	No	(If no, explain in R	emarks.)	
Are Vegetation, Soil, o	r Hydrology	_significantly of	disturbed?	Are '	'Normal Circumstances" p	present? Yes X	No
Are Vegetation, Soil, o	r Hydrology	naturally pro	blematic?	(lf ne	eded, explain any answe	rs in Remarks.)	
SUMMARY OF FINDINGS -	Attach site ma	p showing	samplin	g point l	ocations, transects	, important fea	tures, etc.
Hydrophytic Vegetation Present?	Yes	No X	1. 4		<b>A</b>		
Hydric Soil Present?	Yes	No X	IS th	ie Sampleo in a Wotlay	Area	No X	
Wetland Hydrology Present?	Yes X	No	with				
Data point was take		ants.					
		Absolute	Dominant	Indicator	Dominance Test work	sheet.	
Tree Stratum (Plot size: <u>30'</u>	)	% Cover	Species?	Status	Number of Dominant S	pecies	
1. <u>Celtis laevigata</u>		75	Y	FAC	That Are OBL, FACW,	or FAC	
2. Ligustrum japonicum		25	<u>Y</u>	UPL	(excluding FAC-):	2	(A)
3					Total Number of Domin	ant	
4				<u> </u>	Species Across All Stra	ita: <u>4</u>	(B)
Sapling/Shrub Stratum (Plot size: _	15')	100	= Total Cov	/er	Percent of Dominant S That Are OBL, FACW,	or FAC: 50%	(A/B)
1. <u>Celtis laevigata</u>		10	Υ	FAC	Prevalence Index wor	ksheet:	
2					Total % Cover of:	Multiply	bv:
3				·	OBL species	x 1 =	<u> </u>
4					FACW species	x 2 =	
5					FAC species	x 3 =	
Herb Stratum (Plot size: 5'	)			/er	FACU species	x 4 =	
1. Elymus canadensis	,	5	Y	FACU	UPL species	x 5 =	
2					Column Totals:	(A)	(B)
3					Desvelance index		
4					Hydrophytic Vogotatie	= D/A =	
5					1 - Rapid Test for h	Judrophytic Vegeta	tion
6					2 - Dominance Tes	t is >50%	
7					3 - Prevalence Inde	$ex is < 3.0^{1}$	
8				·	4 - Morphological A	Adaptations <sup>1</sup> (Provic	le supporting
9					data in Remark	s or on a separate s	sheet)
10					Problematic Hydro	phytic Vegetation <sup>1</sup> (	Explain)
<u>Woody Vine Stratum</u> (Plot size: <u>30</u> 1	)')	_5	= Total Cov	/er	<sup>1</sup> Indicators of hydric soi be present, unless dist	l and wetland hydro urbed or problemati	ology must c.
2			= Total Cov	/er	Hydrophytic Vegetation Prosont2	s No Y	
% Bare Ground in Herb Stratum 95					Present? Ye	sNO	
Remarks:							

SOIL	SOIL
------	------

Profile Desc	cription: (Describe to	the depth nee	eded to docum	nent the ir	ndicator	or confirm	the absence of ind	icators.)	
Depth	Matrix		Redo	x Features	3				
(inches)	Color (moist)	<u>%</u> Co	olor (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>	Texture	Remarks	
0-6	10YR 3/1	100					Clay loam		
6-16	10YR 3/2	100		·			<u>Clay</u>		
·				·					
					·				
1				·					
Type: C=C	oncentration, D=Deple	tion, RM=Redu	ced Matrix, CS	S=Covered	or Coate	d Sand Gr	ains. <sup>2</sup> Location:	PL=Pore Lining, M=N	/latrix. ile <sup>3</sup> :
Histosol Histic E Black H Hydroge Stratified 1 cm Mu	l (A1) pipedon (A2) istic (A3) en Sulfide (A4) d Layers (A5) ( <b>LRR F</b> ) uck (A9) ( <b>LRR F, G, H</b> )		Sandy C Sandy F Stripped Loamy I Loamy C Deplete	Gleyed Mai Redox (S5) d Matrix (S Mucky Min Gleyed Ma d Matrix (F	trix (S4) ) 6) eral (F1) ttrix (F2)		1 cm Muck (A Coast Prairie Dark Surface High Plains D (LRR H ou Reduced Ver	<ul> <li>A9) (LRR I, J)</li> <li>Redox (A16) (LRR F, (S7) (LRR G)</li> <li>Depressions (F16)</li> <li>Distide of MLRA 72 &amp; tic (F18)</li> </ul>	G, H) 73)
Deplete Thick D	d Below Dark Surface ark Surface (A12)	(A11)	Redox [ Deplete	Dark Surfa d Dark Sui	ce (F6) rface (F7)		Red Parent M Very Shallow	laterial (TF2) Dark Surface (TF12)	
Sandy M 2.5 cm I	Mucky Mineral (S1) Mucky Peat or Peat (S2	2) ( <b>LRR G, H</b> )	Redox [ High Pla	Depressior ains Depre	ns (F8) ssions (F	16)	Other (Explai <sup>3</sup> Indicators of hydi	n in Remarks) rophytic vegetation an	d
5 cm Mu	ucky Peat or Peat (S3)	(LRR F)	(ML	RA 72 & 7	3 of LRR	H)	wetland hydro unless disturb	logy must be present bed or problematic.	,
Restrictive	Layer (if present):								
Туре:									
Depth (in	ches):						Hydric Soil Prese	nt? Yes	No <u>X</u>
Remarks:									
HYDROLO	GY								
Wetland Hy	drology Indicators:								

Primary Indicators (minimum of one required; ch	eck all that apply)	Secondary Indicators (minimum of two required)
Surface Water (A1)	Salt Crust (B11)	X_ Surface Soil Cracks (B6)
High Water Table (A2)	Aquatic Invertebrates (B13)	Sparsely Vegetated Concave Surface (B8)
Saturation (A3)	Hydrogen Sulfide Odor (C1)	<u> </u>
Water Marks (B1)	Dry-Season Water Table (C2)	Oxidized Rhizospheres on Living Roots (C3)
Sediment Deposits (B2)	Oxidized Rhizospheres on Living Roots (	C3) (where tilled)
Drift Deposits (B3)	(where not tilled)	Crayfish Burrows (C8)
Algal Mat or Crust (B4)	Presence of Reduced Iron (C4)	Saturation Visible on Aerial Imagery (C9)
Iron Deposits (B5)	Thin Muck Surface (C7)	Geomorphic Position (D2)
Inundation Visible on Aerial Imagery (B7)	Other (Explain in Remarks)	FAC-Neutral Test (D5)
Water-Stained Leaves (B9)		Frost-Heave Hummocks (D7) (LRR F)
Field Observations:		
Surface Water Present? Yes No	X Depth (inches):	
Water Table Present? Yes No	X Depth (inches):	
Saturation Present? Yes <u>No y</u> (includes capillary fringe)	<u>χ</u> Depth (inches): <b>Wetla</b>	nd Hydrology Present? Yes X No
Describe Recorded Data (stream gauge, monitor	ring well, aerial photos, previous inspections), it	available:
Remarks:		

## WETLAND DETERMINATION DATA FORM – Great Plains Region

Project/Site: VA Access Easement at Ft. Sam Ho	ouston National Cemetery	City/County: <u>San Anto</u>	nio/Bexar	_ Sampling Date: 06 May 2020
Applicant/Owner: <u>Veterans Affairs</u>			State: TX	_ Sampling Point: <u>Data Point 2</u>
Investigator(s): <u>Joshua Zatopek- AmaTerra</u>	Environmental, Inc.	Section, Township, Rai	ıge:	
Landform (hillslope, terrace, etc.): Stream terr	aces	Local relief (concave, o	onvex, none): <u>Concav</u>	ve Slope (%): <u>0-1</u>
Subregion (LRR): <u>LRR I</u>	Lat: <u>2</u> 9.	47852°N	Long: <u>-98.41455°W</u>	Datum: NAD 83
Soil Map Unit Name: <u>Sunev clay loam, 0 to 1</u>	percent slopes		NWI classif	fication: <u>None</u>
Are climatic / hydrologic conditions on the site	typical for this time of ye	ear? Yes <u>X</u> No	(If no, explain in	Remarks.)
Are Vegetation, Soil, or Hydrold	ogy significantly	disturbed? Are "	Normal Circumstances'	" present? Yes X No
Are Vegetation, Soil, or Hydrold	ogy naturally pro	oblematic? (If ne	eded, explain any answ	vers in Remarks.)
SUMMARY OF FINDINGS – Attach	site map showing	g sampling point lo	ocations, transect	ts, important features, etc.
Hydrophytic Vegetation Present? Yes	s X No	In the Complete		
Hydric Soil Present? Yes	s No <u>X</u>	within a Wetlan	Alea d2 Voc	No. X
Wetland Hydrology Present? Yes	s <u>X</u> No			
Remarks:				
Data point was taken within	drainage			

# **VEGETATION – Use scientific names of plants.**

Tree Otreture (Distring 201	Absolute	Dominant	Indicator	Dominance Test worksheet:
<u>Tree Stratum</u> (Plot size: <u>30</u> )	% Cover	<u>Species</u> ?	Status	Number of Dominant Species
1. <u>Celtis laevigata</u>	20	Y	FAC	That Are OBL, FACW, or FAC
2				
3				Total Number of Dominant
4				Species Across All Strata: <u>4</u> (B)
	20	= Total Cov	/er	Percent of Dominant Species
Sapling/Shrub Stratum (Plot size: <u>15'</u> )				That Are OBL, FACW, or FAC:(A/B)
1. <u>Celtis laevigata</u>	5	Υ	FAC	Drevelance Index weeks heads
2. Ligustrum japonicum	5	Υ	UPL	Prevalence Index worksneet:
3				I otal % Cover of: Multiply by:
4.				OBL species x 1 =
5.				FACW species x 2 =
	10	= Total Cov	/er	FAC species <u>110</u> x 3 = <u>330</u>
Herb Stratum (Plot size: <u>5'</u> )				FACU species <u>3</u> x 4 = <u>12</u>
1. Ambrosia trifida	85	Y	FAC	UPL species <u>5</u> x 5 = <u>25</u>
2. Elymus canadensis	3	N	FACU	Column Totals: <u>118</u> (A) <u>367</u> (B)
3.				
4				Prevalence Index = B/A = <u>3.11</u>
5				Hydrophytic Vegetation Indicators:
5				1 - Rapid Test for Hydrophytic Vegetation
0				<u>x</u> 2 - Dominance Test is >50%
/				3 - Prevalence Index is $≤3.0^{1}$
8				4 - Morphological Adaptations <sup>1</sup> (Provide supporting
9				data in Remarks or on a separate sheet)
10				Problematic Hydrophytic Vegetation <sup>1</sup> (Explain)
	88	= Total Cov	ver	
Woody Vine Stratum (Plot size: <u>30</u> )				be present, unless disturbed or problematic.
1				
2				Hydrophytic
		= Total Cov	/er	Present? Yes X No
% Bare Ground in Herb Stratum				
Remains.				

SOIL	SOIL
------	------

Profile Desc	ription: (Describe to	the depth nee	eded to docur	nent the ir	ndicator	or confirm	the absence of indic	cators.)
Depth	Matrix		Redo	x Features	6			
(inches)	Color (moist)	<u>%</u> Co	olor (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>	Texture	Remarks
0-6	10YR 3/1	100					Clay loam	
6-16	10YR 3/2	100					Clay	
				·				
<sup>1</sup> Type: C=Co	oncentration, D=Deplet	tion, RM=Redu	ced Matrix, CS	G=Covered	or Coate	d Sand Gr	ains. <sup>2</sup> Location: I	PL=Pore Lining, M=Matrix.
Hydric Soil	Indicators: (Applicab	le to all LRRs	, unless other	wise note	ed.)		Indicators for Pro	blematic Hydric Soils <sup>3</sup> :
Histosol	(A1)		Sandy (	Gleyed Mat	trix (S4)		1 cm Muck (A9	9) ( <b>LRR I, J</b> )
Histic Ep	oipedon (A2)		Sandy F	Redox (S5)	)		Coast Prairie F	Redox (A16) ( <b>LRR F, G, H</b> )
Black Hi	stic (A3)		Stripped	d Matrix (S	6)		Dark Surface (	(S7) ( <b>LRR G</b> )
Hydroge	n Sulfide (A4)		Loamy I	Mucky Min	eral (F1)		High Plains De	epressions (F16)
<u>Stratified</u>	Layers (A5) (LRR F)		Loamy (	Gleyed Ma	trix (F2)		(LRR H ou	tside of MLRA 72 & 73)
1 cm Mu	ick (A9) (LRR F, G, H)		Deplete	d Matrix (F	3)		Reduced Verti	c (F18)
Depleted	d Below Dark Surface (	A11)	Redox [	Dark Surfa	ce (F6)		Red Parent Ma	aterial (TF2)
Thick Da	ark Surface (A12)	,	Deplete	d Dark Sur	face (F7)		Verv Shallow [	Dark Surface (TF12)
Sandy M	lucky Mineral (S1)		Redox [	Depression	ns (F8)		Other (Explain	in Remarks)
2.5 cm M	lucky Peat or Peat (S2		High Pla	ains Denre	ssions (F	16)	<sup>3</sup> Indicators of hydro	onhytic vegetation and
<u> </u>	icky Peat or Peat (S3)	(I PP F)	<u> </u>	DA 72 8 7		н)	wetland hydrol	ogy must be present
<u> </u>	icky i eat of i eat (00)				5 OI LINN	•••	unless disturbe	ed or problematic.
Restrictive I	_ayer (if present):							
Туре:								
Depth (ind	ches):						Hydric Soil Presen	t? Yes <u>No X</u>
Remarks:								
HYDROLO	GY							
Wetland Hyd	drology Indicators:							

Primary Indicators (minimum of one required; check all that apply)	Secondary Indicators (minimum of two required)
Surface Water (A1)Salt Crust (B11) High Water Table (A2)Aquatic Invertebrates (B13) Saturation (A3)Hvdrogen Sulfide Odor (C1)	<ul> <li>X Surface Soil Cracks (B6)</li> <li>Sparsely Vegetated Concave Surface (B8)</li> <li>V Drainage Patterns (B10)</li> </ul>
Water-Stained Leaves (B9)	Frost-Heave Hummocks (D7) (LRR F)
Field Observations:	
Surface Water Present?     Yes     No X     Depth (inches):       Water Table Present?     Yes     No X     Depth (inches):	-
Saturation Present?     Yes No _X Depth (inches):       (includes capillary fringe)	Wetland Hydrology Present? Yes X No
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous in	spections), if available:
Remarks:	

Appendix C: Photographic Log



Photo 1. View of the eastern ephemeral drainage, facing southeast.



Photo 2. View of the eastern ephemeral drainage, facing northwest.



Photo 3. Great ragweed within the wider area of the eastern ephemeral drainage, facing southeast.



Photo 4. View of the western ephemeral drainage, facing north.

Wetlands Delineation and Report for Veterans Administration's Ft. Sam Houston National Cemetery Phase III Expansion and Improvements Project, San Antonio, Texas





Prepared for Anderson Engineering by: DESERT CONCEPTS ENERGY & ENVIRONMENTAL, INC on behalf of RCK Environmental Services 18102 Talavera Ridge, Suite 2416 San Antonio, TX 78257

October 22, 2019

# ACKNOWLEDGEMENTS

# Anderson Engineering contracted this study with

**RCK Environmental Services, LLC** 

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and

NV5

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# Appendices

Appendix A – Resource Maps and Figures

Appendix B – Resource Data Forms

Appendix C – Photographic Log

# Wetland Assessment and Delineation

# 1.1 Introduction

The RCK Environmental Services/ Desert Concepts Energy & Environmental / NV5 Team performed stream and wetland delineations within the designated survey areas at Fort Sam Houston National Cemetery (See Figure 1 in Appendix A). Initial background and database research were performed, followed by field surveys on September 10-11 and October 1, 2019 to evaluate the project area for federal and state water resources.

# 1.2 Background and Methods

Background research of relevant published and online information sources was conducted prior to field surveys to identify potential ecological resources within the study area. Sources included US Geologic Survey (USGS) topographic maps (Figures 2a and 2b, Appendix A), National Wetland Inventory (NWI) maps (Figures 5a and 5b, Appendix A), and US Department of Agriculture – Natural Resources Conservation Service (USDA-NRCS) soil survey maps of Bexar County (Figures 6a and 6b, Appendix A). Field surveys to assess and document the presence and location of jurisdictional waters of the United States (WOTUS) were conducted in accordance with the *1987 Corps of Engineers Wetlands Delineation Manual and Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Great Plains Region (Version 2.0)*. According to the Classification of Wetlands and Deepwater Habitats of the United States (Cowardin *et al.* 1979) and NWI, the wetlands found on the property are considered palustrine, forested, broad-leaved deciduous, temporarily flooded (PFO1A) wetlands. All wetland boundaries were recorded using a Trimble GEO 7x hand-held GPS unit with sub-meter accuracy.

# 1.3 Wetland Delineation Results

Evidence of wetland hydrology, hydric soil, and hydrophytic vegetation were present. Hydrology indicators observed include surface soils cracks, drift deposits, sediment deposits, water-stained leaves, drainage patterns, sparsely vegetated concave surface, and oxidized rhizospheres on living roots. The hydric soil features observed include mottling and redoximorphic features. Dominant vegetation was hydrophytic and consisted of facultative (FAC), facultative wet (FACW), and obligate (OBL) species. Completed Resource Data Forms documenting site observations are included in Appendix B. Representative photographs of the Project Site are shown in Appendix C.

During the field survey, six resources (Stream [S] 01, S02, Wetland [WL] 03, WL04, WL05, and WL06) were identified and are shown on USGS Topographic Maps (Figures 2a and 2b, Appendix A) and on aerial photographs (Figures 3a/3b in Appendix A). The resources were determined to

be USACE jurisdictional streams and wetlands. The size of each wetland in acres is shown in the Table 1.

WETLAND	ACRES
WL03	0.01
WL04	0.68
WL05	2.6
WL06	4.6

|--|

The upland portions of the project consist of a mixture of developed land (Fort Sam Houston National Cemetery), upland mixed hardwood forest, and shrub scrub land. The wetlands within the survey area are located within the designated FEMA floodplain of Salado Creek (Figures 4a and 4b in Appendix A). Floodplains extend well beyond the boundaries of wetlands and evidence of substantial flooding was observed. The resources identified during the field surveys are shown in the attached resource maps.

Appendix A: Resource Maps





600 900 300 1,200 150

Feet 


















Appendix B: Resource Data Forms

#### Linear Aquatic Resource Field Notes

P.I./Project Name Survey Date	Fort Sam Houston Na 9/11/2019	tional Cemetery		
Surveyors	Beau Marshall	Blake Ellett		
Resource # (field)	S01			
Resource # (report)	Stream02			
✔ Warm Water	Cold Water	Unknown		
Boroppial			Stream flows after rain event, observed in field	
			Trach in channel, coour, upon runoff	
Fully Functiona	I Somewhat Imp	aired Fully Impaired	(impacts):	
Natural	Manipulated	Artificial	(explain): Appears to have been channelized in past	
Direction of Flow:	northwest to SO	utheast		
		difiedsi		
✓ High Flow	Normal Flow	Low Flow	No Flow	
Refugia Pools Pro	esent: 🖌 Yes	No		
Turbidity:	low	✓ moderate	high	
Substrate:	sand	<b>√</b> silt	boulder	
gravel	cobble	bedrock	other:	
Bank Stability:	Moderately Sta	ble 🖌 Somewhat Unsta	able Unstable	
Channel Sinuosity	/: ✔ low	moderate high		
Characteristics (cl	neck those that apply	):		
✓ онwм	✓ Wrested Veg.	Hydric Soils	Abrupt Change in Plant Community	
✓ Sediment Sorti	ing Shelving	Sediment Deposition	✓ scour ✓ wrack line	
If ephemeral, whic	h conditions apply?:			
roadside ditch		water to stream	connects stream to	eam
drains develop	ed area	pland community to stream	n or wetland connects wetland to wetland	
Estimate distance	ce from resource (in r	proiect area) to stream or	wetland that it connects:	
		···· <b>,</b> ································		
Suitable Protected	I Species Habitat:	yes	✓ no if yes, explain:	
Present: Culver	rt 🗸 ves	no	Concrete Flume ves Vno Bridge ves Vno	
	<b>v y =</b>			
Bird nests present	t: yes	✓ no	if yes, explain:	
Indicators of bat p	resence: yes	✓ no	if yes, explain:	
Wetted Width: 3-5	ft		Bankfull/Channel Width: 6 fee	ət
Wetted Depth: 6			inches Bankfull/Channel Depth: 1 fe	et
Bank Height: 0.5	-1		feet	
Buffer width (r Buffer width (l	ight bank) <sup>30</sup> eft bank) 30		feet feet	

**Dominant Buffer Vegetation** (quality, include approx. age of trees if applicable): Japanese privet, winged elm, box elder, mesquite, smilax sp.,

#### Linear Aquatic Resource Field Notes

P.I./Project Name Survey Date	Fort Sam Houston Natio	onal Cemetery						
Surveyors	Blake Ellett	Beau Marshall						
Resource # (field)	01							
Resource # (report)	Stream02							
✔ Warm Water	Cold Water	Unknown						
✓ Perennial	Intermittent	Ephemeral	Other:					
			Urbar	n runoff, trash ir	n channel, scou	ur		
Fully Functiona	I Somewhat Impa	ired Fully Impaired	(impacts):					
Natural	Manipulated	Artificial	(explain): appea	ars to have bee	n channelized			
Direction of Flow:	northwest to sout	theast						
High Flow	Normal Flow	Low Flow	No Flow					
Refugia Pools Pr	esent: Yes	V No						
Turbidity:	Iow	moderate	high					
Substrate:	sand	<b>√</b> silt	boulder	clay				
gravel	cobble	bedrock	other:					
Bank Stability:	Moderately Stab	le 🖌 Somewhat Unsta	ible Unsta	able				
Channel Sinuosity	/: 🖌 low	moderate high						
Characteristics (cl	heck those that apply):			nge in Plant Co	mmunity			
VOHWM	ing  Shelving				mmunity			
	th conditions apply?		V Scoul V					
		vater to stream	connects str	ream to				vetland to stream
drains develop	ed area	land community to stream	or wetland	conne	cts wetland to	wetland		
Estimate distant	ce from resource (in pr	oject area) to stream or	wetland that it con	nects:				
Suitable Protected	d Species Habitat:	yes	🖌 no if yes, ex	kplain:				
Present: Culve	rt 🖌 yes	no	Concrete Flum	e yes	√no	Bridge	yes	√no
	_							
Bird nests presen	t: yes	√ no	if yes, ex	plain:				
Indicators of bat p	yes	🖌 no	if yes, e	xplain:				
Wetted Width: 3			feet	Bankfull/Cha	nnel Width:	10		feet
Bank Height: 4			feet	Dankiuli/Cila	inner Deptil:	კ		teet
Buffer width (r Buffer width (l	ight bank) <sup>50+</sup> eft bank) <sub>50+</sub>		feet feet					

**Dominant Buffer Vegetation** (quality, include approx. age of trees if applicable): Red mulberry, black willow, Japanese privet, (20-30 years old)

Project/Site: Sam Houston National Cemetery	City/County: San Antonio Sampling Date: 9/11/2019					
Applicant/Owner: Department of Veterans Affairs	State: <u>TX</u> Sampling Point: <u>UPL03</u>					
Investigator(s): <u>Blake Ellett, Beau Marshall</u>	Section, Township, Range:					
Landform (hillslope, terrace, etc.): <u>terrace</u>	_ Local relief (concave, convex, none): <u>convex</u> Slope (%): <u>2</u>					
Subregion (LRR): <u>LRR I</u> Lat: <u>29.471637</u>	Long: <u>-98.42218</u> Datum: <u>NAD 1983</u>					
Soil Map Unit Name: <u>VcA-Sunev clay loam, 0-1% slopes</u>	NWI classification: None					
Are climatic / hydrologic conditions on the site typical for this time of y	ear? Yes X No (If no, explain in Remarks.)					
Are Vegetation Soil, or Hydrology significant	ly disturbed? Are "Normal Circumstances" present? Yes X No					
Are Vegetation Soil, or Hydrology naturally p	oroblematic? (If needed, explain any answers in Remarks.)					
SUMMARY OF FINDINGS – Attach site map showing	g sampling point locations, transects, important features, etc.					

Hydrophytic Vegetation Present? Hydric Soil Present? Wetland Hydrology Present?	Yes <u>X</u> No Yes No <u>X</u> Yes No <u>X</u>	Is the Sampled Area within a Wetland?	Yes	No <u>X</u>
Remarks:				

	Absolute	Dominant	Indicator	Dominance Test worksheet:		
<u>Tree Stratum</u> (Plot size: <u>30 sq ft</u> )	% Cover	Species?	Status	Number of Dominant Species		
1. <u>Celtis laevigata</u>	40	Х	FAC	That Are OBL, FACW, or FAC		
2. <u>Acer negundo</u>	25	Х	FAC	(excluding FAC-):5(A)		
3. Populus deltoides	20	Х	FAC	Total Number of Dominant		
4				Species Across All Strata: <u>6</u> (B)		
5				Percent of Dominant Species		
	85	= Total C	over	That Are OBL, FACW, or FAC: <u>83%</u> (A/B)		
Sapling/Shrub Stratum (Plot size: <u>30 sq ft</u> )				<b>-</b> · · · · · · · · · · · · · · · · · · ·		
1. Acer negundo	10	Х	FAC	Prevalence Index worksheet:		
2				Total % Cover of:Multiply by:		
3.				OBL species x 1 =		
4.				FACW species x 2 =		
5				FAC species x 3 =		
···	10	- Total (	over	FACU species x 4 =		
Herb Stratum (Plot size: <u>30 sq ft</u> )	10		00001	UPL species x 5 =		
1. <u>Smilax rotundifolia</u>	5	Х	FAC	Column Totals: (A) (B)		
2. <u>Smilax bona-nox</u>	5	<u> </u>	FACU	Prevalence Index = B/A =		
3	·	. <u> </u>		Hydrophytic Vegetation Indicators:		
4				X Dominance Test is >50%		
5				$\frac{1}{2}$		
6				Prevalence index is ≤5.0		
7				data in Remarks or on a separate sheet)		
8	<u> </u>			Problematic Hydrophytic Vegetation <sup>1</sup> (Explain)		
9						
10				<sup>1</sup> Indicators of hydric soil and wetland hydrology must		
	5	= Total Co	ver	be present, unless disturbed or problematic.		
Woody Vine Stratum (Plot size: 30 sq ft )		-				
1				Hydrophytic		
2				Vegetation		
% Bare Ground in Herb Stratum <u>90</u>	100	= Total	Cover	Present? Yes <u>X</u> No		
Remarks: (Include photo numbers here or on a separate sheet.)						

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)									
Depth	Matrix		Redo	x Features	6				
(inches)	Color (moist)	% Co	olor (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>	Texture Remarks		
0-10	10YR 3/2	100					silt loam		
10-16	10YR 4/3	100					silt loam		
<sup>1</sup> Type: C=Co	oncentration, D=Deple	tion, RM=Redu	iced Matrix, CS	S=Covered	d or Coate	d Sand G	rains. <sup>2</sup> Location: PL=Pore Lining, M=Matrix.		
Hydric Soil	indicators:						Indicators for Problematic Hydric Soils':		
Histosol	(A1)		Sandy (	Gleyed Ma	trix (S4)		1 cm Muck (A9) <b>(LRRI, J)</b>		
Histic Ep	oipedon (A2)		Sandy I	Redox (S5	)		Coast Prairie Redox (A16) (LRR F, G, H)		
Black Hi	stic (A3)		Stripped	d Matrix (S	6)		Dark Surface (S7) (LRR G)		
Hydroge	n Sulfide (A4)		Loamy	Mucky Min	neral (F1)		High Plains Depressions (F16)		
Stratified	Layers (A5) (LRR F)		Loamy	Gleyed Ma	atrix (F2)		(LRRH outside of MLRA 72 & 73)		
1 cm Mu	ck (A9) (LRR F, G, H)		Deplete	d Matrix (F	=3)		Reduced Vertic (F18)		
Depleter	Below Dark Surface	(A11)	Redox Dark Surface (F6)				Red Parent Material (TF2)		
Thick Da	ark Surface (A12)	()	Deplete	d Dark Su	rface (F7)		Other (Explain in Remarks)		
Finick De	lucky Minoral (S1)		Bedox Depressions (F8)				<sup>3</sup> Indicators of hydrophytic vegetation and		
	Augky Deat or Deat (S)		Ligh Plains Depressions (F6)				wetland bydrology must be present		
2.5 CIT N	NUCKY FEAL OF FEAL (S.						weitand hydrology must be present,		
Restrictive I	aver (if observed):			12 @ 130					
Type:	<b>,</b> ,-								
Depth (inc	ches):						Hydric Soil Present? Yes No _X	_	
Remarks:									

## HYDROLOGY

Wetland Hydrology Indicators:						
Primary Indicators (minimum of one is required; ch	Secondary Indicators (minimum of two required)					
Surface Water (A1)	Salt Crust (B11)	Surface Soil Cracks (B6)				
High Water Table (A2)	Aquatic Invertebrates (B13)	Sparsely Vegetated Concave Surface (B8)				
Saturation (A3)	Hydrogen Sulfide Odor (C1)	Drainage Patterns (B10)				
Water Marks (B1)	Dry-Season Water Table (C2)	Oxidized Rhizospheres on Living Roots (C3)				
Sediment Deposits (B2)	Oxidized Rhizospheres on Living I	Roots (C3) (where tilled)				
Drift Deposits (B3)	(where not tilled)	Crayfish Burrows (C8)				
Algal Mat or Crust (B4)	Presence of Reduced Iron (C4)	Saturation Visible on Aerial Imagery (C9)				
Iron Deposits (B5)	Thin Muck Surface (C7)	Geomorphic Position (D2)				
Inundation Visible on Aerial Imagery (B7)	Other (Explain in Remarks)	FAC-Neutral Test (D5)				
Water-Stained Leaves (B9)		Frost-Heave Hummocks (D7) (LRR F)				
Field Observations:						
Surface Water Present? Yes No _>	X_ Depth (inches):					
Water Table Present? Yes No _>	X_ Depth (inches):					
Saturation Present? Yes <u> </u>	X Depth (inches):	Wetland Hydrology Present? Yes No X				
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:						
Remarks:						

Project/Site: Sam Houston National Cemetery	City/County: San Antonio Sampling Date: 9/11/2019
Applicant/Owner: <u>Department of Veterans Affiars</u>	State: <u>TX</u> Sampling Point: <u>WL03</u>
Investigator(s): Blake Ellett, Beau Marshall	Section, Township, Range:
Landform (hillslope, terrace, etc.): <u>depression</u>	Local relief (concave, convex, none): <u>concave</u> Slope (%): <u>2</u>
Subregion (LRR): <u>LRR I</u> Lat: <u>29.471633</u>	Long: <u>-98.42216</u> Datum: <u>NAD 1983</u>
Soil Map Unit Name: VcA-Sunev clay loam, 0-1% slopes	NWI classification: PFO1A
Are climatic / hydrologic conditions on the site typical for this time of y	ear? Yes X No (If no, explain in Remarks.)
Are Vegetation Soil, or Hydrology significant	ly disturbed? Are "Normal Circumstances" present? Yes X No
Are Vegetation Soil, or Hydrology naturally p	roblematic? (If needed, explain any answers in Remarks.)
SUMMARY OF FINDINGS – Attach site map showing	sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Hydric Soil Present? Wetland Hydrology Present?	Yes X No Yes X No Yes X No	Is the Sampled Area within a Wetland?	Yes <u>X</u> No
Remarks:			

	Absolute	Dominant	Indicator	Dominance Test worksheet:		
<u>Tree Stratum</u> (Plot size: <u>30 sq ft</u> )	% Cover	Species?	Status	Number of Dominant Species		
1. <u>Celtis laevigata</u>	30	Х	FAC	That Are OBL, FACW, or FAC		
2. <u>Acer negundo</u>	30	Х	FAC	(excluding FAC-): (A)		
3				Total Number of Dominant		
4	<u> </u>			Species Across All Strata: (B)		
5				Percent of Dominant Species		
	60	= Total C	over	That Are OBL, FACW, or FAC: <u>100%</u> (A/B)		
Sapling/Shrub Stratum (Plot size: <u>30 sq ft</u> )						
1. Acer negundo	20	Х	FAC	Prevalence Index worksheet:		
2				Total % Cover of:Multiply by:		
3.				OBL species x 1 =		
4	_	·		FACW species x 2 =		
5		·		FAC species x 3 =		
		- Total C		FACU species x 4 =		
Herb Stratum (Plot size: 30 sq ft )	20	= 10tal C	Jover	UPL species x 5 =		
1. <u>Smilax rotundifolia</u>	5	Х	FAC	Column Totals: (A) (B)		
2						
3.				Prevalence Index = B/A =		
4				Hydrophytic Vegetation Indicators:		
5				X Dominance Test is >50%		
6.				Prevalence Index is ≤3.0 <sup>1</sup>		
7		·	·	Morphological Adaptations <sup>1</sup> (Provide supporting		
7		·		data in Remarks or on a separate sheet)		
8		·		Problematic Hydrophytic Vegetation <sup>1</sup> (Explain)		
9			<u> </u>			
10				<sup>1</sup> Indicators of hydric soil and wetland hydrology must		
	5	_ = Total Co	ver	be present, unless disturbed or problematic.		
Woody Vine Stratum (Plot size: 30 sq ft )						
1		·		Hydrophytic		
2				Vegetation Present2 Yes Y No		
% Bare Ground in Herb Stratum95	85	_ = Total Co	over			
Remarks: (Include photo numbers here or on a separate sheet.)						

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)									
Depth	Depth Matrix			Features	S				
<u>(inches)</u>	Color (moist)	<u> </u>	olor (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>	Texture Re	marks	
0-5	10YR 3/1	100					silt loam		
5-16	10YR 4/1	95	7.5YR 4/6	5	C	M/PL	silt loam		
		<u> </u>							
<sup>1</sup> Type: C=Co	ncentration, D=Depl	etion, RM=Red	uced Matrix, CS	=Covered	d or Coate	d Sand Gr	ains. <sup>2</sup> Location: PL=Pore L	ining, M=Matrix.	
Hydric Soil I	ndicators:						Indicators for Problematic	Hydric Soils <sup>3</sup> :	
<u>Histosol</u>	(A1)		Sandy G	leyed Ma	atrix (S4)		1 cm Muck (A9) <b>(LRRI, 、</b>	J)	
Histic Ep	ipedon (A2)		Sandy R	edox (S5	)		Coast Prairie Redox (A1	6) <b>(LRR F, G, H)</b>	
Black His	stic (A3)		<u>    Stripped</u>	Matrix (S	6)		Dark Surface (S7) (LRR	G)	
<u> </u>	n Sulfide (A4)		Loamy N	lucky Mir	neral (F1)		High Plains Depressions	s (F16)	
<u>    Stratified</u>	Layers (A5) (LRR F	)	Loamy G	leyed Ma	atrix (F2)		(LRRH outside of MLR	RA 72 & 73)	
1 cm Mu	ck (A9) <b>(LRR F, G, H</b>	I)	X Deplete	ed Matrix	(F3)		Reduced Vertic (F18)		
X Deplete	d Below Dark Surfac	e (A11)	Redox Dark Surface (F6)				Red Parent Material (TF2)		
Thick Da	rk Surface (A12)		Depleted	l Dark Su	rface (F7)		Other (Explain in Remarks)		
Sandy M	ucky Mineral (S1)		X Redox Depressions (F8)				<sup>3</sup> Indicators of hydrophytic vegetation and		
2.5 cm M	lucky Peat or Peat (S	62) (LRR G, H)	High Plains Depressions (F16)			16)	wetland hydrology must be present,		
5 cm Mu	cky Peat or Peat (S3	) (LRR F)	(MLRA 72 & 73 of LRR H)				unless disturbed or problematic.		
Restrictive L	ayer (if observed):								
Туре:									
Depth (inc	hes):						Hydric Soil Present? Yes	<u>X</u> No	
Remarks:									

## HYDROLOGY

Wetland Hydrology Indicators:	
Primary Indicators (minimum of one is required; check all that apply)	Secondary Indicators (minimum of two required)
	X       Surface Soil Cracks (B6)
Water-Stained Leaves (B9)	Frost-Heave Hummocks (D7) (LRR F)
Surface Water Present?       Yes No _X_ Depth (inches):         Water Table Present?       Yes No _X_ Depth (inches):         Saturation Present?       Yes No _X_ Depth (inches):         (includes capillary fringe)       Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspect         Remarks:       Remarks:	Wetland Hydrology Present? Yes X No tions), if available:

Project/Site: Sam Houston National Cemetery	City/County: San Antonio Sampling Date: 9/11/2019
Applicant/Owner: Department of Veterans Affiars	State: <u>TX</u> Sampling Point: <u>UPL04</u>
Investigator(s): <u>Blake Ellett, Beau Marshall</u>	Section, Township, Range:
Landform (hillslope, terrace, etc.): terrace	Local relief (concave, convex, none): <u>concave</u> Slope (%): <u>3</u>
Subregion (LRR): LRR I Lat: 29.471204	Long: <u>-98.420524</u> Datum: <u>NAD 1983</u>
Soil Map Unit Name: VcA-Sunev clay loam, 0-1% slopes	NWI classification: None
Are climatic / hydrologic conditions on the site typical for this time of y	ear? Yes X No (If no, explain in Remarks.)
Are Vegetation Soil, or Hydrology significant	ly disturbed? Are "Normal Circumstances" present? Yes X No
Are Vegetation Soil, or Hydrology naturally p	roblematic? (If needed, explain any answers in Remarks.)
SUMMARY OF FINDINGS – Attach site map showing	y sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Hydric Soil Present? Wetland Hydrology Present?	Yes Yes Yes	No <u>X</u> No <u>X</u> No <u>X</u>	Is the Sampled Area within a Wetland?	Yes	No <u>X</u>
Remarks:					

	Absolute	Dominant	Indicator	Dominance Test worksheet:
<u>Tree Stratum</u> (Plot size: <u>30 sq ft</u> )	% Cover	Species?	Status	Number of Dominant Species
1. <u>Celtis occidentalis</u>	50	Х	FACU	That Are OBL, FACW, or FAC
2				(excluding FAC-): (A)
3				Total Number of Dominant
4				Species Across All Strata:5(B)
5.				Percent of Dominant Species
	50	= Total C	over	That Are OBL, FACW, or FAC: <u>20%</u> (A/B)
<u>Sapling/Shrub Stratum</u> (Plot size: <u>30 sq ft</u> )				
1. <u>Prosopis glandulosa</u>	15	Х	FACU	Prevalence Index worksheet:
2. Ligustrum japonicum	25	х	UPL	Total % Cover of: Multiply by:
3				OBL species x 1 =
4				FACW species x 2 =
5				FAC species x 3 =
		- Total Co	wor	FACU species x 4 =
Herb Stratum (Plot size: 30 sq ft )	40			UPL species x 5 =
1. Smilax bona-nox	5	Х	FACU	Column Totals: (A) (B)
2. Ampelopsis arborea	5	Х	FAC	
3.				Prevalence Index = B/A =
4				Hydrophytic Vegetation Indicators:
5	·			Dominance Test is >50%
6.	·			Prevalence Index is ≤3.0 <sup>1</sup>
7				Morphological Adaptations <sup>1</sup> (Provide supporting
·				data in Remarks or on a separate sheet)
0			<u> </u>	Problematic Hydrophytic Vegetation <sup>1</sup> (Explain)
9		. <u> </u>		
10		·	<u> </u>	<sup>1</sup> Indicators of hydric soil and wetland hydrology must
Weady Vine Stratum (Plat aize: 20 ag ft )	10	_ = Total Co	over	be present, unless disturbed or problematic.
Woody vine Stratum (Flot size. 30 sq it )				
l				Hydrophytic Venetation
2				Present? Yes No X
% Bare Ground in Herb Stratum <u>90</u>	100	= Total Cov	/er	
Remarks: (Include photo numbers here or on a separate	sheet.)			·

SOIL
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Sampling Point:

Depth	Matrix		Redo	x Features	i			
(inches)	Color (moist)	<u>%</u> Co	lor (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>	Texture	Remarks
0-10	10YR 3/2	100					silt loam	
10-16	10YR 4/3	100		·			loam	
<u> </u>								
Type: C=C Ivdric Soil	oncentration, D=Deple Indicators:	etion, RM=Redu	ced Matrix, CS	3=Covered	or Coate	d Sand Gr	rains. <sup>2</sup> Location: F Indicators for Pro	PL=Pore Lining, M=Matrix.
Histosol	l (A1)		Sandy	Gleved Mat	trix (S4)		1 cm Muck (A9	) (LRRI, J)
Histic Ep	Histic Epipedon (A2)			Sandy Redox (S5)			Coast Prairie F	Redox (A16) (LRR F, G, H)
Black Hi	ck Histic (A3) Stripped Mat			Stripped Matrix (S6)			Dark Surface (	S7) (LRR G)
 Hydroge	Hydrogen Sulfide (A4)			Loamy Mucky Mineral (F1)			High Plains De	pressions (F16)
Stratified	atified Layers (A5) (LRR F)			Loamy Gleved Matrix (F2)			(LRRH outsid	e of MLRA 72 & 73)
 1 cm Mu	n Muck (A9) <b>(LRR F, G, H)</b>			Depleted Matrix (F3)			Reduced Vertic	, (F18)
Depleted Below Dark Surface (A11) Redox Dark Surface (F6)			Red Parent Ma	iterial (TF2)				
Thick Dark Surface (A12)		Deplete	Depleted Dark Surface (F7)			Other (Explain	in Remarks)	
Sandy Mucky Mineral (S1) Beday Depressions (E8)			<sup>3</sup> Indicators of hydrophytic vegetation and					
2.5 cm Mucky Milleral (S1) Red Albert (S2) (I PP C H) High Plains Depressions (F16)				16)	wetland hydrol	av must be present		
2.5 cm Mucky Peat or Peat (S2) (LRR G, H) High Plains Depressions (F16) 5 cm Mucky Peat or Peat (S3) (LRR F) (MI RA 72 & 73 of LRR H)		10)	unless disturbe	ed or problematic.				
estrictive	Layer (if observed):	/(/						
Type:								
Depth (in	ches):						Hydric Soil Presen	t? Yes No <u>_X</u>
Deput (iii)								

Wetland Hydrology Indicato	rs:		
Primary Indicators (minimum	of one is required	; check all that apply)	Secondary Indicators (minimum of two required)
<ul> <li>Surface Water (A1)</li> <li>High Water Table (A2)</li> <li>Saturation (A3)</li> <li>Water Marks (B1)</li> <li>Sediment Deposits (B2)</li> <li>Drift Deposits (B3)</li> <li>Algal Mat or Crust (B4)</li> <li>Iron Deposits (B5)</li> <li>Inundation Visible on Aer</li> </ul>	al Imagery (B7)	<ul> <li>Salt Crust (B11)</li> <li>Aquatic Invertebrates (B13)</li> <li>Hydrogen Sulfide Odor (C1)</li> <li>Dry-Season Water Table (C2)</li> <li>Oxidized Rhizospheres on Living (where not tilled)</li> <li>Presence of Reduced Iron (C4)</li> <li>Thin Muck Surface (C7)</li> <li>Other (Explain in Remarks)</li> </ul>	Surface Soil Cracks (B6)     Sparsely Vegetated Concave Surface (B8)     Drainage Patterns (B10)     Oxidized Rhizospheres on Living Roots (C3) <b>(where tilled)</b> Crayfish Burrows (C8)     Saturation Visible on Aerial Imagery (C9)     Geomorphic Position (D2)     FAC-Neutral Test (D5)
Water-Stained Leaves (BS	)		Frost-Heave Hummocks (D7) (LRR F)
Field Observations:			
Surface Water Present?	Yes No	X Depth (inches):	
Water Table Present?	Yes No	X Depth (inches):	
Saturation Present? (includes capillary fringe)	Yes No	X Depth (inches):	Wetland Hydrology Present? Yes No X
Describe Recorded Data (stre	am gauge, monit	oring well, aerial photos, previous inspec	tions), if available:
Remarks:			

Project/Site: <u>Sam Houston National Cemetery</u>	City/County: <u>San Antonio</u>		Sampling Date: <u>9/11/2019</u>
Applicant/Owner: Department of Veterans Affairs		State: <u>TX</u>	Sampling Point: <u>WL04</u>
Investigator(s): <u>Blake Ellett, Beau Marshall</u>	Section, Township, Range:		
Landform (hillslope, terrace, etc.): <u>depression</u>	_ Local relief (concave, conve	x, none): <u>concave</u>	Slope (%): <u>2</u>
Subregion (LRR): LRR I Lat: 29.471014	Long: <u>-98.42052</u> 4	4	Datum: <u>NAD 1983</u>
Soil Map Unit Name: <u>VcA-Sunev clay loam, 0-1% slopes</u>		NWI classificatio	n: PFO1A
Are climatic / hydrologic conditions on the site typical for this time of ye	ear? Yes <u>X</u> No	(If no, explain in Re	emarks.)
Are Vegetation Soil, or Hydrology significantl	/ disturbed? Are "Normal	Circumstances" pr	esent? Yes <u>X</u> No
Are Vegetation Soil, or Hydrology naturally p	oblematic? (If needed, e	explain any answers	s in Remarks.)
SUMMARY OF FINDINGS – Attach site map showing	sampling point locatio	ons, transects,	important features, etc.

Hydrophytic Vegetation Present? Hydric Soil Present? Wetland Hydrology Present?	Yes <u>X</u> No Yes <u>X</u> No Yes <u>X</u> No	Is the Sampled Area within a Wetland?	Yes <u>X</u> No
Remarks:			

	Absolute	Dominant	Indicator	Dominance Test worksheet:
<u>Tree Stratum</u> (Plot size: <u>30 sq ft</u> )	% Cover	Species?	Status	Number of Dominant Species
1. <u>Celtis laevigata</u>	40		FAC	That Are OBL, FACW, or FAC
2. Acer negundo	25		FAC	(excluding FAC-): $5$ (A)
3	<u> </u>			Total Number of Dominant
4				Species Across All Strata: <u>5</u> (B)
5				Percent of Dominant Species
	65	= Total Co	ver	That Are OBL, FACW, or FAC: <u>100%</u> (A/B)
Sapling/Shrub Stratum (Plot size: 30 sq ft )		_		Describer of history whether the
1. Acer negundo	35	Х	FAC	Prevalence index worksneet:
2				Total % Cover of:Multiply by:
3.				OBL species x 1 =
4.				FACW species x 2 =
5				FAC species x 3 =
···	35	= Total Cov		FACU species x 4 =
<u>Herb Stratum</u> (Plot size: <u>30 sq ft</u> )	0	Total Cov		UPL species x 5 =
1. Ampelopsis arborea	15	X	FAC	Column Totals: (A) (B)
2. Panicum anceps	15	Х	FAC	
3.				Prevalence Index = B/A =
4.				Hydrophytic Vegetation Indicators:
5				<u>X</u> Dominance Test is >50%
6		·		Prevalence Index is ≤3.0 <sup>1</sup>
7	·			Morphological Adaptations <sup>1</sup> (Provide supporting
0				data in Remarks or on a separate sheet)
0				Problematic Hydrophytic Vegetation <sup>1</sup> (Explain)
9				
10				<sup>1</sup> Indicators of hydric soil and wetland hydrology must
Woody Vine Stratum (Plot size: 30 sq.ft )	30 =	I otal Cove	r	be present, unless disturbed or problematic.
1				
1				Hydrophytic Vegetation
	400			Present? Yes X No
% Bare Ground in Herb Stratum <u>70</u>	<u>130</u> =	Total Cover		
Remarks: (Include photo numbers here or on a separate s	sheet.)			

Sampling Point:

Depin	Matrix		Redo	x Features	6				
(inches)	Color (moist)	<u>%</u> C	olor (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>	Texture Rem	narks	
0-4	10YR 3/1	100					silt loam		
4-16	10YR 4/2	90	7.5YR 4/6	10	C	M/PL	silt loam		
					·				
						·			
Type: C=C Iydric Soil	oncentration, D=Depl Indicators:	etion, RM=Redu	uced Matrix, CS	S=Covered	l or Coate	d Sand Gra	ins. <sup>2</sup> Location: PL=Pore Lir Indicators for Problematic H	ning, M=Matrix. vdric Soils <sup>3</sup> :	
Histosol	(A1)		Sandv (	Gleved Ma	trix (S4)		1 cm Muck (A9) (LRRI. J)		
Histic E	pipedon (A2)		Sandy Redox (S5)				Coast Prairie Redox (A16) (LRR F. G. H)		
Black Histic (A3)			Stripped Matrix (S6)				Dark Surface (S7) (LRR G)		
Hydrogen Sulfide (A4)			Loamy Mucky Mineral (F1)				High Plains Depressions (F16)		
Stratified Lavers (A5) (LRR F)			Loamv	Gleved Ma	atrix (F2)		(LRRH outside of MLRA 72 & 73)		
1 cm Muck (A9) (LRR F. G. H)			X Deplete	ed Matrix (	F3)		Reduced Vertic (E18)		
X Depleted Below Dark Surface (A11)			Redox I	Dark Surfa	ce (F6)		Red Parent Material (TF2)	)	
Thick Dark Surface ( $\Delta 12$ )			Deplete	d Dark Su	rface (F7)		Other (Explain in Remarks	/ S)	
Sandy Mucky Mineral (S1)			X Redox	Depressio	nace (F8)		<sup>3</sup> Indicators of hydrophytic year	etation and	
2.5 cm Mucky Peat or Peat (S2) (I PP C H)			High Pl	ains Denre	essions (F	16)	wetland bydrology must be	e present	
2.0 0///1 5 cm Mi	ucky Peat or Peat (S3	(LRR F)	(MLRA 72 & 73 of LRR H)			10)	unless disturbed or proble	matic.	
Restrictive	Layer (if observed):	/(/	(						
Type:									
Depth (in	ches):						Hydric Soil Present? Yes _	<u>X No</u>	
Remarks:									

Wetland Hydrology Indica	iors:		
Primary Indicators (minimum	n of one is required;	Secondary Indicators (minimum of two required)	
Surface Water (A1)		X Surface Soil Cracks (B6)	
High Water Table (A2)		Aquatic Invertebrates (B13)	Sparsely Vegetated Concave Surface (B8)
Saturation (A3)		Hydrogen Sulfide Odor (C1)	_ Drainage Patterns (B10)
Water Marks (B1)		Dry-Season Water Table (C2)	Oxidized Rhizospheres on Living Roots (C3)
Sediment Deposits (B2)		X Oxidized Rhizospheres on Living	g Roots (C3) (where tilled)
Drift Deposits (B3)		(where not tilled)	Crayfish Burrows (C8)
Algal Mat or Crust (B4)		Presence of Reduced Iron (C4)	Saturation Visible on Aerial Imagery (C9)
Iron Deposits (B5)		Thin Muck Surface (C7)	X Geomorphic Position (D2)
Inundation Visible on A	erial Imagery (B7)	FAC-Neutral Test (D5)	
Water-Stained Leaves (B	39)		Frost-Heave Hummocks (D7) (LRR F)
Field Observations:			
Surface Water Present?	Yes No	X Depth (inches):	
Water Table Present?	Yes <u>No</u>	X Depth (inches):	
Saturation Present? (includes capillary fringe)	Yes <u>No</u>	X Depth (inches):	Wetland Hydrology Present? Yes X No
Describe Recorded Data (st	ream gauge, monito	ring well, aerial photos, previous inspec	ctions), if available:
Remarks:			

Project/Site: Sam Houston National Cemetery	City/County: San Antonio Sampling Date: 9/11/2019
Applicant/Owner: Department of Veterans Affiars	State: <u>TX</u> Sampling Point: <u>UPL05</u>
Investigator(s): <u>Blake Ellett, Beau Marshall</u>	Section, Township, Range:
Landform (hillslope, terrace, etc.): <u>terrace</u>	Local relief (concave, convex, none): <u>concave</u> Slope (%): <u>3</u>
Subregion (LRR): LRR I Lat: 29.470934	Long: <u>-98.417723</u> Datum: <u>NAD 1983</u>
Soil Map Unit Name: <u>VcA-Sunev clay loam, 0-1% slopes</u>	NWI classification: None
Are climatic / hydrologic conditions on the site typical for this time of	year? Yes X No (If no, explain in Remarks.)
Are Vegetation Soil, or Hydrology significan	tly disturbed? Are "Normal Circumstances" present? Yes X No
Are Vegetation Soil, or Hydrology naturally	problematic? (If needed, explain any answers in Remarks.)
SUMMARY OF FINDINGS - Attach site man showin	a sampling point locations, transacts, important features, etc.

#### SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Hydric Soil Present? Wetland Hydrology Present?	Yes Yes Yes	No <u>X</u> No <u>X</u> No <u>X</u>	Is the Sampled Area within a Wetland?	Yes	No <u>X</u>
Remarks:					

	Absolute	Dominant	Indicator	Dominance Test worksheet:
Tree Stratum (Plot size:)	% Cover	Species?	Status	Number of Dominant Species
1. <u>Acer negundo</u>	50		FAC	That Are OBL, FACW, or FAC
2. <u>Celtis occidentalis</u>	50		FACU	(excluding FAC-): $(A)$
3				Total Number of Dominant
4				Species Across All Strata: <u>6</u> (B)
5.				Percent of Dominant Species
	100	= Total	Cover	That Are OBL, FACW, or FAC: <u>33%</u> (A/B)
Sapling/Shrub Stratum (Plot size:)				
1. <u>Prosopis glandulosa</u>	15		FACU	Prevalence Index worksheet:
2. Ligustrum japonicum	25		UPL	Total % Cover of:Multiply by:
3.				OBL species x 1 =
4.				FACW species x 2 =
5	- <u> </u>			FAC species <u>55</u> x 3 = <u>165</u>
···	35	= Total (	over	FACU species <u>70</u> x 4 = <u>280</u>
Herb Stratum (Plot size:)				UPL species x 5 =25
1. Smilax bona-nox	5		FACU	Column Totals: <u>150</u> (A) <u>570</u> (B)
2. Ampelopsis arborea	5		FAC	
3				Prevalence Index = B/A = <u>3.8</u>
۵ ۸				Hydrophytic Vegetation Indicators:
	·			Dominance Test is >50%
5	<u> </u>			Prevalence Index is ≤3.0 <sup>1</sup>
0	·	·		Morphological Adaptations <sup>1</sup> (Provide supporting
7				data in Remarks or on a separate sheet)
8		. <u> </u>	·	Problematic Hydrophytic Vegetation <sup>1</sup> (Explain)
9			. <u> </u>	
10				<sup>1</sup> Indicators of hydric soil and wetland hydrology must
	10	_ = Total C	over	be present, unless disturbed or problematic.
Woody Vine Stratum (Plot size:)				
1	·		<u> </u>	Hydrophytic
2			. <u> </u>	Vegetation Present? Yes No X
% Bare Ground in Herb Stratum <u>90</u>	150	= Tota	l Cover	
Remarks: (Include photo numbers here or on a separate s	sheet.)			

Sampling Point:

Profile Desc	ription: (Describe to	o the depth ne	eded to docur	nent the ir	dicator o	or confirm	the absence of indic	ators.)	
Depth	Matrix		Redo	x Features					
(inches)	Color (moist)	<u>%</u> Co	olor (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>	Texture	Remarks	
0-16	10YR 3/2	100					silt loam		
				· ·	·		·		
<u> </u>				·					
<sup>1</sup> Type: C=Co	ncentration, D=Deple	etion, RM=Redu	iced Matrix, CS	S=Covered	or Coate	d Sand Gr	ains. <sup>2</sup> Location: F	PL=Pore Lining, M=Matrix.	
Hydric Soil I	ndicators:						Indicators for Pro	blematic Hydric Soils <sup>3</sup> :	
<u> </u>	(A1)		Sandy C	Bleyed Mat	rix (S4)		1 cm Muck (A9	୬) <b>(LRRI, J)</b>	
Histic Ep	ipedon (A2)		Sandy F	Redox (S5)			Coast Prairie F	Redox (A16) <b>(LRR F, G, H)</b>	
Black His	stic (A3)		Stripped	Matrix (Se	5)		Dark Surface (	(S7) <b>(LRR G)</b>	
Hydrogei	n Sulfide (A4)		Loamy I	Aucky Mine	eral (F1)		High Plains De	pressions (F16)	
Stratified	Layers (A5) (LRR F)		Loamy (	Gleyed Ma	trix (F2)		(LRRH outsic	le of MLRA 72 & 73)	
1 cm Mu	ck (A9) <b>(LRR F, G, H</b>	)	Deplete	d Matrix (F	3)		Reduced Verti	c (F18)	
Depleted	Below Dark Surface	(A11)	Redox [	Dark Surfac	ce (F6)		Red Parent Ma	aterial (TF2)	
Thick Da	rk Surface (A12)		Depleted Dark Surface (F7)				Other (Explain in Remarks)		
Sandy M	ucky Mineral (S1)		Redox [	Depression	s (F8)		<sup>3</sup> Indicators of hydrophytic vegetation and		
2.5 cm N	lucky Peat or Peat (S	52) <b>(LRR G, H)</b>	High Pla	ains Depres	ssions (F	16)	wetland hydrology must be present,		
5 cm Mu	cky Peat or Peat (S3)	) (LRR F)	(MLRA	72 & 73 of	LRR H)		unless disturbe	ed or problematic.	
Restrictive L	ayer (if observed):								
Туре:									
Depth (inc	hes):						Hydric Soil Presen	t? Yes <u>No X</u>	
Remarks:									

## HYDROLOGY

Wetland Hydrology Indicators:				
Primary Indicators (minimum of one is required; check all that	t apply) Secondary Indicators (minimum of two rec	quired)		
Surface Water (A1) Salt Cru	ust (B11) Surface Soil Cracks (B6)			
High Water Table (A2) Aquatic	c Invertebrates (B13) Sparsely Vegetated Concave Surface	e (B8)		
Saturation (A3) Hydroge	jen Sulfide Odor (C1) Drainage Patterns (B10)			
Water Marks (B1) Dry-Sea	ason Water Table (C2) Oxidized Rhizospheres on Living Roc	ots (C3)		
Sediment Deposits (B2) Oxidize	ed Rhizospheres on Living Roots (C3) (where tilled)			
Drift Deposits (B3) (where	e not tilled) Crayfish Burrows (C8)			
Algal Mat or Crust (B4) Presend	ce of Reduced Iron (C4) Saturation Visible on Aerial Imagery (	(C9)		
Iron Deposits (B5) Thin Mu	uck Surface (C7) Geomorphic Position (D2)			
Inundation Visible on Aerial Imagery (B7) Other (B	Explain in Remarks) FAC-Neutral Test (D5)	FAC-Neutral Test (D5)		
Water-Stained Leaves (B9)	Frost-Heave Hummocks (D7) (LRR F	<sup>;</sup> )		
Field Observations:				
Surface Water Present? Yes No X Depth (	(inches):			
Water Table Present? Yes No X Depth (	(inches):			
Saturation Present? Yes <u>No X</u> Depth ( (includes capillary fringe)	(inches): Wetland Hydrology Present? Yes No	<u>x </u>		
Describe Recorded Data (stream gauge, monitoring well, aeri	ial photos, previous inspections), if available:			
Remarks:				

Project/Site: Sam Houston National Cemetery	City/County: San Antonio		Sampling Date: <u>9/11/2019</u>
Applicant/Owner: Department of Veterans Affairs		State: TX	Sampling Point: <u>WL05</u>
Investigator(s): Blake Ellett, Beau Marshall	Section, Township, Range: _		_
Landform (hillslope, terrace, etc.): <u>depression</u>	Local relief (concave, conv	ex, none): <u>concave</u>	Slope (%): <u>2</u>
Subregion (LRR): _LRR I Lat: _29.470624	Long: <u>-98.4160</u>	49	Datum: NAD 1983
Soil Map Unit Name: <u>VcA-Sunev clay loam, 0-1% slopes</u>		NWI classificatio	n: PF01A
Are climatic / hydrologic conditions on the site typical for this time of ye	ar? Yes <u>X</u> No	(If no, explain in Re	emarks.)
Are Vegetation Soil, or Hydrology significantly	/ disturbed? Are "Norma	al Circumstances" pr	esent? Yes <u>X</u> No <u>X</u>
Are Vegetation Soil, or Hydrology naturally pr	oblematic? (If needed,	explain any answers	s in Remarks.)
SUMMARY OF FINDINGS – Attach site map showing	sampling point locati	ons, transects,	important features, etc.

F F V	lydrophytic Vegetation Present? lydric Soil Present? Vetland Hydrology Present?	Yes <u>X</u> Yes <u>X</u> Yes <u>X</u>	No No No	Is the Sampled Area within a Wetland?	Yes _	x	No
F	Remarks:						

	Absolute	Dominant	Indicator	Dominance Test worksheet:
<u>Tree Stratum</u> (Plot size: <u>30 sq ft</u> )	% Cover	Species?	Status	Number of Dominant Species
1. Populus deltoides	50		FAC	That Are OBL, FACW, or FAC
2. <u>Acer negundo</u>	40		FAC	(excluding FAC-): (A)
3.				Total Number of Dominant
4				Species Across All Strata: (B)
5.				Percent of Dominant Species
	90	= Total C	over	That Are OBL, FACW, or FAC: <u>100</u> (A/B)
Sapling/Shrub Stratum (Plot size: 30 sq ft )				
1. <u>Acer negundo</u>	25	Х	FAC	Prevalence Index worksheet:
2.				Total % Cover of:Multiply by:
3				OBL species x 1 =
۵ ۸				FACW species x 2 =
4				FAC species x 3 =
J				FACU species x 4 =
Herb Stratum (Plot size: 30 sq ft )	25	$_{-}$ = 1 otal C	over	UPL species x 5 =
1. <u>Carex emoryi</u>	15	Х	OBL	Column Totals: (A) (B)
2.				
3				Prevalence Index = B/A =
A.	·			Hydrophytic Vegetation Indicators:
	·			X Dominance Test is >50%
5	·			Prevalence Index is ≤3.0 <sup>1</sup>
07				Morphological Adaptations <sup>1</sup> (Provide supporting
7				data in Remarks or on a separate sheet)
8				Problematic Hydrophytic Vegetation <sup>1</sup> (Explain)
9				
10				<sup>1</sup> Indicators of hydric soil and wetland hydrology must
	15	_ = Total C	over	be present, unless disturbed or problematic.
<u>woody vine Stratum</u> (Piot size: <u>30 sq it</u> )				
1. None				Hydrophytic
2				Vegetation Present? Yes X No
% Bare Ground in Herb Stratum <u>75</u>	130	= Total	Cover	
Remarks: (Include photo numbers here or on a separate	sheet.)			

Profile Desc	ription: (Describe to	o the depth ne	eded to docum	ent the i	ndicator	or confirm	the absence of	indicators.)	
Depth	Matrix		Redox Features						
(inches)	Color (moist)	% C	olor (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>	Texture	Remarks	
0-16	10YR 3/1	95	7.5 YR 5/2	5	С	M, PL	silt loam		
·			,						
<sup>1</sup> Type: C=Co	oncentration, D=Deple	etion, RM=Redu	uced Matrix, CS	=Covered	l or Coate	d Sand Gr	ains. <sup>2</sup> Locat	ion: PL=Pore Lining, M=Matrix.	
Hydric Soil	Indicators:						Indicators fo	r Problematic Hydric Soils <sup>3</sup> :	
Histosol	(A1)		Sandy G	leyed Ma	trix (S4)		1 cm Mu	ck (A9) <b>(LRRI, J)</b>	
Histic Ep	oipedon (A2)		Sandy Redox (S5)				Coast Prairie Redox (A16) (LRR F, G, H)		
Black Hi	stic (A3)		<u>    Stripped</u>	Matrix (S	6)		Dark Sur	face (S7) <b>(LRR G)</b>	
Hydroge	n Sulfide (A4)		Loamy M	lucky Min	eral (F1)		High Plai	ns Depressions (F16)	
Stratified	l Layers (A5) <b>(LRR F)</b>		Loamy G	leyed Ma	atrix (F2)		(LRRH c	outside of MLRA 72 & 73)	
1 cm Mu	ick (A9) (LRR F, G, H	)	Depleted	Matrix (F	-3)		Reduced	Vertic (F18)	
Depleted	d Below Dark Surface	(A11)	X Redox Dark Surface (F6)				Red Pare	ent Material (TF2)	
Thick Da	ark Surface (A12)		Depleted Dark Surface (F7)				Other (Explain in Remarks)		
Sandy M	lucky Mineral (S1)		X Redox Depressions (F8)				<sup>3</sup> Indicators of hydrophytic vegetation and		
2.5 cm M	/lucky Peat or Peat (S	2) (LRR G, H)	— High Plains Depressions (F16)				wetland h	ydrology must be present,	
5 cm Mucky Peat or Peat (S3) (LRR F)			(MLRA 72 & 73 of LRR H)				unless di	sturbed or problematic.	
Restrictive I	_ayer (if observed):								
Туре:									
Depth (ind	ches):						Hydric Soil Pr	resent? Yes <u>X</u> No	
Remarks:									

## HYDROLOGY

Wetland Hydrology Indicators:				
Primary Indicators (minimum of one is required	Secondary Indicators (minimum of two required)			
Surface Water (A1)	Salt Crust (B11)	X Surface Soil Cracks (B6)		
High Water Table (A2)	Aquatic Invertebrates (B13)	X Sparsely Vegetated Concave Surface (B8)		
Saturation (A3)	Hydrogen Sulfide Odor (C1)	Drainage Patterns (B10)		
Water Marks (B1)	Dry-Season Water Table (C2)	<ul> <li>Oxidized Rhizospheres on Living Roots (C3)</li> </ul>		
Sediment Deposits (B2)	X Oxidized Rhizospheres on Living I	Roots (C3) (where tilled)		
Drift Deposits (B3)	(where not tilled)	Crayfish Burrows (C8)		
Algal Mat or Crust (B4)	Presence of Reduced Iron (C4)	Saturation Visible on Aerial Imagery (C9)		
Iron Deposits (B5)	Thin Muck Surface (C7)	X Geomorphic Position (D2)		
Inundation Visible on Aerial Imagery (B7)	Other (Explain in Remarks)	X FAC-Neutral Test (D5)		
X Water-Stained Leaves (B9)		Frost-Heave Hummocks (D7) (LRR F)		
Field Observations:				
Surface Water Present? Yes No	X Depth (inches):			
Water Table Present? Yes No	X Depth (inches):			
Saturation Present? Yes <u> </u>	X Depth (inches):	Wetland Hydrology Present? Yes X No		
Describe Recorded Data (stream gauge, monit	oring well, aerial photos, previous inspec	tions), if available:		
Remarks:				

Project/Site: Sam Houston National Cemetery	City/County: San Antonio Sampling Date: 9/11/2019
Applicant/Owner: <u>Department of Veterans Affairs</u>	State: <u>TX</u> Sampling Point: <u>UPL06</u>
Investigator(s): <u>Blake Ellett, Beau Marshall</u>	Section, Township, Range:
Landform (hillslope, terrace, etc.): terrace	_ Local relief (concave, convex, none): <u>concave</u> Slope (%): <u>3</u>
Subregion (LRR): <u>LRR I</u> Lat: <u>29.476295</u>	Long: <u>-98.411941</u> Datum: <u>NAD 1983</u>
Soil Map Unit Name: <u>VcA-Sunev clay loam, 0-1% slopes</u>	NWI classification: None
Are climatic / hydrologic conditions on the site typical for this time of y	ear? Yes X No (If no, explain in Remarks.)
Are Vegetation Soil, or Hydrology significant	ly disturbed? Are "Normal Circumstances" present? Yes X No
Are Vegetation Soil, or Hydrology naturally p	oroblematic? (If needed, explain any answers in Remarks.)
SUMMARY OF FINDINGS – Attach site map showing	g sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Hydric Soil Present? Wetland Hydrology Present?	Yes Yes Yes	No <u>X</u> No <u>X</u> No <u>X</u>	Is the Sampled Area within a Wetland?	Yes	NoX
Remarks:					

	Absolute	Dominant	Indicator	Dominance Test worksheet:
Tree Stratum (Plot size: <u>30 sq. ft.</u> )	% Cover	Species?	Status	Number of Dominant Species
1. <u>Populus deltoides</u>	25	Х	FAC	That Are OBL, FACW, or FAC
2. <u>Celtis Laevigata</u>	40	Χ	FAC	(excluding FAC-): $2$ (A)
3				Total Number of Dominant
4				Species Across All Strata: (B)
5				Percent of Dominant Species
	65	= Total C	Cover	That Are OBL, FACW, or FAC: <u>50%</u> (A/B)
<u>Sapling/Shrub Stratum</u> (Plot size: <u>30 sq. ft</u> )				Provolonoo Index workshooti
1. Ligustrum japonicum	35	<u> </u>	UPL	
2				I otal % Cover or: Multiply by:
3				OBL species x 1 =
4				FACW species x 2 =
5.				FAC species <u>65</u> x 3 = <u>195</u>
	35	= Total C	Cover	FACU species25 x 4 =100
Herb Stratum (Plot size: <u>30 sq. ft</u> )				UPL species x 5 =
1. <u>Chasmanthium latifolium</u>	25	Х	FACU	Column Totals: <u>125</u> (A) <u>470</u> (B)
2				Dravalance index $= D/A = -2.76$
3				Prevalence index – B/A – <u>3.70</u>
4				Hydrophytic Vegetation Indicators:
5				Dominance Test is >50%
6.				Prevalence Index is ≤3.0 <sup>1</sup>
7.	_			Morphological Adaptations <sup>1</sup> (Provide supporting data in Remarks or on a separate sheet)
8.				Problematic Hydrophytic Vegetation <sup>1</sup> (Explain)
9.				
10				The discount of the data and the data of the data is the second sec
10	25	= Total C	over	Indicators of hydric soil and wetland hydrology must be present unless disturbed or problematic
<u>Woody Vine Stratum</u> (Plot size: <u>30 sq. ft</u> )	20		0001	
1.				Hydrophytic
2.				Vegetation
% Bare Ground in Herb Stratum <u>75</u>	125	= Tota	al Cover	Present? Yes <u>No X</u>
Remarks: (Include photo numbers here or on a separate				
	sheet.)			
	sheet.)			

Sampling Point:

Depth	Matrix		Redox Features							
(inches)	Color (moist)	<u>%</u> Co	lor (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>	Texture	Remarks		
0-16	10YR 3/2	100					loam			
							· ·			
							<u> </u>			
							·			
Type: C=Co	ncentration, D=Deple	etion, RM=Redu	ced Matrix, CS	S=Covered	or Coate	d Sand Gr	rains. <sup>2</sup> Location:	PL=Pore Lining, M=Matrix.		
iyaric Soil li	ndicators:						Indicators for Pr	oblematic Hydric Solls":		
Histosol (A1)			Sandy (	Gleyed Matr	rix (S4)		1 cm Muck (A9) (LRRI, J)			
Histic Epipedon (A2)			Sandy I	Redox (S5)			Coast Prairie Redox (A16) (LRR F, G, H)			
Black Histic (A3)			Strippe	d Matrix (S6	i)		Dark Surface (S7) (LKK G)			
Hydrogen Sulfide (A4)			Loamy	Mucky Mine	eral (F1)		(I PPH outside of MI PA 72 9 72)			
Stratified Layers (A5) (LRR F)			Loamy	Gleyed Mat	.rix (F2)			Reduced Vertic (F18)		
I CIII Mud	CK (A9) (LKK F, G, N Rolow Dark Surface	Redox Dark Surface (F6)				Red Parent Material (TE2)				
Depleted	rk Surface (A12)	Depleted Dark Surface (F7)				Other (Explain in Remarks)				
Sandy M	ucky Mineral (S1)	Bepreted Dark Odnace (F7) Redox Depressions (F8)				<sup>3</sup> Indicators of hydrophytic vegetation and				
2.5 cm M	lucky Peat or Peat (S	32) (I RR G H)	High Pl	ains Denres	ssions (F	16)	wetland hydrology must be present.			
2.0 0/11/10 5 cm Mu	cky Peat or Peat (S3)	(MLRA 72 & 73 of LRR H)			10)	unless distur	ped or problematic			
Restrictive L	ayer (if observed):	<u>, (</u> ,								
Type:										
Depth (inc	hes):						Hvdric Soil Prese	nt? Yes No X		
Pomarke:	/						,			

Wetland Hydrology Indicators:	
Primary Indicators (minimum of one is required; check all that apply)	Secondary Indicators (minimum of two required)
Surface Water (A1)       Salt Crust (B11)         High Water Table (A2)       Aquatic Invertebrates (B13)         Saturation (A3)       Hydrogen Sulfide Odor (C1)         Water Marks (B1)       Dry-Season Water Table (C2)         Sediment Deposits (B2)       Oxidized Rhizospheres on Living R         Drift Deposits (B3)       (where not tilled)         Algal Mat or Crust (B4)       Presence of Reduced Iron (C4)         Iron Deposits (B5)       Thin Muck Surface (C7)         Inundation Visible on Aerial Imagery (B7)       Other (Explain in Remarks)	<ul> <li>Surface Soil Cracks (B6)</li> <li>Sparsely Vegetated Concave Surface (B8)</li> <li>Drainage Patterns (B10)</li> <li>Oxidized Rhizospheres on Living Roots (C3)</li> <li>(where tilled)</li> <li>Crayfish Burrows (C8)</li> <li>Saturation Visible on Aerial Imagery (C9)</li> <li>Geomorphic Position (D2)</li> <li>FAC-Neutral Test (D5)</li> </ul>
Water-Stained Leaves (B9)	Frost-Heave Hummocks (D7) (LRR F)
Surface Water Present?       Yes No _X_ Depth (inches):         Water Table Present?       Yes No _X_ Depth (inches):         Saturation Present?       Yes No _X_ Depth (inches):         (includes capillary fringe)       Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspection         Remarks:       Remarks:	Wetland Hydrology Present? Yes No _X ions), if available:

Project/Site: <u>Sam Houston National Cemetery</u>	City/County: San Antonio		Sampling Date: <u>10/1/2019</u>
Applicant/Owner: Department of Veterans Affairs		State: <u>TX</u>	Sampling Point: <u>WL06</u>
Investigator(s): <u>Blake Ellett, Mary Kate Stranix</u>	Section, Township, Range:		
Landform (hillslope, terrace, etc.): <u>depression</u>	_ Local relief (concave, conv	ex, none): <u>concave</u>	Slope (%): 2
Subregion (LRR): LRR I Lat: 29.476298	Long: <u>-98.4119</u>	10	Datum: NAD 1983
Soil Map Unit Name: Fr-Loire clay loam, 0-2% slopes, occasionally fl	ooded (hydric)	NWI classification	n: PFO1A
Are climatic / hydrologic conditions on the site typical for this time of ye	ear? Yes <u>X</u> No	(If no, explain in Re	marks.)
Are Vegetation Soil _X, or Hydrology _X significantl	y disturbed? Are "Norma	al Circumstances" pre	esent? Yes X No
Are Vegetation Soil, or Hydrology naturally p	roblematic? (If needed,	explain any answers	in Remarks.)
SUMMARY OF FINDINGS – Attach site map showing	sampling point location	ons, transects,	important features, etc.

Hydrophytic Vegetation Present? Hydric Soil Present? Wetland Hydrology Present?	Yes <u>X</u> Yes <u>X</u> Yes <u>X</u>	No No No	Is the Sampled Area within a Wetland?	Yes _	x	No	
Remarks: Soil has been displaced in the formation of berms. Area disturbed by past land use practices.							

	Absolute Do	minant Indicator	Dominance Test worksheet:
<u>Tree Stratum</u> (Plot size: <u>30 sq ft</u> )	<u>% Cover</u> S	pecies? <u>Status</u>	Number of Dominant Species
1. <u>Populus deltoides</u>	45	FAC	That Are OBL, FACW, or FAC
2. <u>Acer negundo</u>	30	FAC	(excluding FAC-):4 (A)
3. <u>Ulmus crassifolia</u>	15	FAC	Total Number of Dominant
4. <u>Celtis laevigata</u>	15	FAC	Species Across All Strata: (B)
5.			Percent of Dominant Species
	105	= Total Cover	That Are OBL, FACW, or FAC: <u>100%</u> (A/B)
Sapling/Shrub Stratum (Plot size: 30 sq ft )			
1			Prevalence Index worksheet:
2			Total % Cover of:Multiply by:
3.			OBL species x 1 =
4			FACW species x 2 =
5			FAC species x 3 =
···	- <u> </u>	otal Cover	FACU species x 4 =
Herb Stratum (Plot size: <u>30 sq ft</u> )			UPL species x 5 =
1.			Column Totals: (A) (B)
2.	·		
3	·		Prevalence Index = B/A =
٥			Hydrophytic Vegetation Indicators:
+	· ·		<u>X</u> Dominance Test is >50%
5			Prevalence Index is ≤3.0 <sup>1</sup>
0			Morphological Adaptations <sup>1</sup> (Provide supporting
<i>I</i>		·	data in Remarks or on a separate sheet)
8			Problematic Hydrophytic Vegetation <sup>1</sup> (Explain)
9			
10			<sup>1</sup> Indicators of hydric soil and wetland hydrology must
	= To	tal Cover	be present, unless disturbed or problematic.
Woody Vine Stratum (Plot size: 30 sq ft )			
1			Hydrophytic
2			Vegetation Present? Ves X No
% Bare Ground in Herb Stratum <u>100</u>	105	= Total Cover	
Remarks: (Include photo numbers here or on a separate	sheet.)		

Sampling Point:

	epth Matrix Redox Features						
(inches)	Color (moist)	<u> </u>	olor (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>	Texture Remarks
0-5	10YR 3/1	90	7.5 YR 4/6	10	С	M/PL	clay loam
5-16	10YR 4/1	95	7.5YR 4/6	5	C	M/PL	silty clay loam
Type: C=Co	oncentration, D=Depl	etion, RM=Redu	uced Matrix, CS	=Covered	d or Coate	ed Sand G	irains. <sup>2</sup> Location: PL=Pore Lining, M=Matrix
Histosol Histic Ep Black Hi Hydroge Stratified 1 cm Mu X Deplete Thick Da Sandy M 2.5 cm M 5 cm Mu	(A1) oipedon (A2) istic (A3) en Sulfide (A4) d Layers (A5) <b>(LRR F</b> uck (A9) <b>(LRR F, G, F</b> ed Below Dark Surface ark Surface (A12) <i>M</i> ucky Mineral (S1) Mucky Peat or Peat (S3	) I) e (A11) 62) (LRR G, H) I) (LRR F)	Sandy G Sandy R Stripped Loamy M Loamy C Depleted Redox D Depleted Redox High Pla High Pla	Bleyed Ma Redox (S5 I Matrix (S Mucky Mir Bleyed Ma Ed Matrix ( Dark Surfa d Dark Surfa d Dark Surfa d Dark Surfa d Dark Surfa d Dark Surfa <b>2 &amp; 73 0</b>	trix (S4) ) 66) heral (F1) atrix (F2) (F3) (F3) cce (F6) rface (F7) ons (F8) essions (F <b>f LRR H)</b>	) (16)	<ul> <li>1 cm Muck (A9) (LRRI, J)</li> <li>Coast Prairie Redox (A16) (LRR F, G, H</li> <li>Dark Surface (S7) (LRR G)</li> <li>High Plains Depressions (F16)</li> <li>(LRRH outside of MLRA 72 &amp; 73)</li> <li>Reduced Vertic (F18)</li> <li>Red Parent Material (TF2)</li> <li>Other (Explain in Remarks)</li> <li><sup>3</sup>Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.</li> </ul>
Restrictive I	Layer (if observed):						Hydric Soil Present? Yes <u>X</u> No

Wetland Hydrology Indicators:		
Primary Indicators (minimum of one is required	Secondary Indicators (minimum of two required)	
Surface Water (A1)	Salt Crust (B11)	X Surface Soil Cracks (B6)
High Water Table (A2)	Aquatic Invertebrates (B13)	X Sparsely Vegetated Concave Surface (B8)
Saturation (A3)	Hydrogen Sulfide Odor (C1)	X Drainage Patterns (B10)
Water Marks (B1)	Dry-Season Water Table (C2)	<ul> <li>Oxidized Rhizospheres on Living Roots (C3)</li> </ul>
X Sediment Deposits (B2)	X Oxidized Rhizospheres on Living R	Roots (C3) (where tilled)
Drift Deposits (B3)	(where not tilled)	Crayfish Burrows (C8)
Algal Mat or Crust (B4)	Presence of Reduced Iron (C4)	Saturation Visible on Aerial Imagery (C9)
Iron Deposits (B5)	Thin Muck Surface (C7)	X Geomorphic Position (D2)
Inundation Visible on Aerial Imagery (B7)	Other (Explain in Remarks)	FAC-Neutral Test (D5)
X Water-Stained Leaves (B9)		Frost-Heave Hummocks (D7) (LRR F)
Field Observations:		
Surface Water Present? Yes No	X Depth (inches):	
Water Table Present? Yes No	X Depth (inches):	
Saturation Present? Yes <u>No</u> (includes capillary fringe)	X Depth (inches):	Wetland Hydrology Present? Yes X No
Describe Recorded Data (stream gauge, monit	oring well, aerial photos, previous inspec	ions), if available:
Remarks:		

Appendix C: Photographic Log

## **PHOTOGRAPHIC LOG**



Photograph 1: Stream 01 Date: 9/11/2019



Photograph 3: Stream 02 Date: 9/11/2019

> Fort Sam Houston Wetland Delineation San Antonio, Texas October 2019



Photograph 2: Stream 01 Date: 9/11/2019



Photograph 4: Stream 02 Date: 9/11/2019

## **PHOTOGRAPHIC LOG**



Photograph 5: Wetland 03 Date: 9/11/2019



Photograph 7: Wetland 04 Date: 9/11/2019

Fort Sam Houston Wetland Delineation San Antonio, Texas October 2019



Photograph 6: Wetland 03 Date: 9/11/2019



Photograph 8: Wetland 04 Date: 9/11/2019

## **PHOTOGRAPHIC LOG**



Photograph 9: Wetland 05 Date: 9/11/2019



Photograph 11: Wetland 06 Date: 10/1/2019

> Fort Sam Houston Wetland Delineation San Antonio, Texas October 2019



Photograph 10: Wetland 05 Date: 9/11/2019



Photograph 12: Wetland 06 Date: 10/1/2019



## United States Department of the Interior

FISH AND WILDLIFE SERVICE 10711 Burnet Road, Suite 200 Austin, Texas 78758



June 25, 2020

In Reply Refer To: Consultation No. 02ETAU00-2020-I-1120

Department of Veteran Affairs Office of Construction and Facilities Management Attn: Fernando L. Fernández 425 I Street, NW Suite 6W317D Washington, DC 20001

Mr. Fernández:

This responds to your May 15, 2020, request to initiate informal consultation for the phase 3 expansion of Fort Sam Houston National Cemetery, located at 1520 Harry Wurzbach Rd, San Antonio, Bexar County, Texas 78209. The Department of Veteran Affairs (VA) has submitted documentation to the U.S. Fish and Wildlife Service (Service) requesting concurrence that the proposed project may affect, but is not likely to adversely affect the federally endangered golden-cheeked warbler (*Setophega* [=*Dendroica*] *chrysoparia*; GCWA), listed pursuant to the Endangered Species Act of 1973, as amended (16 U.S.C.153 et seq., Act). We reviewed the other species listed in Table 1 of your May 15, 2020, request for initiation, and their ranges either do not occur in the project area, require consideration for wind projects only, or habitat is simply not present. Therefore, only the GCWA is considered herein.

The VA's proposed project includes adding burial capacity, repair and construction of resources across the cemetery, and expanding cemetery facilities by approximately 43 acres on the eastern side of the property. The project will include 30,013 gravesites, and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, continuing repairs to the perimeter stone wall, restoration of the rostrum, correct infrastructure deficiencies, extend the irrigation system, construct three buildings, vehicle storage, material storage, expansion and renovation of two buildings, access roads, and parking. The project area is VA owned and was historically used as U.S. Army training grounds. Most of the property is currently managed as cemetery grounds with some upland hardwood forest and shrub/scrubland.

## Conclusion

Based on the information provided we concur with the VA's determination that the project, as proposed, may affect but is not likely to adversely affect the GCWA. The project area is largely developed, with some portions of upland woodland habitat. However, the cemetery occurs within the highly developed Fort Sam Houston which is surrounded by metropolitan development. Therefore, we do not consider the area to contain suitable GCWA breeding and

nesting habitat, and subsequently any adverse effects to the species are not reasonably certain to occur.

No further endangered species consultation will be required unless: 1) the identified action is subsequently modified in a manner that causes an effect on a listed species; 2) new information reveals the identified action may affect federally protected species in a manner or to an extent not previously considered; or, 3) a new species is listed or critical habitat is designated that may be affected by the identified action. If new effects are identified in the future, the project proposal should be resubmitted to our office for further consideration.

We appreciate your efforts to conserve these sensitive species. If you have any questions or comments, please contact Jacob Ogdee at 512-490-0057 (ext. 243) or at jacob\_ogdee@fws.gov.

Sincerely,

Adam Zerrenner Field Supervisor

## **Eric Sautbine**

From: Sent: To: Subject: noreply@thc.state.tx.us Thursday, May 7, 2020 2:11 PM Eric Sautbine; reviews@thc.state.tx.us Project Review: 202011267



Re: Project Review under Section 106 of the National Historic Preservation Act and/or the Antiquities Code of Texas

#### **THC Tracking #202011267**

Fort Sam Houston National Cemetery, New building to replicate demolished bldg. 1002 and other work 1520 Harry Wurzbach Rd San Antonio,TX 78209

#### Dear Eric Sautbine:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act.

The review staff led by Emily Dylla, Caitlin Brashear and Pam Opiela has completed its review and has made the following determinations based on the information submitted for review:

## **Above-Ground Resources**

- Property/properties are eligible for listing or already listed in the National Register of Historic Places.
- THC/SHPO unable to complete review at this time based on insufficient documentation. A supplemental review must be submitted, and the 30-day review period will begin upon receipt of adequate documentation.

## **Archeology Comments**

• THC/SHPO concurs with information provided.

We have the following comments: This project submittal includes scope of work and preliminary construction documents regarding above ground work on a New Honor Guard Building. Work on the new Honor Guard Bldg. is to replicate the appearance of the Bldg. 1002 that was demolished. The work is to be carried out as stipulated in the 2017 amendment to the 2014 MOA regarding this project. Please send all information to our office for review under amended stipulation V of the amended MOA. The construction documents provided do not show reuse of salvaged materials as stipulated in the MOA. Please let us know if roof tiles and iron railings were salvaged from Bldg. 1002 to use on the New Honor Guard building, as stipulated in the amendment to the MOA. The MOA stipulates that you will trying to replicate the appearance and materials of Bldg. 1002 in the new Honor Guard House. The drawings you submitted do not show a replication of materials for the walls. Please submit plans and specifications for a traditional stucco walls system on the new building, along with stucco product information, if needed. Please send information on the landscape plans around the new building

as stipulated in the amendment. We received the preliminary attached construction documents for the New Honor Guard Builng, but please note that the amendment stipulates they be sent to not only the signatories, but also to consulting parties. Please contact Pam Opiela in the Division of Architecture (pamela.opiela@thc.texas.gov) to discuss information to be submitted for our review as specified in the amendment to the MOA.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this review process, and for your efforts to preserve the irreplaceable heritage of Texas. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: emily.dylla@thc.texas.gov, caitlin.brashear@thc.texas.gov, pamela.opiela@thc.texas.gov

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <u>http://thc.texas.gov/etrac-system</u>.

Sincerely,

AL

For Mark Wolfe, State Historic Preservation Officer Executive Director, Texas Historical Commission

Please do not respond to this email.



DEPARTMENT OF THE ARMY U.S. ARMY CORPS OF ENGINEERS, FORT WORTH DISTRICT P. O. BOX 17300 FORT WORTH, TEXAS 76102-0300

October 15, 2020

**Regulatory Division** 

SUBJECT: Project Number SWF-2019-00446, Expansion of Fort Sam Houston National Cemetery

Mr. Fernando L. Fernandez U.S. Department of Veterans Affairs Office of Construction & Facilities Management 425 I Street, NW, Room 6W417a Washington, DC 20001 fernando.fernandez@va.gov

Dear Mr. Fernandez:

This letter is in regard to information received September 17, 2020, concerning a proposal by the Department of Veterans Affairs to expand the Fort Sam Houston National Cemetery in the city of San Antonio, Bexar County, Texas. This project has been assigned Project Number SWF-2019-00446. Please include this number in all future correspondence concerning this project.

Under Section 404 of the Clean Water Act the U.S. Army Corps of Engineers (USACE) regulates the discharge of dredged and fill material into waters of the United States, including wetlands. USACE responsibility under Section 10 of the Rivers and Harbors Act of 1899 is to regulate any work in, or affecting, navigable waters of the United States. Based on your description of the proposed work, and other information available to us, we have determined this project will not involve activities subject to the requirements of Section 404 or Section 10. Therefore, it will not require Department of the Army authorization pursuant to Section 404 and/or Section 10.

Thank you for your interest in our nation's water resources. If you have any questions concerning our regulatory program, please refer to our website at <a href="http://www.swf.usace.army.mil/Missions/Regulatory">http://www.swf.usace.army.mil/Missions/Regulatory</a> or contact Mr. Eric Dephouse at the address above, by telephone (817) 886-1820, or by email Eric.J.Dephouse@usace.army.mil, and refer to your assigned project number.

Please help the regulatory program improve its service by completing the survey on the following website: <u>http://corpsmapu.usace.army.mil/cm\_apex/f?p=regulatory\_survey</u>

Sincerely,

For: Brandon W. Mobley Chief, Regulatory Division **Appendix C: Tribal Consultation** 



December 31, 2019

Linda Langley, Tribal Historical Preservation Officer Coushatta Tribe of Louisiana PO Box 10 Elton, Louisiana 70532

## Subject: Initiation of Section 106 Consultation for the Proposed Phase 3 Site Expansion and Improvement of the Fort Sam Houston National Cemetery

Dear Linda Langley,

Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations 36 Code of Federal Regulations (CFR) Part 800, the U.S. Department of Veterans Affairs (VA) is proposing to construct and operate a Phased expansion within an approximately 43-acre area in the existing Fort Sam Houston National Cemetery (FSHNC) located at 1520 Harry Wurzbach Road (see enclosed map). The National Cemetery Administration (NCA) is conducting this cemetery expansion project to increase burial capacity at FSHNC, which serves Veterans and their eligible family members in south central Texas.

#### **Background**

The Fort Sam Houston National Cemetery (FSHNC) is located within the city limits of San Antonio at 1520 Harry Wurzbach Road, adjacent to the Fort Sam Houston Joint Base San Antonio. The FSHNC was created by the US Army in 1921. In 1931, it was designated a National Cemetery and formally named by Congressional Order Number 6 on August 4, 1937.

In 1994, the VA sought out to gain new land to further expand the FSHNC. Approximately 150 acres of land previously owned by the US Army was transferred to VA ownership. Since then, a Phase One expansion and Phase Two restoration of historic resources has been completed. This Phase 3 cemetery expansion and restoration utilizes parts of the lands acquired from the US Army.

#### **Undertaking**

The NCA's mission is to honor 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. As the FSHNC available internment spaces continue to decrease, FSHNC will not be able support burial requests and provide sufficient onsite parking to support the needs of Veterans, family members, and staff. The future development within the 43-acre area is needed to fulfill this mission.

Due to gravesite depletion, FSHNC requires additional burial capacity to serve veterans in the south-central Texas region. The purpose of the Project is to continue to enable the VA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs of the region for the next 15 years. The proposed Project sets out to repair and construct resources across the cemetery and expand cemetery facilities by approximately 43 acres on the eastern side of the property which were previously disturbed by US Army operations and currently undeveloped and vegetated. This project represents a continuation of a planned and anticipated multi-phase cemetery build out and no new property would need to be acquired. The Project will include 30,013 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, continuing repairs to the perimeter stone wall, restoration of the rostrum, correct infrastructure deficiencies, extend the irrigation system, construct three buildings including the new honor guard building, a vehicle storage, and a material storage; expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking. The historic stone wall entrance on the west side of the property was repaired in 2015 as laid out in the 2014 PA following SHPO stipulations to maintain historic value and aesthetic. Phase three would repair sections of the wall running south west off Harry Wurzbach Rd. for 280 linear feet and the portion paralleling Harry Wurzbach Road for approximately 1,225 linear feet. Approximately 1,400 linear feet paralleling the south side of Winans Rd. is planned to be replaced with ornamental fence with intermediate columns if found to not be historic.

The rostrum west of Harry Wurzbach Rd. and south of San Antonio Blvd. will also need repair to prolong the life of the structure. The new honor guard building was identified in the 2014 PA and 2017 amendments and is a continuation of the Phase Two project.

#### Area of Potential Effect

The Area of Potential Effect (APE) is shown in Figure A – Project Overview and defined as the highlighted 43 acres East and West within the FSHNC boundaries.

#### Identification of Historic Properties

Three archeological surveys were conducted between 1978 and 1988 at the FSHNC. Three archeological sites were recorded within the parcel but consultation with the TX SHPO concurred that none of these sites were eligible for the NRHP.

The VA recently completed an additional Cultural Resource Assessment on October 2<sup>nd</sup>, 2019. The review of the restricted-access state database of recorded cultural resources indicated that portions of the study area had been investigated during the past 42 years. Archaeological investigations undertaken in 1977 and 2017 were performed in support of the development and expansion for the cemetery. The remaining surveys (2000, 2014, and 2018) in the area were in support of road infrastructure and the development of the Salado Creek trail system. Most of these study areas remain undeveloped; however, there has been continuous development of the cemetery complex to the west and in the surrounding northern parcels of the Fort Sam Houston property. The Fort Sam Houston National Cemetery was listed in the National Registry of Historic Places in 2016 individually and as a contributing feature of the Inter-World War National Cemeteries, 1934-1939.

VA also notes that should future construction activities uncover any archaeological remains, the activity in the immediate area will be stopped, while a professional archaeologist evaluates the remains.

#### **Determination of Findings**

The VA requests that the Coushatta Tribe of Louisiana reply to this invitation indicating if it would like to participate as a consulting party in this ongoing federal review of the proposed undertaking.

If you have any questions or comments, or would like to be included as a consulting party; please do not hesitate to contact William Hooker for additional information at William.hooker@va.gov or (202) 632-6631.

Sincerely,

W. Edward Hooker, III Historic Architect/Cultural Resources Manager U.S. Department of Veterans Affairs National Cemetery Administration Design and Construction Service

Attachments:

A. Area of Potential Effect

CC: Douglas Pulak, Federal Preservation Officer, U.S. Department of Veterans Affairs Fernando Fernandez, Environmental Engineer, U.S. Department of Veterans Affairs Stephanie Birdwell, Tribal Liaison Officer, U.S. Department of Veterans Affairs



DEPARTMENT OF VETERANS AFFAIRS NATIONAL CEMETERY ADMINISTRATION Design and Construction Service Washington DC 20420

December 31, 2019

Ms. Martina Callahan Comanche Nation 6 SW D Avenue Lawton, Oklahoma 73502

## Subject: Initiation of Section 106 Consultation for the Proposed Phase 3 Site Expansion and Improvement of the Fort Sam Houston National Cemetery

Dear Martina Callahan,

Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations 36 Code of Federal Regulations (CFR) Part 800, the U.S. Department of Veterans Affairs (VA) is proposing to construct and operate a Phased expansion within an approximately 43-acre area in the existing Fort Sam Houston National Cemetery (FSHNC) located at 1520 Harry Wurzbach Road (see enclosed map). The National Cemetery Administration (NCA) is conducting this cemetery expansion project to increase burial capacity at FSHNC, which serves Veterans and their eligible family members in south central Texas.

#### **Background**

The Fort Sam Houston National Cemetery (FSHNC) is located within the city limits of San Antonio at 1520 Harry Wurzbach Road, adjacent to the Fort Sam Houston Joint Base San Antonio. The FSHNC was created by the US Army in 1921. In 1931, it was designated a National Cemetery and formally named by Congressional Order Number 6 on August 4, 1937.

In 1994, the VA sought out to gain new land to further expand the FSHNC. Approximately 150 acres of land previously owned by the US Army was transferred to VA ownership. Since then, a Phase One expansion and Phase Two restoration of historic resources has been completed. This Phase 3 cemetery expansion and restoration utilizes parts of the lands acquired from the US Army.

#### **Undertaking**

The NCA's mission is to honor 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. As the FSHNC available internment spaces continue to decrease, FSHNC will not be able support burial requests and provide sufficient onsite parking to support the needs of Veterans, family members, and staff. The future development within the 43-acre area is needed to fulfill this mission.

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The VA recently completed an additional Cultural Resource Assessment on October 2<sup>nd</sup>, 2019. The review of the restricted-access state database of recorded cultural resources indicated that portions of the study area had been investigated during the past 42 years. Archaeological investigations undertaken in 1977 and 2017 were performed in support of the development and expansion for the cemetery. The remaining surveys (2000, 2014, and 2018) in the area were in support of road infrastructure and the development of the Salado Creek trail system. Most of these study areas remain undeveloped; however, there has been continuous development of the cemetery complex to the west and in the surrounding northern parcels of the Fort Sam Houston property. The Fort Sam Houston National Cemetery was listed in the National Registry of Historic Places in 2016 individually and as a contributing feature of the Inter-World War National Cemeteries, 1934-1939.

VA also notes that should future construction activities uncover any archaeological remains, the activity in the immediate area will be stopped, while a professional archaeologist evaluates the remains.

#### **Determination of Findings**

The VA requests that the Comanche Nation reply to this invitation indicating if it would like to participate as a consulting party in this ongoing federal review of the proposed undertaking.

If you have any questions or comments, or would like to be included as a consulting party; please do not hesitate to contact William Hooker for additional information at William.hooker@va.gov or (202) 632-6631.

Sincerely,

W. Edward Hooker, III Historic Architect/Cultural Resources Manager U.S. Department of Veterans Affairs National Cemetery Administration Design and Construction Service

Attachments:

A. Area of Potential Effect

CC: Douglas Pulak, Federal Preservation Officer, U.S. Department of Veterans Affairs Fernando Fernandez, Environmental Engineer, U.S. Department of Veterans Affairs Stephanie Birdwell, Tribal Liaison Officer, U.S. Department of Veterans Affairs



December 31, 2019

Ms. Holly Houghten Mescalero Apache Tribe of the Mescalero Reservation PO Box 227 Mescalero, New Mexico 88340

# Subject: Initiation of Section 106 Consultation for the Proposed Phase 3 Site Expansion and Improvement of the Fort Sam Houston National Cemetery

Dear Holly Houghten,

Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations 36 Code of Federal Regulations (CFR) Part 800, the U.S. Department of Veterans Affairs (VA) is proposing to construct and operate a Phased expansion within an approximately 43-acre area in the existing Fort Sam Houston National Cemetery (FSHNC) located at 1520 Harry Wurzbach Road (see enclosed map). The National Cemetery Administration (NCA) is conducting this cemetery expansion project to increase burial capacity at FSHNC, which serves Veterans and their eligible family members in south central Texas.

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In 1994, the VA sought out to gain new land to further expand the FSHNC. Approximately 150 acres of land previously owned by the US Army was transferred to VA ownership. Since then, a Phase One expansion and Phase Two restoration of historic resources has been completed. This Phase 3 cemetery expansion and restoration utilizes parts of the lands acquired from the US Army.

#### **Undertaking**

The NCA's mission is to honor 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. As the FSHNC available internment spaces continue to decrease, FSHNC will not be able support burial requests and provide sufficient onsite parking to support the needs of Veterans, family members, and staff. The future development within the 43-acre area is needed to fulfill this mission.

Due to gravesite depletion, FSHNC requires additional burial capacity to serve veterans in the south-central Texas region. The purpose of the Project is to continue to enable the VA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs of the region for the next 15 years. The proposed Project sets out to repair and construct resources across the cemetery and expand cemetery facilities by approximately 43 acres on the eastern side of the property which were previously disturbed by US Army operations and currently undeveloped and vegetated. This project represents a continuation of a planned and anticipated multi-phase cemetery build out and no new property would need to be acquired. The Project will include 30,013 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, continuing repairs to the perimeter stone wall, restoration of the rostrum, correct infrastructure deficiencies, extend the irrigation system, construct three buildings including the new honor guard building, a vehicle storage, and a material storage; expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking. The historic stone wall entrance on the west side of the property was repaired in 2015 as laid out in the 2014 PA following SHPO stipulations to maintain historic value and aesthetic. Phase three would repair sections of the wall running south west off Harry Wurzbach Rd. for 280 linear feet and the portion paralleling Harry Wurzbach Road for approximately 1,225 linear feet. Approximately 1,400 linear feet paralleling the south side of Winans Rd. is planned to be replaced with ornamental fence with intermediate columns if found to not be historic.

The rostrum west of Harry Wurzbach Rd. and south of San Antonio Blvd. will also need repair to prolong the life of the structure. The new honor guard building was identified in the 2014 PA and 2017 amendments and is a continuation of the Phase Two project.

#### Area of Potential Effect

The Area of Potential Effect (APE) is shown in Figure A – Project Overview and defined as the highlighted 43 acres East and West within the FSHNC boundaries.

#### Identification of Historic Properties

Three archeological surveys were conducted between 1978 and 1988 at the FSHNC. Three archeological sites were recorded within the parcel but consultation with the TX SHPO concurred that none of these sites were eligible for the NRHP.

The VA recently completed an additional Cultural Resource Assessment on October 2<sup>nd</sup>, 2019. The review of the restricted-access state database of recorded cultural resources indicated that portions of the study area had been investigated during the past 42 years. Archaeological investigations undertaken in 1977 and 2017 were performed in support of the development and expansion for the cemetery. The remaining surveys (2000, 2014, and 2018) in the area were in support of road infrastructure and the development of the Salado Creek trail system. Most of these study areas remain undeveloped; however, there has been continuous development of the cemetery complex to the west and in the surrounding northern parcels of the Fort Sam Houston property. The Fort Sam Houston National Cemetery was listed in the National Registry of Historic Places in 2016 individually and as a contributing feature of the Inter-World War National Cemeteries, 1934-1939.

VA also notes that should future construction activities uncover any archaeological remains, the activity in the immediate area will be stopped, while a professional archaeologist evaluates the remains.

#### **Determination of Findings**

The VA requests that the Mescalero Apache Tribe of the Mescalero Reservation reply to this invitation indicating if it would like to participate as a consulting party in this ongoing federal review of the proposed undertaking.

If you have any questions or comments, or would like to be included as a consulting party; please do not hesitate to contact William Hooker for additional information at William.hooker@va.gov or (202) 632-6631.

Sincerely,

W. Edward Hooker, III Historic Architect/Cultural Resources Manager U.S. Department of Veterans Affairs National Cemetery Administration Design and Construction Service

Attachments:

A. Area of Potential Effect

CC: Douglas Pulak, Federal Preservation Officer, U.S. Department of Veterans Affairs Fernando Fernandez, Environmental Engineer, U.S. Department of Veterans Affairs Stephanie Birdwell, Tribal Liaison Officer, U.S. Department of Veterans Affairs


DEPARTMENT OF VETERANS AFFAIRS NATIONAL CEMETERY ADMINISTRATION Design and Construction Service Washington DC 20420

December 31, 2019

Chairman Lyman Guy Apache Tribe PO Box 1330 Anadarko, Oklahoma 73005

# Subject: Initiation of Section 106 Consultation for the Proposed Phase 3 Site Expansion and Improvement of the Fort Sam Houston National Cemetery

Dear Lyman Guy,

Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations 36 Code of Federal Regulations (CFR) Part 800, the U.S. Department of Veterans Affairs (VA) is proposing to construct and operate a Phased expansion within an approximately 43-acre area in the existing Fort Sam Houston National Cemetery (FSHNC) located at 1520 Harry Wurzbach Road (see enclosed map). The National Cemetery Administration (NCA) is conducting this cemetery expansion project to increase burial capacity at FSHNC, which serves Veterans and their eligible family members in south central Texas.

### **Background**

The Fort Sam Houston National Cemetery (FSHNC) is located within the city limits of San Antonio at 1520 Harry Wurzbach Road, adjacent to the Fort Sam Houston Joint Base San Antonio. The FSHNC was created by the US Army in 1921. In 1931, it was designated a National Cemetery and formally named by Congressional Order Number 6 on August 4, 1937.

In 1994, the VA sought out to gain new land to further expand the FSHNC. Approximately 150 acres of land previously owned by the US Army was transferred to VA ownership. Since then, a Phase One expansion and Phase Two restoration of historic resources has been completed. This Phase 3 cemetery expansion and restoration utilizes parts of the lands acquired from the US Army.

### **Undertaking**

The NCA's mission is to honor 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. As the FSHNC available internment spaces continue to decrease, FSHNC will not be able support burial requests and provide sufficient onsite parking to support the needs of Veterans, family members, and staff. The future development within the 43-acre area is needed to fulfill this mission.

Due to gravesite depletion, FSHNC requires additional burial capacity to serve veterans in the south-central Texas region. The purpose of the Project is to continue to enable the VA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs of the region for the next 15 years. The proposed Project sets out to repair and construct resources across the cemetery and expand cemetery facilities by approximately 43 acres on the eastern side of the property which were previously disturbed by US Army operations and currently undeveloped and vegetated. This project represents a continuation of a planned and anticipated multi-phase cemetery build out and no new property would need to be acquired. The Project will include 30,013 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, continuing repairs to the perimeter stone wall, restoration of the rostrum, correct infrastructure deficiencies, extend the irrigation system, construct three buildings including the new honor guard building, a vehicle storage, and a material storage; expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking. The historic stone wall entrance on the west side of the property was repaired in 2015 as laid out in the 2014 PA following SHPO stipulations to maintain historic value and aesthetic. Phase three would repair sections of the wall running south west off Harry Wurzbach Rd. for 280 linear feet and the portion paralleling Harry Wurzbach Road for approximately 1,225 linear feet. Approximately 1,400 linear feet paralleling the south side of Winans Rd. is planned to be replaced with ornamental fence with intermediate columns if found to not be historic.

The rostrum west of Harry Wurzbach Rd. and south of San Antonio Blvd. will also need repair to prolong the life of the structure. The new honor guard building was identified in the 2014 PA and 2017 amendments and is a continuation of the Phase Two project.

### Area of Potential Effect

The Area of Potential Effect (APE) is shown in Figure A – Project Overview and defined as the highlighted 43 acres East and West within the FSHNC boundaries.

### Identification of Historic Properties

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The VA recently completed an additional Cultural Resource Assessment on October 2<sup>nd</sup>, 2019. The review of the restricted-access state database of recorded cultural resources indicated that portions of the study area had been investigated during the past 42 years. Archaeological investigations undertaken in 1977 and 2017 were performed in support of the development and expansion for the cemetery. The remaining surveys (2000, 2014, and 2018) in the area were in support of road infrastructure and the development of the Salado Creek trail system. Most of these study areas remain undeveloped; however, there has been continuous development of the cemetery complex to the west and in the surrounding northern parcels of the Fort Sam Houston property. The Fort Sam Houston National Cemetery was listed in the National Registry of Historic Places in 2016 individually and as a contributing feature of the Inter-World War National Cemeteries, 1934-1939.

VA also notes that should future construction activities uncover any archaeological remains, the activity in the immediate area will be stopped, while a professional archaeologist evaluates the remains.

### **Determination of Findings**

The VA requests that the Apache Tribe reply to this invitation indicating if it would like to participate as a consulting party in this ongoing federal review of the proposed undertaking.

If you have any questions or comments, or would like to be included as a consulting party; please do not hesitate to contact William Hooker for additional information at William.hooker@va.gov or (202) 632-6631.

Sincerely,

W. Edward Hooker, III Historic Architect/Cultural Resources Manager U.S. Department of Veterans Affairs National Cemetery Administration Design and Construction Service

Attachments:

A. Area of Potential Effect

CC: Douglas Pulak, Federal Preservation Officer, U.S. Department of Veterans Affairs Fernando Fernandez, Environmental Engineer, U.S. Department of Veterans Affairs Stephanie Birdwell, Tribal Liaison Officer, U.S. Department of Veterans Affairs



December 31, 2019

Mr. Gary McAdams Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie) PO Box 729 Anadarko, Oklahoma 73005

# Subject: Initiation of Section 106 Consultation for the Proposed Phase 3 Site Expansion and Improvement of the Fort Sam Houston National Cemetery

Dear Gary McAdams,

Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations 36 Code of Federal Regulations (CFR) Part 800, the U.S. Department of Veterans Affairs (VA) is proposing to construct and operate a Phased expansion within an approximately 43-acre area in the existing Fort Sam Houston National Cemetery (FSHNC) located at 1520 Harry Wurzbach Road (see enclosed map). The National Cemetery Administration (NCA) is conducting this cemetery expansion project to increase burial capacity at FSHNC, which serves Veterans and their eligible family members in south central Texas.

### **Background**

The Fort Sam Houston National Cemetery (FSHNC) is located within the city limits of San Antonio at 1520 Harry Wurzbach Road, adjacent to the Fort Sam Houston Joint Base San Antonio. The FSHNC was created by the US Army in 1921. In 1931, it was designated a National Cemetery and formally named by Congressional Order Number 6 on August 4, 1937.

In 1994, the VA sought out to gain new land to further expand the FSHNC. Approximately 150 acres of land previously owned by the US Army was transferred to VA ownership. Since then, a Phase One expansion and Phase Two restoration of historic resources has been completed. This Phase 3 cemetery expansion and restoration utilizes parts of the lands acquired from the US Army.

### **Undertaking**

The NCA's mission is to honor 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. As the FSHNC available internment spaces continue to decrease, FSHNC will not be able support burial requests and provide sufficient onsite parking to support the needs of Veterans, family members, and staff. The future development within the 43-acre area is needed to fulfill this mission.

Due to gravesite depletion, FSHNC requires additional burial capacity to serve veterans in the south-central Texas region. The purpose of the Project is to continue to enable the VA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs of the region for the next 15 years. The proposed Project sets out to repair and construct resources across the cemetery and expand cemetery facilities by approximately 43 acres on the eastern side of the property which were previously disturbed by US Army operations and currently undeveloped and vegetated. This project represents a continuation of a planned and anticipated multi-phase cemetery build out and no new property would need to be acquired. The Project will include 30,013 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, continuing repairs to the perimeter stone wall, restoration of the rostrum, correct infrastructure deficiencies, extend the irrigation system, construct three buildings including the new honor guard building, a vehicle storage, and a material storage; expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking. The historic stone wall entrance on the west side of the property was repaired in 2015 as laid out in the 2014 PA following SHPO stipulations to maintain historic value and aesthetic. Phase three would repair sections of the wall running south west off Harry Wurzbach Rd. for 280 linear feet and the portion paralleling Harry Wurzbach Road for approximately 1,225 linear feet. Approximately 1,400 linear feet paralleling the south side of Winans Rd. is planned to be replaced with ornamental fence with intermediate columns if found to not be historic.

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### Area of Potential Effect

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### Identification of Historic Properties

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VA also notes that should future construction activities uncover any archaeological remains, the activity in the immediate area will be stopped, while a professional archaeologist evaluates the remains.

### **Determination of Findings**

The VA requests that the Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie) reply to this invitation indicating if it would like to participate as a consulting party in this ongoing federal review of the proposed undertaking.

If you have any questions or comments, or would like to be included as a consulting party; please do not hesitate to contact William Hooker for additional information at William.hooker@va.gov or (202) 632-6631.

Sincerely,

W. Edward Hooker, III Historic Architect/Cultural Resources Manager U.S. Department of Veterans Affairs National Cemetery Administration Design and Construction Service

Attachments:

A. Area of Potential Effect

CC: Douglas Pulak, Federal Preservation Officer, U.S. Department of Veterans Affairs Fernando Fernandez, Environmental Engineer, U.S. Department of Veterans Affairs Stephanie Birdwell, Tribal Liaison Officer, U.S. Department of Veterans Affairs



December 31, 2019

Ms. Lauren Norman-Brown Tonkawa Tribe of Indians of Oklahoma 1 Rush Buffalo Road Tonkawa, Oklahoma 74653

# Subject: Initiation of Section 106 Consultation for the Proposed Phase 3 Site Expansion and Improvement of the Fort Sam Houston National Cemetery

Dear Lauren Norman-Brown,

Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations 36 Code of Federal Regulations (CFR) Part 800, the U.S. Department of Veterans Affairs (VA) is proposing to construct and operate a Phased expansion within an approximately 43-acre area in the existing Fort Sam Houston National Cemetery (FSHNC) located at 1520 Harry Wurzbach Road (see enclosed map). The National Cemetery Administration (NCA) is conducting this cemetery expansion project to increase burial capacity at FSHNC, which serves Veterans and their eligible family members in south central Texas.

### **Background**

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In 1994, the VA sought out to gain new land to further expand the FSHNC. Approximately 150 acres of land previously owned by the US Army was transferred to VA ownership. Since then, a Phase One expansion and Phase Two restoration of historic resources has been completed. This Phase 3 cemetery expansion and restoration utilizes parts of the lands acquired from the US Army.

### **Undertaking**

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### Identification of Historic Properties

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VA also notes that should future construction activities uncover any archaeological remains, the activity in the immediate area will be stopped, while a professional archaeologist evaluates the remains.

### **Determination of Findings**

The VA requests that the Tonkawa Tribe of Indians of Oklahoma reply to this invitation indicating if it would like to participate as a consulting party in this ongoing federal review of the proposed undertaking.

If you have any questions or comments, or would like to be included as a consulting party; please do not hesitate to contact William Hooker for additional information at William.hooker@va.gov or (202) 632-6631.

Sincerely,

W. Edward Hooker, III Historic Architect/Cultural Resources Manager U.S. Department of Veterans Affairs National Cemetery Administration Design and Construction Service

Attachments:

A. Area of Potential Effect

CC: Douglas Pulak, Federal Preservation Officer, U.S. Department of Veterans Affairs Fernando Fernandez, Environmental Engineer, U.S. Department of Veterans Affairs Stephanie Birdwell, Tribal Liaison Officer, U.S. Department of Veterans Affairs



DEPARTMENT OF VETERANS AFFAIRS NATIONAL CEMETERY ADMINISTRATION Design and Construction Service Washington DC 20420

December 31, 2019

Mr. Bryant Celestine Alabama-Coushatta Tribe of Texas 571 State Park Road 56 Livingston, Texas 77351

# Subject: Initiation of Section 106 Consultation for the Proposed Phase 3 Site Expansion and Improvement of the Fort Sam Houston National Cemetery

Dear Bryant Celestine,

Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations 36 Code of Federal Regulations (CFR) Part 800, the U.S. Department of Veterans Affairs (VA) is proposing to construct and operate a Phased expansion within an approximately 43-acre area in the existing Fort Sam Houston National Cemetery (FSHNC) located at 1520 Harry Wurzbach Road (see enclosed map). The National Cemetery Administration (NCA) is conducting this cemetery expansion project to increase burial capacity at FSHNC, which serves Veterans and their eligible family members in south central Texas.

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VA also notes that should future construction activities uncover any archaeological remains, the activity in the immediate area will be stopped, while a professional archaeologist evaluates the remains.

### **Determination of Findings**

The VA requests that the Alabama-Coushatta Tribe of Texas reply to this invitation indicating if it would like to participate as a consulting party in this ongoing federal review of the proposed undertaking.

If you have any questions or comments, or would like to be included as a consulting party; please do not hesitate to contact William Hooker for additional information at William.hooker@va.gov or (202) 632-6631.

Sincerely,

W. Edward Hooker, III Historic Architect/Cultural Resources Manager U.S. Department of Veterans Affairs National Cemetery Administration Design and Construction Service

Attachments:

A. Area of Potential Effect

CC: Douglas Pulak, Federal Preservation Officer, U.S. Department of Veterans Affairs Fernando Fernandez, Environmental Engineer, U.S. Department of Veterans Affairs Stephanie Birdwell, Tribal Liaison Officer, U.S. Department of Veterans Affairs



### Fort Sam Houston National Cemetery Bexar County, TX

### Figure A Project Overview



#### Project Area West Actions:

- 1. Rehab existing roads
- 2. Repair/replace stone perimeter wall
- 3. Remodel interior of Public Information Center (PIC)
- 4. Expand parking area for PIC (14 stalls)
- 5. New Honor Guard building (1,238 s.f.)
- 6. Repair Rostrum and concrete walk

#### Project Area East Actions:

- 1. New Equipment Storage building (2,320 s.f.)
- 2. New Material Storage building (800 s.f.)
- 3. Administration building expansion (2,792 s.f.)
- 4. New access road
- 5. New Columbaria
- 6. New Gravesite area with roads



SOURCE: TxDNR, USDA, ESRI, TIGER, Bing, Bexar Co., Anderson Engineering

From: Raynella D, Fontenet < <u>ROFontenet/Octous Justis, serpe</u> Sents Monday, December 16, 2019 4435 PM To: Fernandez, Fernande L. (CFM) <<u>Sernandez/Fe</u>

Dear Mr. Fernandez,

Thank you for requesting our 106 EA determination. Based on the information provided, I do not believe that this project will have a negative impact on any archaeological, historic or cultural resources of the Coushatta people. Accordingly, we do not wish to consult further on this project. If any inadvertent discoveries are made in the course of this project, we expect to be contacted immediately and reserve the right to consult with you at that time.

Aliilamo (thank you),

Raynella Fontenot

Coushatta Revitalization Coordinator

Acting Section 106 Coordinator

Coushatta Tribe of Louisiana

P.O. Box 10

Elton, LA 70532

337-584-1585

# COMANCHE NATION



Department of Veterans Affairs National Cemetery Administration Design and Construction Services ATT: W. Edward Hooker, III Washington, DC 20420

February 21, 2020

RE: Fort Sam Houston National Cemetery Proposed Phase 3 Site Expansion and Improvement

Dear Mr. Hooker,

In response to your request, the above reference project has been reviewed by staff of this office to identify areas that may potentially contain prehistoric or historic archeological materials. The location of your project has been cross referenced with the Comanche Nation site files, where an indication of "*No Properties*" have been identified. (IAW 36 CFR 800.4(d)(1)).

This review is performed in order to identify and preserve the Comanche Nation and State cultural heritage, in conjunction with the State Historic Preservation Office. Please contact the Comanche Nation Tribal Historical Preservation Office at (580) 595-9618, if you require additional information on this project.

Best Regards,

Martina Minthorn

Comanche Nation Historic Preservation Office Martina Minthorn, Tribal Historic Preservation Officer #6 SW "D" Avenue, Suite C Lawton, OK. 73501 <u>martina.minthorn@comanchnation.com</u> (580) 595-9618/Fax (580) 595-9733

"To preserve historic and sacred landmarks of the Comanche Nation"

COMANCHE NATION P.O. BOX 908 / LAWTON, OK 73502 PHONE: 580-492-4988 TOLL FREE:1-877-492-4988 **Appendix D: SHPO Consultation** 



January 16, 2020

Mark Wolfe, Executive Director Texas Historical Commission P.O. Box 12276 Austin, Texas 78711

# Subject: Initiation of Section 106 Consultation for the Proposed Phase 3 Site Expansion and Improvement of the Fort Sam Houston National Cemetery

Dear Director Wolfe,

Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations 36 Code of Federal Regulations (CFR) Part 800, the U.S. Department of Veterans Affairs (VA) is proposing to construct and operate a Phased expansion within an approximately 43-acre area in the existing Fort Sam Houston National Cemetery (FSHNC) located at 1520 Harry Wurzbach Road (see enclosed map). The National Cemetery Administration (NCA) is conducting this cemetery expansion project to increase burial capacity at FSHNC, which serves Veterans and their eligible family members in south central Texas.

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In 2001, approximately 150 acres of land previously owned by the US Army was transferred to VA ownership. In 2009, the Phase One expansion of the FSHNC was achieved by the resolution of adverse effects through negotiation of a programmatic agreement (PA) between the VA, Texas Historical Commission (TX SHPO) and the Advisory Council on Historical Preservation which was executed in February 2009. On August 29, 2014, Phase Two of the cemetery expansion was split from Phase One to improve historic sections of the cemetery and a memorandum of agreement was signed to replace the 2009 PA. An amendment was added in 2017. Documentation of the agreements can be viewed at https://www.achp.gov/node/8807.

### **Undertaking**

The NCA's mission is to honor 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. As the FSHNC available internment spaces continue to decrease, FSHNC will not be able support burial requests and provide sufficient onsite parking to support the needs of Veterans, family members, and staff. The future development within the 43-acre area is needed to fulfill this mission.

Due to gravesite depletion, FSHNC requires additional burial capacity to serve veterans in the south-central Texas region. The purpose of the Project is to continue to enable the VA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs of the region for the next 15 years. The proposed Project sets out to repair and construct resources across the cemetery and expand cemetery facilities by approximately 43 acres on the eastern side of the property which were previously disturbed by US Army operations and currently undeveloped and vegetated. This project represents a continuation of a planned and anticipated multi-phase cemetery build out and no new property would need to be acquired. The Project will include 30,013 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, continuing repairs to the perimeter stone wall, restoration of the rostrum, correct infrastructure deficiencies, extend the irrigation system, construct three buildings including the new honor guard building, a vehicle storage, and a material storage; expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking. The historic stone wall entrance on the west side of the property was repaired in 2015 as laid out in the 2014 PA following SHPO stipulations to maintain historic value and aesthetic. Phase three would repair sections of the wall running south west off Harry Wurzbach Rd. for 280 linear feet and the portion paralleling Harry Wurzbach Road for approximately 1,225 linear feet.

Approximately 1,400 linear feet paralleling the south side of Winans Rd. is planned to be replaced with ornamental fence with intermediate columns if found to not be historic. The rostrum west of Harry Wurzbach Rd. and south of San Antonio Blvd. will also need repair to prolong the life of the structure. The new honor guard building was identified in the 2014 PA and 2017 amendments and is a continuation of the Phase Two project.

### Area of Potential Effect

The Area of Potential Effect (APE) is shown in Figure A – Project Overview and defined as the highlighted 43 acres East and West within the FSHNC boundaries.

### Identification of Historic Properties

Three archeological surveys were conducted between 1978 and 1988 at the FSHNC. Three archeological sites were recorded within the parcel but consultation with the TX SHPO concurred that none of these sites were eligible for the NRHP.

The VA recently completed an additional Cultural Resource Assessment on October 2<sup>nd</sup>, 2019. The review of the restricted-access state database of recorded cultural resources indicated that portions of the study area had been investigated during the past 42 years. Archaeological investigations undertaken in 1977 and 2017 were performed in support of the development and expansion for the cemetery. The remaining surveys (2000, 2014, and 2018) in the area were in support of road infrastructure and the development of the Salado Creek trail system. The studies did not identify any historic resources eligible for the NRHP. Most of the study area remains undeveloped; however, there has been continuous development of the cemetery complex to the west and in the surrounding northern parcels of the Fort Sam Houston property. The Fort Sam Houston National Cemetery was listed in the National Registry of Historic Places in 2016 individually and as a contributing feature of the Inter-World War National Cemeteries, 1934-1939.

VA also notes that should future construction activities uncover any archaeological remains, the activity in the immediate area will be stopped, while a professional archaeologist evaluates the remains.

### **Determination of Findings**

The VA requests that the Texas Historical Commission reply to this invitation indicating if it would like to participate as a consulting party in this ongoing federal review of the proposed undertaking.

If you have any questions or comments, or would like to be included as a consulting party; please do not hesitate to contact William Hooker for additional information at <u>William.hooker@va.gov</u> or (202) 632-6631.

Sincerely,

W. Edward Hooker, III Historic Architect/Cultural Resources Manager U.S. Department of Veterans Affairs National Cemetery Administration Design and Construction Service

Attachments:

- A. Area of Potential Effect
- B. 2019 Cultural Assessment
- C. Texas SHPO Request Form
- D. Aerial Images
- E. Section 106 Distribution List
- CC: Douglas Pulak, Federal Preservation Officer, U.S. Department of Veterans Affairs Fernando Fernandez, Environmental Engineer, U.S. Department of Veterans Affairs



January 16, 2020

Mr. Vincent Michael San Antonio Conservation Society 107 King William St. San Antonio, Texas 78204

# Subject: Initiation of Section 106 Consultation for the Proposed Phase 3 Site Expansion and Improvement of the Fort Sam Houston National Cemetery

Dear Mr. Michael,

Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations 36 Code of Federal Regulations (CFR) Part 800, the U.S. Department of Veterans Affairs (VA) is proposing to construct and operate a Phased expansion within an approximately 43-acre area in the existing Fort Sam Houston National Cemetery (FSHNC) located at 1520 Harry Wurzbach Road (see enclosed map). The National Cemetery Administration (NCA) is conducting this cemetery expansion project to increase burial capacity at FSHNC, which serves Veterans and their eligible family members in south central Texas.

### Background

The Fort Sam Houston National Cemetery (FSHNC) is located within the city limits of San Antonio at 1520 Harry Wurzbach Road, adjacent to the Fort Sam Houston Joint Base San Antonio. The FSHNC was created by the US Army in 1921. In 1931, it was designated a National Cemetery and formally named by Congressional Order Number 6 on August 4, 1937.

In 2001, approximately 150 acres of land previously owned by the US Army was transferred to VA ownership. In 2009, the Phase One expansion of the FSHNC was achieved by the resolution of adverse effects through negotiation of a programmatic agreement (PA) between the VA, Texas Historical Commission (TX SHPO) and the Advisory Council on Historical Preservation which was executed in February 2009. On August 29, 2014, Phase Two of the cemetery expansion was split from Phase One to improve historic sections of the cemetery and a memorandum of agreement was signed to replace the 2009 PA. An amendment was added in 2017. Documentation of the agreements can be viewed at https://www.achp.gov/node/8807.

### Undertaking

The NCA's mission is to honor 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. As the FSHNC available internment spaces continue to decrease, FSHNC will not be able support burial requests and provide sufficient onsite parking to support the needs of Veterans, family members, and staff. The future development within the 43-acre area is needed to fulfill this mission.

Due to gravesite depletion, FSHNC requires additional burial capacity to serve veterans in the south-central Texas region. The purpose of the Project is to continue to enable the VA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs of the region for the next 15 years. The proposed Project sets out to repair and construct resources across the cemetery and expand cemetery facilities by approximately 43 acres on the eastern side of the property which were previously disturbed by US Army operations and currently undeveloped and vegetated. This project represents a continuation of a planned and anticipated multi-phase cemetery build out and no new property would need to be acquired. The Project will include 30,013 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, continuing repairs to the perimeter stone wall, restoration of the rostrum, correct infrastructure deficiencies, extend the irrigation system, construct three buildings including the new honor guard building, a vehicle storage, and a material storage; expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking. The historic stone wall entrance on the west side of the property was repaired in 2015 as laid out in the 2014 PA following SHPO stipulations to maintain historic value and aesthetic. Phase three would repair sections of the wall running south west off Harry Wurzbach Rd. for 280 linear feet and the portion paralleling Harry Wurzbach Road for approximately 1,225 linear feet.

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VA also notes that should future construction activities uncover any archaeological remains, the activity in the immediate area will be stopped, while a professional archaeologist evaluates the remains.

### **Determination of Findings**

The VA requests that the San Antonio Conservation Society reply to this invitation indicating if it would like to participate as a consulting party in this ongoing federal review of the proposed undertaking.

If you have any questions or comments, or would like to be included as a consulting party; please do not hesitate to contact William Hooker for additional information at <u>William.hooker@va.gov</u> or (202) 632-6631.

Sincerely,

W. Edward Hooker, III Historic Architect/Cultural Resources Manager U.S. Department of Veterans Affairs National Cemetery Administration Design and Construction Service

### Attachments:

A. Area of Potential Effect

CC: Douglas Pulak, Federal Preservation Officer, U.S. Department of Veterans Affairs Fernando Fernandez, Environmental Engineer, U.S. Department of Veterans Affairs



### DEPARTMENT OF VETERANS AFFAIRS NATIONAL CEMETERY ADMINISTRATION Design and Construction Service Washington DC 20420

January 16, 2020

Dr. Felix D. Almaraz, Jr. Bexar County Historical Commission 101 W. Nueva St. Suite 930 San Antonio, TX 78205

## Subject: Initiation of Section 106 Consultation for the Proposed Phase 3 Site Expansion and Improvement of the Fort Sam Houston National Cemetery

Dear Dr. Almaraz Jr.,

Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations 36 Code of Federal Regulations (CFR) Part 800, the U.S. Department of Veterans Affairs (VA) is proposing to construct and operate a Phased expansion within an approximately 43-acre area in the existing Fort Sam Houston National Cemetery (FSHNC) located at 1520 Harry Wurzbach Road (see enclosed map). The National Cemetery Administration (NCA) is conducting this cemetery expansion project to increase burial capacity at FSHNC, which serves Veterans and their eligible family members in south central Texas.

### Background

The Fort Sam Houston National Cemetery (FSHNC) is located within the city limits of San Antonio at 1520 Harry Wurzbach Road, adjacent to the Fort Sam Houston Joint Base San Antonio. The FSHNC was created by the US Army in 1921. In 1931, it was designated a National Cemetery and formally named by Congressional Order Number 6 on August 4, 1937.

In 2001, approximately 150 acres of land previously owned by the US Army was transferred to VA ownership. In 2009, the Phase One expansion of the FSHNC was achieved by the resolution of adverse effects through negotiation of a programmatic agreement (PA) between the VA, Texas Historical Commission (TX SHPO) and the Advisory Council on Historical Preservation which was executed in February 2009. On August 29, 2014, Phase Two of the cemetery expansion was split from Phase One to improve historic sections of the cemetery and a memorandum of agreement was signed to replace the 2009 PA. An amendment was added in 2017. Documentation of the agreements can be viewed at https://www.achp.gov/node/8807.

### Undertaking

The NCA's mission is to honor 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. As the FSHNC available internment spaces continue to decrease, FSHNC will not be able support burial requests and provide sufficient onsite parking to support the needs of Veterans, family members, and staff. The future development within the 43-acre area is needed to fulfill this mission.

Due to gravesite depletion, FSHNC requires additional burial capacity to serve veterans in the south-central Texas region. The purpose of the Project is to continue to enable the VA to provide eligible Veterans and their families with a national cemetery of sufficient size and capacity to serve the projected needs of the region for the next 15 years. The proposed Project sets out to repair and construct resources across the cemetery and expand cemetery facilities by approximately 43 acres on the eastern side of the property which were previously disturbed by US Army operations and currently undeveloped and vegetated. This project represents a continuation of a planned and anticipated multi-phase cemetery build out and no new property would need to be acquired. The Project will include 30,013 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre-placed crypt full casket sites. Additional improvements include repairs to existing columbaria, continuing repairs to the perimeter stone wall, restoration of the rostrum, correct infrastructure deficiencies, extend the irrigation system, construct three buildings including the new honor guard building, a vehicle storage, and a material storage; expand and renovate two buildings, replace/add site furnishings, and construct access roads, roadway system and parking. The historic stone wall entrance on the west side of the property was repaired in 2015 as laid out in the 2014 PA following SHPO stipulations to maintain historic value and aesthetic. Phase three would repair sections of the wall running south west off Harry Wurzbach Rd. for 280 linear feet and the portion paralleling Harry Wurzbach Road for approximately 1,225 linear feet.

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### Area of Potential Effect

The Area of Potential Effect (APE) is shown in Figure A – Project Overview and defined as the highlighted 43 acres East and West within the FSHNC boundaries.

### Identification of Historic Properties

Three archeological surveys were conducted between 1978 and 1988 at the FSHNC. Three archeological sites were recorded within the parcel but consultation with the TX SHPO concurred that none of these sites were eligible for the NRHP.

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VA also notes that should future construction activities uncover any archaeological remains, the activity in the immediate area will be stopped, while a professional archaeologist evaluates the remains.

### **Determination of Findings**

The VA requests that the Bexar County Historical Commission reply to this invitation indicating if it would like to participate as a consulting party in this ongoing federal review of the proposed undertaking.

If you have any questions or comments, or would like to be included as a consulting party; please do not hesitate to contact William Hooker for additional information at <u>William.hooker@va.gov</u> or (202) 632-6631.

Sincerely,

W. Edward Hooker, III Historic Architect/Cultural Resources Manager U.S. Department of Veterans Affairs National Cemetery Administration Design and Construction Service

### Attachments:

A. Area of Potential Effect

CC: Douglas Pulak, Federal Preservation Officer, U.S. Department of Veterans Affairs Fernando Fernandez, Environmental Engineer, U.S. Department of Veterans Affairs



January 16, 2020

Ms. Joan Gaither Preservation Fort Sam Houston PO Box 340308 Fort Sam Houston, Texas 78234

# Subject: Initiation of Section 106 Consultation for the Proposed Phase 3 Site Expansion and Improvement of the Fort Sam Houston National Cemetery

Dear Ms. Gaither,

Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations 36 Code of Federal Regulations (CFR) Part 800, the U.S. Department of Veterans Affairs (VA) is proposing to construct and operate a Phased expansion within an approximately 43-acre area in the existing Fort Sam Houston National Cemetery (FSHNC) located at 1520 Harry Wurzbach Road (see enclosed map). The National Cemetery Administration (NCA) is conducting this cemetery expansion project to increase burial capacity at FSHNC, which serves Veterans and their eligible family members in south central Texas.

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### Undertaking

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### Area of Potential Effect

The Area of Potential Effect (APE) is shown in Figure A – Project Overview and defined as the highlighted 43 acres East and West within the FSHNC boundaries.

### Identification of Historic Properties

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VA also notes that should future construction activities uncover any archaeological remains, the activity in the immediate area will be stopped, while a professional archaeologist evaluates the remains.

### **Determination of Findings**

The VA requests that Preservation Fort Sam Houston reply to this invitation indicating if it would like to participate as a consulting party in this ongoing federal review of the proposed undertaking.

If you have any questions or comments, or would like to be included as a consulting party; please do not hesitate to contact William Hooker for additional information at <u>William.hooker@va.gov</u> or (202) 632-6631.

Sincerely,

W. Edward Hooker, III Historic Architect/Cultural Resources Manager U.S. Department of Veterans Affairs National Cemetery Administration Design and Construction Service

### Attachments:

A. Area of Potential Effect

CC: Douglas Pulak, Federal Preservation Officer, U.S. Department of Veterans Affairs Fernando Fernandez, Environmental Engineer, U.S. Department of Veterans Affairs



DEPARTMENT OF VETERANS AFFAIRS NATIONAL CEMETERY ADMINISTRATION Design and Construction Service Washington DC 20420

January 16, 2020

Mr. Seth Smith NEPA Program 1555 Goth St. JBSA, TX 78236-5568

### Subject: Initiation of Section 106 Consultation for the Proposed Phase 3 Site Expansion and Improvement of the Fort Sam Houston National Cemetery

Dear Mr. Smith,

Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations 36 Code of Federal Regulations (CFR) Part 800, the U.S. Department of Veterans Affairs (VA) is proposing to construct and operate a Phased expansion within an approximately 43-acre area in the existing Fort Sam Houston National Cemetery (FSHNC) located at 1520 Harry Wurzbach Road (see enclosed map). The National Cemetery Administration (NCA) is conducting this cemetery expansion project to increase burial capacity at FSHNC, which serves Veterans and their eligible family members in south central Texas.

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VA also notes that should future construction activities uncover any archaeological remains, the activity in the immediate area will be stopped, while a professional archaeologist evaluates the remains.

### **Determination of Findings**

The VA requests that JBSA NEPA program reply to this invitation indicating if it would like to participate as a consulting party in this ongoing federal review of the proposed undertaking.

If you have any questions or comments, or would like to be included as a consulting party; please do not hesitate to contact William Hooker for additional information at <u>William.hooker@va.gov</u> or (202) 632-6631.

Sincerely,

W. Edward Hooker, III Historic Architect/Cultural Resources Manager U.S. Department of Veterans Affairs National Cemetery Administration Design and Construction Service

### Attachments:

A. Area of Potential Effect

CC: Douglas Pulak, Federal Preservation Officer, U.S. Department of Veterans Affairs Fernando Fernandez, Environmental Engineer, U.S. Department of Veterans Affairs



### Fort Sam Houston National Cemetery Bexar County, TX

### Figure A Project Overview



#### Project Area West Actions:

- 1. Rehab existing roads
- 2. Repair/replace stone perimeter wall
- 3. Remodel interior of Public Information Center (PIC)
- 4. Expand parking area for PIC (14 stalls)
- 5. New Honor Guard building (1,238 s.f.)
- 6. Repair Rostrum and concrete walk

#### Project Area East Actions:

- 1. New Equipment Storage building (2,320 s.f.)
- 2. New Material Storage building (800 s.f.)
- 3. Administration building expansion (2,792 s.f.)
- 4. New access road
- 5. New Columbaria
- 6. New Gravesite area with roads



SOURCE: TxDNR, USDA, ESRI, TIGER, Bing, Bexar Co., Anderson Engineering

# **Cultural Resources Assessment**

FORT SAM HOUSTON NATIONAL CEMETERY: PHASE 3 EXPANSION AND IMPROVEMENTS 1520 HARRY WURZBACH ROAD, SAN ANTONIO, BEXAR COUNTY, TEXAS October 2, 2019

Terracon Project No. 90197318



### **Prepared for:**

U.S. Department of Veterans Affairs National Cemetery Administration Fort Sam Houston National Cemetery San Antonio, Bexar County, Texas

### Prepared by:

Terracon Consultants, Inc. San Antonio, Texas



October 2, 2019



Mark Wolfe, Executive Director Texas Historical Commission 1511 Colorado Street Austin, Texas 78701

Attention:Emily Dylla, PhD, Terrestrial ArchaeologistPhone:512-463-5915E-mail:Emily.Dylla@thc.texas.gov

### RE: Desktop Cultural Resources Assessment 1520 Harry Wurzbach Road San Antonio, Bexar County, Texas Terracon Project No. 90197318

Dear Mr. Wolfe,

Terracon is pleased to submit this Desktop Cultural Resources Assessment for the proposed 50- acre cemetery expansion at the Fort Sam Houston National Cemetery located at 1520 Harry Wurzbach Road in San Antonio, Bexar County, Texas (Exhibit 1). The project area is set aside as the planned third wave of expansion to the Fort Sam Houston National Cemetery. As discussed below, the purpose of Terracon's review is to assist the U.S. Department of Veterans Affairs National Cemetery Administration (client) in identification, evaluation, and documentation of previously recorded cultural resources relative to federal, state, and local regulations. This letter provides a cursory review of the project area with regards to potential impacts to recorded cultural resources and historic properties—*this review is based solely on research and was not informed by archaeological fieldwork.* 

Federal undertakings, such as this, are within the purview of Section 106 of the National Historic Preservation Act (NHPA), which requires federal agencies to consider their project's effects on historic properties listed or eligible for listing in the National Register of Historic Places (NRHP) in coordination with the State Historic Preservation Officer. Because the proposed project does not include land owned by a nonfederal public entity (i.e., State of Texas), then Terracon understands there to be no regulatory obligations with the Antiquities Code of Texas.

### **1.0 PROJECT DESCRIPTION**

The proposed area of potential effects includes approximately 50 acres across which there is planned construction of new roadways, parking lots, maintenance shed, and pond, as well as several areas dedicated to various styles of burial plots (Exhibit 2). Of that, approximately 32 acres are currently unimproved, wooded areas that are generally adjacent to Salado Creek, which forms the boundary of the expansion to the east and south. The remaining approximately 18 acres are currently cleared and maintained on the periphery of the extant cemetery.

Terracon Consultants, Inc. 6911 Blanco Road, San Antonio, Texas 78216 P [210] 641-2112 F [210] 641-2124 terracon.com Texas Professional Engineers No. 3272



### 2.0 NATURAL AND CULTURAL CONTEXTS

In general terms, the project area is located within the Blackland Prairie (Griffith et al. 2004). This ecoregion is distinguished by a unique combination of physical and biological properties. The Blackland Prairie is characterized topographically by nearly flat to rolling plains. The Blackland Prairie was at one point a diverse, productive grassland with wooded stream bottoms, but most of it has been converted to agricultural purposes or urban sprawl.

The 7.5-minute U.S. Geological Survey San Antonio East Quadrangle shows the study area as gently sloping, flat uplands above the Salado creek drainage; with elevations ranging from 650 to 700 feet above mean sea level from the west to east across the project area. Bedrock geology is mapped as the Pleistocene Fluviatile terrace deposits (Qt) which are mapped at the vertical terrace levels with gravel, silt, sand, and clay deposits that are adjacent to the Balcones Escarpment (Barnes 1976). Three soils are mapped in the area: Sunev clay loam, Loire clay loam, and Houston Black clay. Sunev clay loam series can be characterized as deep, well drained soils that are on nearly level to moderately steep stream terraces and foot slopes; they are formed in loamy alluvium. Loire clay series are also very deep and moderately permeable on nearly level floodplains; they form in loamy alluvial sediments. Houston Black Series consists of very deep and very slowly permeable clay soils that formed in clayey residuum from calcareous mudstone (NRCS Web Soil Survey 2019).

Generally, the cultural chronology of the Texas can be divided between Prehistoric and Historic time periods. The boundary between the two is marked by the introduction of Europeans into the western hemisphere. Through the last 75-plus years of archaeological research in the region, identifiable and repeated patterns in artifact assemblages have indicated major shifts in subsistence strategies and technology through time. As a result, Prehistoric Period has three subdivisions: Paleoindian, Archaic, and Late Prehistoric.

The Paleoindian period (ca. 12,500-8800 years ago) includes the earliest human occupation of North America, which extends back into the late Pleistocene. During this period of time, people hunted large game, but they generally had a broad diet and consumed much of what they could. This included small game and aquatic creatures all the way up to mega fauna that went extinct with the close of the Pleistocene (i.e., mammoth, mastodon, bison, horse, camel, etc.). Technological traditions further subdivide the Paleoindian period into Early and Late. The Archaic period (ca. 8800-1250 years ago) was the longest period in prehistory, and it is generally marked by the introduction of hot-rock cooking in addition to the proliferation of a wide variety of diagnostic projectile points. Cooking with fire-heated rocks developed with increased reliance on plant foods, which may have been a response to diminishing game resources and ultimately climatic change/variation. This is not to say that human agency, and ultimately culture, did not play an important role in the shift of economic and subsistence strategies. The Archaic period is subdivided into Early-, Middle-, and Late-Archaic periods, each with a slight variation in response to cultural shifts and ambient conditions. The Late Prehistoric (ca. 1250-250 years ago) was a relatively brief period, but it was marked by a shift in weapon technology: the introduction of the



bow-and-arrow. Like the Archaic, the Late Prehistoric people utilized hot rock cooking to process plants to edible forms. There also appeared to be increasing contact among groups, which resulted in increased trade of materials and evident competition over resources.

Sometimes referred to as the Protohistoric period, the Spanish Entradas, or expeditions, mark the onset of western influence in the New World. These explorations effectively scouted the new land and resulted in the settlement and establishment of missions spread throughout what has become northern Mexico and Texas. Through the Historic period, European populations and influence steadily increased as native populations were diminished.

### 3.0 RECORDS REVIEW

The City of San Antonio's Office of Historic Preservation database, Texas Archaeological Sites Atlas database (Atlas), and the NRHP geographic information system informed this records review. Additionally, aerial photographs available for the years 1955-2016 were reviewed to characterize land use and land cover within the study area.

The Atlas indicates that five archaeological surveys (ca. 1977, 2000, 2014, 2017 and 2018) have taken place at and around the proposed project area (Exhibit 3). Six prehistoric-age [41BX422, 41BX289, 41BX2187, 41BX2188, 41BX1406, 41BX1209], one historic-age [41BX2189], and two mixed historic-age and prehistoric-age archaeological sites [41BX880 and 41BX2058] were recorded within the immediate vicinity and within one-half mile of the proposed project area.

Of these recorded sites, 41BX2187 and 41BX2188, are located within the proposed expansion area (Exhibit 4); both are *ineligible* for listing the in National Register. The remaining sites recorded in the surrounding vicinity are either considered *ineligible* (41BX2189, 41BX1406, 41BX880, and 41BX2058) or their status is *unknown* (41BX422, 41BX1209, and 41BX389).

Additionally, Fort Sam Houston National Cemetery was listed on the National Register of Historic Places in 2016, due to the historic status of its establishment (ca.1937) and the integrity of the buildings, monuments, design, and setting (NRHP Registration form 2015).

The earliest aerial readily accessible (1955) indicates the study area appears to have included road infrastructure and an unknown structure. Over time the study area remained relatively unchanged with only minor vegetation cover variation until 1995, with land cover dominated by woody vegetation along the Salado creek bank and grasslands on the upper terrace level. The next available aerial imagery (2004) and topographic map (2013) indicate significant improvements at and in the immediate vicinity of the current study area, which are associated with previous expansion and improvements to the cemetery.

Fort Sam Houston National Cemetery Expansion San Antonio, Bexar County, Texas October 2, 2019 Terracon Project No. 90197318



### 4.0 CONCLUSIONS AND RECOMMENDATIONS

This review relied upon public and nonpublic sources of information. The restricted-access state database of recorded cultural resources indicates that portions of the study area have been investigated to varying levels at times in the past 42 years. Archaeological investigations undertaken in 1977 and 2017 were performed in support of the development and expansion of the cemetery. The remaining surveys (2000, 2014, and 2018) in the area were in support of road infrastructure and the development of the Salado Creek trail system. As mentioned in the previous section (2.1), most of the study area remains undeveloped; however, there has been continuous development of the cemetery complex to the west and in the surrounding northern parcels of the Fort Sam Houston property.

Given the findings of the previous investigations, extent of previous surveys, and previous responses from the Texas Historical Commission, the majority of the project area may not require further, field-based archaeological investigations. However, Terracon understands that further, field-based archaeological investigations *may be necessary* for the undeveloped sections (i.e., wooded areas) of the project area for compliance with Section 106 of the NHPA through regulatory review. This letter presents a desktop review of readily available information sources and requests input from the SHPO, Texas Historical Commission, regarding the proposed project.

Sincerely, Terracon Consultants, Inc.

Victoria C. Pagano, M.A. Staff Archaeologist David M. Yelacic, M.S., RPA Principal Investigator

Jennifer Peters APR, Environmental Planning Group Manager

### **Desktop Cultural Resources Assessment**

Fort Sam Houston National Cemetery Expansion San Antonio, Bexar County, Texas October 2, 2019 Terracon Project No. 90197318



### 5.0 REFERENCES CITED

Barnes, Virgil E.

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- Griffith, G. E., S. A. Bryce, J. M. Omernik, J. A. Comstock, A. C. Rogers, B. Harrison, S. L. Hatch and D. Bezanson
- 2004 *Ecoregions of Texas (Google Earth overlay).* Map Scale 1:2,500,000. U. S. Geological Survey, Reston, VA.

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### **Desktop Cultural Resources Assessment**

Fort Sam Houston National Cemetery Expansion San Antonio, Bexar County, Texas October 2, 2019 Terracon Project No. 90197318



APPENDIX A Exhibits (Maps)















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# **Eric Sautbine**

From: Sent: To: Subject: noreply@thc.state.tx.us Friday, July 17, 2020 8:55 AM Eric Sautbine; reviews@thc.state.tx.us Project Review: 202014532



Re: Project Review under Section 106 of the National Historic Preservation Act and/or the Antiquities Code of Texas

### THC Tracking #202014532

Fort Sam Houston National Cemetery, New building to replicate demolished bldg. 1002 and other work 1520 Harry Wurzbach Rd San Antonio,TX 78209

## Dear Eric Sautbine:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act.

The review staff led by Emily Dylla, Caitlin Brashear and Pam Opiela has completed its review and has made the following determinations based on the information submitted for review:

## **Above-Ground Resources**

- Property/properties are eligible for listing or already listed in the National Register of Historic Places.
- THC/SHPO unable to complete review at this time based on insufficient documentation. A supplemental review must be submitted, and the 30-day review period will begin upon receipt of adequate documentation.

We have the following comments: Please send the information on the traditional stucco products and system you propose in this submittal for our review. Since you state in your current proposal that historic railings the VA had agree to use on the new building are no longer available, please send the product information for the proposed new replicated railings. We also may wish to discuss amending the MOA to reflect the changes you propose. Please contact Pam Opiela in our Division of Architect pamela.opiela@thc.texas.gov to discuss changes to the agreement and any other questions you may have.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this review process, and for your efforts to preserve the irreplaceable heritage of Texas. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: emily.dylla@thc.texas.gov, caitlin.brashear@thc.texas.gov, pamela.opiela@thc.texas.gov

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <a href="http://thc.texas.gov/etrac-system">http://thc.texas.gov/etrac-system</a>.

Sincerely,

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For Mark Wolfe, State Historic Preservation Officer Executive Director, Texas Historical Commission

Please do not respond to this email.

From: noreply@thc.state.tx.us <noreply@thc.state.tx.us> Sent: Monday, December 7, 2020 9:08 AM To: Hooker III, William E.; reviews@thc.state.tx.us Subject: [EXTERNAL] Section 106 Submission



Re: Project Review under Section 106 of the National Historic Preservation Act and/or the Antiquities Code of Texas **THC Tracking #202103594** 

Fort Sam Houston National Cemetery

,ΤX

### Description: Clarification of projects at Fort Sam Houston National Cemetery

Dear Client:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act.

The review staff, led by Caitlin Brashear, Hansel Hernandez, Emily Dylla, has completed its review and has made the following determinations based on the information submitted for review:

#### **Above-Ground Resources**

• THC/SHPO concurs with information provided.

#### **Archeology Comments**

• THC/SHPO concurs with information provided.

We have the following comments: Above ground resources: The Texas Historical Commission will review the material for the Rebuilding deteriorated stone wall paralleling Harry Wurzbach Road when it becomes available separately.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: <u>caitlin.brashear@thc.texas.gov</u>, <u>hansel.hernandez@thc.texas.gov</u>, <u>emily.dylla@thc.texas.gov</u>.

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <a href="http://thc.texas.gov/etrac-system">http://thc.texas.gov/etrac-system</a>.

Sincerely,

aithin Brashean

for Mark Wolfe, State Historic Preservation Officer Executive Director, Texas Historical Commission

Please do not respond to this email.