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

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Table of Contents

Executive Summary 2
Section 1.0 Introduction 5
Section 2.0 Proposed Action & Alternatives 7
Section 3.0 Affected Environment and Environmental Consequences 11
3.1 Aesthetics 12
3.2 Air Quality 13
3.3 Cultural Resources 15
3.4 Geology, Topography, and Soils 17
3.5 Hydrology and Water Quality 19
3.6 Wildlife and Habitat 20
3.7 Noise 21
3.8 Land Use 24
3.9 Floodplains and Wetlands 24
3.10 Socioeconomics 26
3.11 Community Services 26
3.12 Solid Waste and Hazardous Materials 27
3.13 Transportation and Parking 28
3.14 Utilities 29
3.15 Environmental Justice 30
3.16 Cumulative Impacts 31
3.17 Potential for Generating Substantial Controversy 32
Section 4.0 Public Involvement 33
Section 5.0 Management and Minimization Measures 34
Section 6.0 Summary and Conclusion 40
Section 7.0 List of Preparers 41
Section 8.0 References 42
Section 9.0 List of Acronyms and Abbreviations 43

Table 1: Summary of Resource Area Impacts
Table 2: Mapped Soil Units
Table 3: FSHNC Prime Farmland
Table 4: Peak Noise Levels Expected from Typical Construction Equipment
Table 5: Average REL to Meet Maximum Allowable Daily Dose of 100%
Table 6: Population Levels 2010-2018
Table 7: Veteran Population Totals
Table 8: Management and Minimization Measures

Appendix A: Figures
Appendix B: Stakeholder Consultation
Appendix C: Tribal Consultation
Appendix D: SHPO Consultation

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 42,516 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.

Table 1. Summary of Resource Area Impacts

Resource Area	Proposed Action Alternative	No Action Alternative
Aesthetics	• Short-term, less-than-significant adverse impacts during construction resulting from earthwork, development, and associated activities. • Long-term, beneficial aesthetic impact from the establishment of the area to the park-like National Cemetery setting and National Shrine Standards.	• None
Air Quality	• 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.	• None
Cultural Resources	• No impacts to archeological resources • Less than significant impacts to historic resources with SHPO mitigation and BMPs	• None
Geology, Topography, and soils	• 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. • Negligible, less-than-significant adverse impacts to soils due to impacts to prime farmland. Negligible adverse impact to geology, topography, and soils during operation.	• Significant adverse effects to soil quality if unpermitted landfills are left on site.
Hydrology and Water Quality	• Long term, beneficial impacts to irrigation because of the installation and replacement with more efficient systems	• Long term, adverse impacts to outdated irrigation system
Wildlife and Habitat	• Less-than-significant, short-term adverse impact due to construction and operation.	• None
Noise	• Minor short-term adverse impacts during construction • No adverse noise impacts during operation	• None
Land Use	• No impact to land use. Expansion is consistent with existing zoning and land use conditions	• None
Floodplains and Wetlands	• Potential short and long term less-than-significant impacts to floodplains within project area	• None
Socioeconomics	• Minor short-term beneficial impact during construction.	• None
Community Services	• No effect during construction. • Long-term beneficial impact during operation.	• Long-term adverse impact.

Solid Waste and Hazardous Materials	• Less-than-significant short-term adverse effects during construction and mitigation. • Long term beneficial effect from clean up and removal of buried waste on site.	• Long term adverse effect as buried waste would be left on site and not mitigated.
Transportation and Parking	• Minor short-term adverse effects during construction due to increase in construction vehicles and equipment. • Long-term beneficial impacts during operation.	• None.
Utilities	• No effect during construction. • Beneficial long-term effects during operation due to improvement and modernization of systems.	• None.
Environmental Justice	• None.	• Long-term adverse impact.
Cumulative Impacts	• 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.	• Significant adverse effects; VA would not meet its standards for providing internment options for veterans; unpermitted landfills would remain affecting soil quality.

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.

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. NCA's objective of 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 42,516 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

VA, as a federal agency, 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.

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, 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, 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). Project development would provide for and The Project will include 42,516 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. 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 42,516 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 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 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.

2.1.1.3 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 new 2" water service and will be connected to the existing sanitary system.

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.

2.1.1.4 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 would incorporate current VA sustainable design standards 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 EO 13834.

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 continue to be from Hoff Road, with a secondary service access road connecting the north side of the Project area to Walter Strawn Drive. 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.

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.

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 diesel-powered 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 projectarea)
- 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.

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 having 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.

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 EPA 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 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.

VA would secure any required, individual minor air emissions permits from the Texas EPA, 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 https://www.achp.gov/node/8807.

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 https://www.achp.gov/node/8807.

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.

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 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. As space depletes and infrastructure continues to decline and 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, 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. 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.

Soils

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):

Table 2. Mapped Soil Units

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

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.

Soil

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.

Table 3. FSHNC 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

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-than-significant 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 Texas EPA 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:

- 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, rip-rap, 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.

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 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 design storm
• 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, less-than-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 forest. 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).

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.

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.

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.

Table 4. Peak Noise Levels Expected from Typical Construction Equipment

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

Combined Peak Noise Level	**50**	**100**	**200**	**¼ Mile**	**½ Mile**
	103	97	91	74	68

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 3).

Table 5. Average REL to Meet Maximum Allowable Daily Dose of 100%

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

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 7:00 a.m. and 7:00 p.m. on Monday through Friday, or during normal, weekday work hours. 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 speed restrictions).

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.

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. Consultation will be conducted with the City of San Antonio during the CLOMR process 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. 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

Table 6.

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

Table 7.

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.

3.11 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 42,516 gravesites. Visitors to the National Cemetery would likely arrive by personal car, as no public transportation options 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.

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

No project-specific minimization or management measures are required.

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 short-term 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 RMW 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 TCLP acrylamide to make a Class II demonstration 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.

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.

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.

Minority Populations: 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-tern adverse impact to this 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 impacts 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. Additionally, the unpermitted landfill as outlined in section 3.12 above, will continue to exist further impacting the environment.

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 will be 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

VA, as the Federal proponent of this Proposed Action, 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 WEBSITE HERE. 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 (CESWF-DE-R)
Natural Resource Conservation Service -Texas State Office Joint Base San Antonio Public Affairs
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 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 ProposedAction.

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	• 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 • implement the construction-related BMPs for dust control described Section 3.2

Air Quality	• Maintain engines and exhaust systems in good working order. • Reduce vehicle idle times in accordance with VA Directive 0637. • Comply with Texas EPA 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 would be inactive for several weeks or longer and upon completion of sitepreparation. • 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 theyarise
Cultural Resources	• 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, 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. • The design of the Honor Guard Building will follow the mitigation and design standards laid out in SHPO consultation and prior PAs and MOAs.
Geology, Topography, and soils	• The construction contractor would develop a stormwater pollution prevention plan and obtain NPDES Construction General Permit coverage from Texas EPA 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, rip-rap, 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.
Hydrology and Water Quality	• 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
Wildlife and Habitat	• 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 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.
Noise	• 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 7:00 a.m. and 7:00 p.m. on Monday through Friday, or during normal, weekday work hours. 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.

Land Use	None
Floodplains and Wetlands	• Construction activities would comply with applicable permit(s) from the 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. • 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.
Socioeconomics	None.
Community Services	None.
Solid Waste and Hazardous Materials	• 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 short- term 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 RMW 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 TCLP acrylamide to make a Class II demonstration in coordination with the landfill.
Transportation and Parking	• 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.
Utilities	• Coordination is underway with the City of San Antonio to ensure proposed expansion utility elements do not exceed capacity provided to the site.
Environmental Justice	• 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.
Cumulative Impacts	• None.

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 Texas EPA 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 such case 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 over the course of the public involvement period will be incorporated into the Final EA.

Section 7.0 List of Preparers

U.S. Department of Veterans Affairs

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Eric Sautbine – Project Manager

Section 8.0 References

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Section 9.0 List of Acronyms and Abbreviations

ACHP	Advisory Council on Historical Preservation
AIRFA	American Indian Religious Freedom Act
APE	Area of Potential Effect
AQCR	Air Quality Control Regions
AQI	Air Quality Index
ARPA	Archeological Resource Protection Act
bgs	Below Ground Surface
BMP	Best Management Practice
CEQ	Council on Environmental Quality
CESWF-DE-R	Regulatory Division, Fort Worth District, USACE
CFR	Code of Federal Regulations
CLA	Clean Air Act
CLAA	Clean Air Act Amendments
COSA	City of San Antonio
dBA	decibels, A-weighted scale
DOT	Department of Transportation
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
EPA	Environmental Protection Act
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impacts
FPPA	Farmland Protection Policy Act
FSHNC	Fort Sam Houston National Cemetery
HAP	Hazardous Air Pollutant
IPaC	Information for Planning and Consultation
JBSA	Joint Base San Antonio
MOA	Memorandum of Agreement
NCA	National Cemetery Administration
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act
NIOSH	National Institute of Occupational Safety and Health
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
PA	Programmatic Agreement
REL	Recommended Exposure Limit
SHPO	State Historical Preservation Office
SWMF	Stormwater Management Facilities
TCEQ	Texas Commission on Environmental Quality
TDAT	Tribal Directory Preservation Tool
THC	Texas Historical Commission
TPWD	Texas Parks and Wildlife Department
TWDB	Texas Water Development Board
TVC	Texas Veterans Commission
USACE	US Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	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

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Chairman Lyman Guy
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PO Box 1330
Anadarko, Oklahoma 73005

Ms. Holly Houghten
Mescalero Apache Tribe of the Mescalero Reservation

Section 11.0 List of Environmental Permits Required

- Conditional Letter of Map Revision FEMA Permit
- Letter of Map Revision FEMA Permit
- City Building Permit
    - Honor Guard Building
    - Equipment Storage Building
    - Material Storage Building
    - Administration Building
- National Pollutant Discharge Elimination System (NPDES) Permit
- Stormwater Pollution Prevention Plan