FINDING OF NO SIGNIFICANT IMPACT (FONSI)
FOR THE U.S. DEPARTMENT OF VETERANS AFFAIRS SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT PROPOSED CONSTRUCTION AND OPERATION OF THE PHASE 5 EXPANSION INDIANTOWN GAP NATIONAL CEMETERY ANNVILLE, LEBANON COUNTY, PENNSYLVANIA

1.0 Introduction

The U.S. Department of Veterans Affairs (VA), National Cemetery Administration (NCA), completed a Supplemental Environmental Assessment (SEA), included herein by reference in its entirety, to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Proposed Action to implement the Phase 5 expansion for the Indiantown Gap National Cemetery (IGNC), located at Indiantown Gap Road, Annville, Lebanon County, Pennsylvania.

NCA is responsible for providing cemetery services for Veterans and other eligible persons pursuant to the provisions of the *National Cemeteries Act of 1973* and other statutory authority and regulations. Under this mandate, NCA is responsible for the operation and maintenance of existing national cemeteries and the construction of new national cemeteries.

Under the Proposed Action, VA would implement the proposed Phase 5 expansion at IGNC. The Proposed Action would develop approximately 45 acres of land within the current IGNC property boundary; no new property would be acquired. The Proposed Action would provide approximately 15,700 new burial sites, create a new Honor Guard, and make improvements to maintenance facilities and associated supporting infrastructure, thereby extending the longevity of IGNC for at least 15 years and providing long-term, reasonable access to burial benefits for future generations of eligible Veterans and their families at a National Cemetery in east central Pennsylvania.

The SEA was prepared in accordance with the *National Environmental Policy Act* of 1969 ([NEPA]; 42 United States Code [USC] 4321 *et seq*.), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and VA's NEPA implementing regulations, 38 CFR Part 26 (*Environmental Effects of the Department of Veterans Affairs Actions*). This SEA supplements and updates the analyses and findings presented in VA's 2012 Phase 4 EA (VA, 2012), and the 1979 EIS for the initial siting and environmental impacts for the construction and operation of IGNC (VA, 1979).

If the Proposed Action is not implemented, the longevity of IGNC would not be extended, and future generations of eligible Veterans and their families increasingly would not have long-term, reasonable access to burial benefits at a National Cemetery in east central Pennsylvania. These Veterans and their families would be required to travel to a National Cemetery located more than 75 miles from east central Pennsylvania. Presently, in Pennsylvania, the nearest National Cemeteries to east central Pennsylvania include the Washington Crossing National Cemetery in Newton (approximately 115 miles east) and the National Cemetery of Alleghenies (approximately 240 miles west). The nearest National Cemeteries outside of Pennsylvania are the Baltimore National Cemetery, Catonsville, Maryland (approximately 105 miles south), and the Arlington National Cemetery in Arlington, Virginia (approximately 145 miles south). Other National Cemeteries in Pennsylvania and beyond are not located within a reasonable distance of Veterans and their families in the east central Pennsylvania region.

Thus, the ***purpose*** of the Proposed Action is to enable NCA to continue providing interment benefits to eligible Veterans and their families by further extending the longevity of IGNC.

Due to gravesite depletion, the Proposed Action is ***needed*** to allow NCA to continue meeting its goal of providing eligible Veterans with reasonable access to VA burial options in east central Pennsylvania.

2.0 Background

IGNC is approximately 20 miles northeast of Harrisburg and 96 miles northwest of downtown Philadelphia, PA. Situated on 677 acres, the property that is now IGNC was donated to NCA from the Commonwealth of Pennsylvania in 1976. In 1979, VA completed an Environmental Impact Statement (EIS) that analyzed the initial site selection and the reasonably foreseeable impacts associated with the development of the property as a National Cemetery designed to serve Veterans residing in Pennsylvania and surrounding states, including Delaware, New Jersey, Maryland, Virginia, and West Virginia (VA, 1979). The EIS concluded that by incorporating mitigation and management measures, development of would have no significant adverse impacts on the environment.

Subsequently, in 1980, VA began constructing the Phase 1 portion of IGNC. The Phase 1 development included burial sections and supporting infrastructure, including a main entrance, Public Information Center/Administration (PIC/Admin) building, and roadways. This development occurred throughout 20 acres of the property and provided the initial burial capacity. The first interments at IGNC occurred in 1982. Additional burial capacity was added during the Phase 2 expansion in 1987 and the Phase 3 expansion in 1998. VA relied on the findings of the 1979 EIS to evaluate environmental impacts associated with the development of Phases 1, 2, and 3. In 2012, VA completed a separate Environmental Assessment (EA) to evaluate the impacts to the environment associated with a proposed Phase 4 expansion (VA, 2012). The 2012 EA concluded with a FONSI; subsequently, VA completed construction of the Phase 4 expansion by 2017; this expansion provided burial capacity, a new irrigation pond, a new memorial wall/scattering garden area, and a new committal service shelter and Honor Guard facility.

As of October 2020, IGNC had approximately 57,000 interred sites, with approximately 14,500 burial spaces remaining. Currently, on average, ten burials are performed per day, equaling approximately 2,400 burials annually. Currently, approximately 427 acres of undeveloped grounds remain at the IGNC property.

3.0 Description of Proposed Action and Alternatives

3.1 Proposed Action

Under the Proposed Action, VA would implement the proposed Phase 5 expansion at IGNC. The Proposed Action would be constructed over the next three years to provide approximately 15,700 new burial areas and include upgrades to the satellite maintenance facility, new access roadways, landscaping, a new groundwater supply well and extension of irrigation systems, additional stormwater management systems, removal and replacement of the Honor Guard building and its parking area, and site furnishings. The layout of the Proposed Action would follow the design developed by VA in 2021. The Proposed Action would be located immediately east of the existing developed cemetery areas, such that the Proposed Action is a natural extension of those areas.

The Proposed Action would extend the longevity of IGNC and accommodate burial needs of Veterans and their families in east central Pennsylvania. Therefore, the Proposed Action would meet the purpose and need for action. No other reasonable action alternatives were carried forward for this SEA.

3.2 No Action Alternative

In addition to the Proposed Action, VA evaluated a No Action Alternative, as required by CEQ (40 CFR 1502.14). The No Action Alternative reflects the status quo and provides a comparative baseline against which to analyze the effects of the Proposed Action.

Under the No Action Alternative, the Proposed Action would not be implemented. The current conditions at IGN would remain unchanged for the foreseeable future. No increase in burial capacity would occur, a new Honor Guard facility would not be constructed, and other improvements would not be made to the maintenance facilities and supporting infrastructure. Without an increase in burial capacity, Veterans and their families residing in east central Pennsylvania would be underserved in the future. Veterans who chose

burial benefits at a National Cemetery with available capacity would be required to select a National Cemetery that is located more than 75 miles outside of the east central Pennsylvania region.

Requiring travel of more than 75 miles is considered to be an undue burden to obtain burial benefits and would also create a hardship for the survivors of deceased Veterans wanting to attend funerals and visitations, which is not in compliance with the *Service Members Civil Relief Act*. Should this burden cause Veterans and their eligible families to resort to private burials, they are deprived of the honor and privilege bestowed upon them by a grateful nation for their service to their country. Therefore, the No Action alternative would not meet the purpose and need for action.

4.0 Environmental Analysis

As documented in the SEA incorporated in its entirety herein, VA concludes that no significant adverse impact, considered individually or cumulatively, would result from implementing the Proposed Action on any of the environmental resource topics analyzed in the SEA.

Under the Proposed Action, VA would implement management, avoidance, and regulatory compliance measures to minimize impacts at less-than-significant adverse levels as described in the SEA and summarized in the attached table (included as Appendix A in this FONSI).

This FONSI also presents a summary of the anticipated adverse and beneficial impacts associated with implementing the Proposed Action to each environmental resource topic analyzed in the SEA. Construction or operation of the Proposed Action would have no adverse or beneficial impact on geology, topography, coastal zone management, land use, or environmental justice; therefore, these topics are excluded from the following summary.

Aesthetics. The design of the Phase 5 cemetery would retain IGNC's forested appearance which would provide a natural buffer, as well as preserving the historic green ash trees if present. During construction of this Phase 5 expansion design, short-term, direct, less-than-significant adverse impacts could occur on aesthetics from site preparation, the presence of heavy construction equipment, and unfinished stages of construction. Land clearing and grading would expose soils, which could increase fugitive dust generation and impact the appearance of finished portions of IGNC. To minimize these potential impacts, construction areas would be obscured by fabric-covered privacy fencing, water trucks would be used to minimize fugitive dust emissions, and gravel-covered pads would be installed at the construction exits to remove loose soil from vehicles and equipment exiting the construction site.

Operation of the Phase 5 cemetery would provide direct, long-term, moderately beneficial aesthetic impacts within the property. The Proposed Action would extend the appearance of a National Shrine throughout the property, with elements including professionally landscaped and maintained grounds, winding roadways, and retention of the natural undulating topography.

Air Quality. Short-term, direct, less-than-significant adverse impacts could occur from operating diesel-fueled construction equipment during grading, construction of interment areas, roadways, structures, and associated infrastructure improvements. Non-road construction vehicles would generate criteria pollutant emissions and land clearing and grading activities would generate fugitive dust and fine particulate emissions. To minimize these potential impacts, construction equipment would be maintained in good working order, idling would be limited to less than five minutes, and Best Management Practices (BMPs) to suppress dust and stabilize exposed soils would be implemented to further minimize particulate emissions. All anticipated emissions would be below the National Ambient Air Quality Standards (NAAQS) General Conformity Rule *de minimus* thresholds.

Operational sources of air emissions would be generated from visitors' vehicles traveling through the Phase 5 cemetery expansion and maintenance vehicles for mowing and memorial services and visitation. These activities would result in a negligible increase in overall emissions.

Cultural Resources. A Phase IB archaeological investigation of the Phase 5 expansion area was conducted and concluded that no artifacts or archaeological sites were identified within the area. The Proposed Action incorporates an inadvertent discovery plan to further avoid impacts to any archaeological resources encountered.

VA has initiated Section 106 consultation with the PA State Historic Preservation Office (SHPO) and received concurrence with a finding of no adverse impact on July 14 and 16, 2021. Additionally, VA initiated Section 106 with the PA SHPO to issue a finding of effect and outline mitigation measures for the historic green ash trees on February 27, 2018. Per that correspondence, NCA committed to replace dead/diseased green ash trees at 2:3 with healthy trees of various species suited to the region.

Soils. Construction of the Proposed Action would have a short-term, less-than-significant adverse impact on soils due to increased potential for soil erosion and sedimentation of stormwater run-off. These potential impacts would be minimized by implementing construction BMPs specified in the soil erosion and sedimentation control (SESC) plan and PA Department of Environmental Protection (PADEP) NPDES Permit.

Surface Water and Wetlands. Long-term, direct, less-than-significant impacts on surface water and wetlands would occur from implementation of the Proposed Action. To avoid and minimize potential impacts, the design maintains existing watercourse flows through the use of roadway bridges and avoid wetlands and transition areas with the exception of one stream crossing and one adjacent 0.02-acre wetland. This wetland and stream crossing would be permanently impacted during the construction of a culvert installed to create a bridge over the stream channel. VA received a U.S. Army Corps of Engineers 404 permit for the impacts associated with culverted stream crossing. Additionally, PADEP is currently reviewing a Section 401 State Water Quality Certification permit application. The 401 permit would also be obtained prior to performing any construction that would cross the stream.

To avoid petroleum-based fluids from construction equipment adversely impacting surface water, construction equipment would be properly maintained in good working order and equipped with emergency spill kits. Additionally, construction equipment would be refueled in designated impervious areas away from surface water resources. Other potential adverse impacts on water resources such as sedimentation of run-off would be avoided and minimized by adhering to the BMPs in the aforementioned SESC and NPDES Permit, as well as maintaining pre-development hydrology to the maximum extent technically practicable per Section 438 of the *Energy Independence and Security Act* (EISA).

Operation of the Proposed Action would have a long-term, indirect, negligible impact on surface water resources and wetlands due to potential stormwater runoff, which would be minimized through the maintenance of stormwater basins.

Stormwater. Short-term, less-than-significant adverse impact to stormwater conditions could occur due to sedimentation of stormwater runoff during construction activities. To minimize these impacts, permit-required BMPs would be implemented and maintained throughout construction. Additionally, the Phase 5 expansion is be designed to comply with EISA Section 438 (USEPA, 2009) to the maximum extent technically feasible through engineering and design controls, such as minimizing the area of new impervious surfaces, directing stormwater run-off to existing and new storage basins, and allowing precipitation to infiltrate into the ground surface to the maximum extent possible.

Wildlife and Habitat. Short- and long-term, less-than-significant impacts to wildlife and habitat could occur from construction activities and modification of wooded areas to landscaped grounds. To minimize these adverse impacts, VA completed Phase I and Phase II Bog Turtle surveys within the Phase 5 expansion area and within portions of the existing cemetery grounds where infrastructure improvements would occur. While no bog turtles were identified in the Phase 5 area, potential bog turtle habitat area was identified near selected wetlands within the existing cemetery grounds. To avoid impacts to bog turtles during future

infrastructure improvements, USFWS provided engineering and administrative measures that VA has agreed to implement. Additionally, VA agreed to implement USFWS-specified time-of-year tree clearing restrictions to avoid impacts to northern-long-eared bats during the pup season; this restriction prohibits tree clearing from June 1 to July 31. Additionally, impacts to the Indiana bat during the pup season would be avoided by adhering to the USFWS seasonal tree restriction, which prohibits tree clearing from April 1 to September 15. USFWS issued concurrence that the Proposed Action would avoid impacts to these specified based on VA's agreement to implement the aforementioned avoidance measures.

Noise. Short- and long-term, less-than-significant impacts to sensitive noise receptors could occur due to noise generated from heavy construction equipment used for grading, building and road construction, infrastructure improvements, and from construction workers traveling through the existing cemetery grounds to and from the construction site. Noise impacts would be minimized by scheduling construction activities during normal weekday business hours, operating machinery with mufflers in good working order, and establishing a construction route away from existing cemetery grounds.

Current operational noises from mowing and other routine maintenance activities would also occur in the Phase 5 expansion area. Operational impacts would be minimized by scheduling these activities at burial sections when memorial services are not actively occurring.

Socioeconomics. Short-term, direct, less-than-significant beneficial impact on socioeconomics could occur during construction of the Proposed Action through the employment of local skilled and non-skilled workers and purchasing of materials from local or regional suppliers.

Negligible beneficial impacts would occur during operation. Operation of the Proposed Action is anticipated to maintain or slightly increase current staffing levels. Extending the longevity of IGNC would increase the number of visitors to the area, who may utilize local supporting businesses (restaurants, lodging, service stations), and avoiding the higher travel costs otherwise associated with visiting a National Cemetery located outside of the east central Pennsylvania region.

Community Services. Direct, long-term, significant beneficial impacts by providing additional burial capacity at IGNC, benefiting Veterans and their families in the east central Pennsylvania region. No impacts would occur to other community services (e.g. police, fire, medical, schools, housing).

Solid and Hazardous Materials. Short-term, direct, negligible adverse impacts could occur from generating excess solid wastes during construction of the Proposed Action. To minimize adverse impacts, excess construction materials would be recycled to the maximum extent practicable and/or transported off-site for recycling. Excess soils would be used as fill (if suitable) or transported off-site for reuse. Should regulated building materials be identified in any materials scheduled for demolition or renovation, those materials would first be abated and then transported off-site for disposal according to federal and state regulations.

Operation of the Proposed Action would generate a negligible increase in typical solid wastes currently generated by cemetery operations, including memorial decorations and a minimal volume of excess soils. Licensed workers would perform any pesticide or herbicide applications according to product labels.

Transportation and Parking. Construction of the Proposed Action is not anticipated to impact transportation or parking. Operation of the Proposed Action would have a long-term, direct, negligible beneficial impact on transportation. The Proposed Action would improve the vehicular circulation pattern of visitors and Honor Guard volunteers by creating a new Honor Guard building and parking area. Operation of the Proposed Action would generate a minor increase in visitor traffic. The BMPs identified under aesthetics and soils would be implemented to prevent tracking construction debris and dirt onto roadways at IGNC and beyond.

Utilities. Long-term, direct, less-than-significant adverse impacts during operation due to increased volume of potable water and groundwater used to supply irrigation water for newly landscaped grounds. Irrigation water would be supplied by a combination of non-potable water sources, such as the stormwater retention ponds, which would be supplied by precipitation and supplemented by groundwater from new wells, and by from the potable water supplied by Pennsylvania American Water. Additional measures to reduce the operational irrigation water demand include planting and maintaining native, non-invasive drought-tolerate turfgrass and other vegetation.

Construction or operation of the Proposed Action would have no adverse impact on geology, environmental justice, coastal zone resources, and community services other than burial services. Additionally, implementing the Proposed Action is anticipated to be perceived as a positive development within the community, and therefore would not generate substantial public controversy.

5.0 Cumulative Impacts

Impacts from implementing the Proposed Action, in combination with those from past, present, and reasonably foreseeable future developments at and in the vicinity of IGNC, are not expected to increase impacts to a significant adverse level for any of the environmental resource topics analyzed in this SEA.

Resources that have the potential to be cumulatively affected by the Proposed Action, when combined with other past, present, and reasonably foreseeable future projects at IGNC, include Aesthetics, Cultural Resources, Soils, Surface Water, Vegetation and Wildlife, Noise, and Wetlands.

Aesthetics. Short-term, direct, less-than-significant adverse, cumulative impacts on aesthetics are expected from the construction of the Proposed Action. The approximately 30-month construction period for the Proposed Action would not necessarily occur over one continuous period. Furthermore, the result of Proposed Action would have long-term beneficial impacts on the aesthetic conditions of the area. The Proposed Action would expand the park-like setting of the National Cemetery to more areas across IGNC. Maintaining the aesthetic integrity of IGNC includes preserving portions of the forested areas for hedgerows, preserving healthy ash trees, and maintaining a wooded buffer around the north, east, and southern borders of the Phase 5 expansion area. However, the potential cumulative adverse impacts from these temporary projects would not increase to a significant adverse level. Therefore, the Proposed Action would result in less-than-significant cumulative adverse impacts on aesthetics.

Soils. Construction of the Proposed Action would have a short-term, direct, less-than-significant adverse impact on soils due to increased potential for soil erosion and sedimentation of stormwater runoff. Soils at IGNC have been under extensive long-term agricultural production followed by more recent cemetery development. Individually, construction activities would have short-term, negligible to minor, adverse impacts due to vegetation removal, compaction of soils, and increased potential for soil erosion and sedimentation. Construction activities occurring at the same time and in the same vicinity could have short-term, minor, adverse cumulative effects on soils, but implementation of BMPs in the SESC plan and NPDES Permit would ensure cumulative impacts are maintained at less-than-significant levels. Therefore, considered cumulatively, the Proposed Action would result in short-term, less-than-significant adverse impacts on soils.

Surface Water and Wetlands. Short- and long-term, less-than-significant adverse impacts on surface water and wetlands are expected from implementation of the Proposed Action and when considered cumulatively with other projects. All projects in Pennsylvania are required to implement design measures and permit-required erosion and sedimentation controls to avoid and/or minimize adverse impacts, while appropriate mitigation for unavoidable wetland impacts would be determined and performed prior to construction. These management and mitigation measures, when warranted, would ensure that cumulative impacts on these resources remain at less-than-significant adverse levels.

Wildlife and Habitat. Short- and long-term, less-than-significant adverse impacts on wildlife and habitat are expected from implementation of the Proposed Action and when considered cumulatively with other projects. The Proposed Action incorporates impacts avoidance measures for federally- and state-listed species, as would future projects at IGNC and other permit-required projects elsewhere in Pennsylvania. These measures include surveys for listed species, implementing impact-avoidance measures, and performing permit-approved mitigation when impacts cannot be avoided. These management and mitigation measures, when warranted, would ensure that cumulative impacts on these resources remain at less-than-significant adverse levels.

Noise. Short- and long-term, less-than-significant impacts to sensitive noise receptors could occur during construction and operation of the Proposed Action. Noise generated from other projects at IGNC and in the immediately surrounding areas would not have a cumulative impact on receptors, as the distance between these individual sources is too great to have an additive effect on noise levels. Therefore, considered cumulatively, the Proposed Action would result in short- and long-term, less-than-significant impacts on sensitive noise receptors.

6.0 Agency and Public Comment

During development of the Draft SEA, VA notified stakeholders, including elected officials, relevant federal, state, and local agencies, and Native American Tribes, about the Proposed Action and requested stakeholder's input on environmental concerns specific to this Proposed Action. No comments were received.

VA then completed the Draft SEA and published a Notice of Availability (NOA) in the Lebanon Daily News on September 17 and 19, 2021, to announce the opportunity to review the Draft SEA and provide comments during a 30-day review period. The Draft SEA was available for review in print at the IGNC Public Information Center/Administration building; the Lebanon Community Library at 125 N 7th St, Lebanon, PA 17046; and in electronic format from VA's website at https://www.cfm.va.gov/environmental/index.asp. VA also mailed letters to stakeholders about the opportunity to review the Draft SEA and provide comments during the 30-day review period. No comments about the Draft SEA were received from the public or stakeholders during the review period.

7.0 Finding of No Significant Impact

As a result of the analysis of impacts in the Final SEA, summarized and incorporated in its entirety by reference herein, it is the conclusion of VA that, with the implementation of appropriate management, avoidance, and regulatory compliance measures included herein as Attachment A, the Proposed Action would not generate significant public controversy and would cause no significant impact of an adverse nature on the quality of the natural or human environment within the meaning of Section 102(2)(C) of the *National Environmental Policy Act* of 1969. Therefore, per the NEPA, the CEQ regulations, and 38 CFR Part 26, I am signing this FONSI, and preparation of an Environmental Impact Statement for the Proposed Action is not required.

Willie C. Marsh 1720801 — Digitally signed by Willie C. Marsh 1720801 Date: 2022.01.07 09:44:36 -05'00'

Mr. Clyde Marsh — Date
Director, North Atlantic District, NCA

FERNANDO L. FERNANDEZ 336237 — Digitally signed by FERNANDO L. FERNANDEZ 336237 Date: 2022.01.10 12:28:35 -05'00'

Mr. Fernando L. Fernández, REM — Date
Environmental Engineer
VA Construction and Facilities Management Office

APPENDIX A

Best Management Practices, Environmental Avoidance and Protection Measures, and Regulatory Compliance Measures Incorporated into the Proposed Action

AESTHETICS
Construction
▪ Construct according to the design presented in VA's approved Phase 5 expansion plan.
▪ Control fugitive dust emissions by implementing industry-standard construction BMPs, including water trucks for dust suppression, brushing loose soil off construction vehicle tires before leaving the construction site, and installing and maintaining gravel pads at construction exits to prevent tracking loose soil onto roadways.
▪ Install construction privacy fencing between the expansion area and the existing cemetery burial sections to reduce visual impacts to visitors.
▪ Plant native, non-invasive, drought-resistant vegetation following grading to stabilize soils and minimize dust generation.
Operation
▪ Professionally maintain the landscaped areas consistent with existing IGNC operations.
▪ Conduct maintenance activities (mowing, power-washing, etc.) on a schedule that limits potential disruptions to committal services and visitation activities.
AIR QUALITY
Construction and Operation
▪ Implement the dust control BMPs described for aesthetics.
▪ Utilize appropriate construction scheduling (avoid earthwork during extremely windy and dry periods).
▪ Limit engine idling to less than five minutes for equipment not immediately needed.
▪ Construction vehicles traveling on paved roads within and outside of IGNC would follow posted speed limits. This would minimize dust generated by vehicles and equipment on paved surfaces. On unpaved surfaces at the site, maintain vehicle speeds below 15 miles per hour to prevent dust generation of exposed soils.
▪ Cover dump trucks and trailers holding soil or loose material with haul tarps to prevent fugitive dust generation.
▪ On a daily basis visually monitor construction activities. During extended periods of dry weather or sustained high winds, implement additional dust control measures, as needed.
▪ Maintain equipment in good working order according to manufacturer's instruction.
CULTURAL RESOURCES
Construction and Operation
▪ Implement the "Inadvertent Discovery" plan as follows; should human remains or other cultural items as defined by the *Native American Graves Protection and Repatriation Act* (NAGPRA) be discovered during project construction, the construction contractor shall immediately cease work until VA, a qualified archaeologist, and the SHPO, and The Delaware Tribe of Indians .Tribes are contacted to properly identify and appropriately treat discovered items in accordance with applicable federal and state regulations.
▪ Preserve any live ash trees encountered within the Phase 5 expansion area. Replace dead/diseased ash trees at 2:3. The replacement trees are to be 3" caliper and of various

species suited to the region per PA SHPO correspondence with NCA in 2018 (see Final SEA Appendix B).
GEOLOGY, SOILS, AND TOPOGRAPHY
Construction
▪ Follow NCA Guidelines on slopes and grades.
▪ Prepare and implement a soil erosion and sedimentation control (SESC) plan as part of the PADEP NPDES Permit and approved by the Lebanon County Conservation District (LCCD). Implement and maintain the specified BMPs.
▪ Quickly revegetate disturbed areas following completion of construction activities to minimize the length of time that soils are exposed.
▪ Implement spill and leak prevention and response procedures for construction equipment, including maintaining a complete spill kit at the project area, to minimize the potential impact from an accidental fuel release on soil quality. Refuel equipment in designated impervious areas. Ensure construction staff are trained in proper use of spill kits and notification procedures.
▪ Re-use excess soils on-site to the maximum extent practicable.
Operation
▪ Maintain stormwater management systems such that systems meet their original design parameters.
▪ To prevent soil erosion, revegetate exposed soils and manage excess soils by stockpiling in designated covered spoils areas.
HYDROLOGY AND WATER QUALITY
Construction and Operation
▪ Implement USACE 404 and PADEP 401 State Water Quality Certification to allow for 0.02 acres of wetland impacts and the installation and operation of the proposed culvert in the unnamed stream channel.
▪ Prepare and implement a stormwater management plan consistent with Chapter 102 of PA State Code approved by LCCD. Implement and maintain the specified BMPs.
▪ Implement the soil erosion and stormwater management system BMPs listed above for Geology, Soils, and Topography.
▪ Design the Proposed Action to comply with the EISA Section 438 to the maximum extent technically feasible.
▪ Design the Proposed Action to adhere to guidance in the PA Stormwater BMP Manual (363-0300-002, December 2006) for pre- and post-development stormwater management.
▪ Route stormwater runoff from impervious surfaces to designated stormwater management systems.
▪ Apply pesticides/herbicides according to label requirements and keep these and road deicing usage to the lowest quantities possible, thereby reducing the potential for water quality impacts.
▪ Implement spill and leak prevention and response procedures for construction equipment, including maintaining a complete spill kit at the project area, to minimize the potential impact from an accidental fuel release on soil quality. Refuel equipment in designated impervious areas. Ensure construction staff are trained in proper use of spill kits and notification procedures.

▪ Design crypt fields with an adequate underdrainage system to avoid prolonged contact with groundwater per NCA design requirements.
▪ Locate, install, and operate new groundwater well in compliance with Susquehanna River Basin Commission (SRBC) requirements.
HABITAT AND WILDLIFE
Construction and Operation
▪ For any living green ash found in healthy condition, it shall not be removed. They are genetically resistant to emerald ash borer and are important for the protection of the species within the region.
▪ Avoid impacts to wildlife and habitats by developing only the necessary area needed to establish interment areas, roadways, and other physical infrastructure.
▪ Potential impacts to the northern-long-eared bat and the Indiana bat would be avoided by adhering to the USFWS's seasonal tree clearing restriction, which prohibits tree clearing from March 31 to October 1 (see USFWS letter dated 25 February 2021 in Appendix B).
▪ Should a bald eagle nest be identified prior to construction, pursuant to USFWS bald eagle guidelines, any disturbance within 660 feet of a bald eagle nest requires additional coordination and potential permitting with USFWS.
▪ To avoid potential impacts to bog turtles during intrusive subsurface work within 300 feet of their potential habitat in the Phase 4 area, VA would follow time of year restrictions by performing such work only from November 1 to March 31, as well installing 18-inch compostable filter socks adjacent to those wetlands having potential bog turtle habitat. Otherwise, VA would implement the specified avoidance measures described in USFWS's concurrence letter dated 16 November 2021 (see Appendix B).
NOISE
Construction
▪ Schedule construction activities for daylight hours during the weekday to minimize potential impacts to memorial services and nearby residential areas.
▪ Maintain mufflers and sound shielding on construction equipment and shut down construction equipment not in use for more than five minutes.
▪ Schedule notably loud construction work to avoid impacting memorial services.
▪ Provide hearing protection to workers for activities exceeding the OSHA permissible noise exposure level.
Operation
▪ Maintain routine maintenance equipment in good working order.
▪ Operate maintenance equipment during daylight working hours and away from committal services, thereby maintaining the dignity and solemnity of IGNC environment during these services.
WETLANDS and FLOODPLAINS
Construction and Operation
▪ As discussed for hydrology and water quality, implement the USACE 404 and PADEP 401 State Water Quality Certification to allow for 0.02 acres of wetland impacts and the installation and operation of the proposed culvert in the unnamed stream channel.
▪ Through the PADEP NPDES Permit, obtain permission to allow the culvert to be constructed within the PA-designated floodplain, which is located within 50-feet of either side of the top of the bank of the unnamed stream channel.

SOLID WASTE AND HAZARDOUS MATERIALS
Construction
▪ Reuse excess construction materials and soils to the maximum extent practicable. Recycle materials that cannot be reused. Properly dispose of all other materials. Follow NCA Master Construction Specifications for construction waste management.
▪ Manage any regulated building materials according to federal and state regulations.
Operation
▪ Manage new solid waste volumes with existing and similar waste streams for collection and off-site disposal.
▪ Continue implementing existing IGNC practices for hazardous materials use and storage (pesticides, herbicides, spent batteries, paints, solvents).
TRANSPORTATION AND PARKING
Construction
▪ Construction vehicles shall use designated access roads to travel to and from the construction site; travel on existing paved cemetery roadways shall be prohibited unless authorized by the IGNC Director.
▪ Design the new Honor Guard facility and parking area to eliminate the current traffic bottleneck at intersection of the current Honor Guard and committal shelter.
Operation
▪ Allow visitors to park on the shoulder, but off of the grass, on new roadways within the Phase 5 expansion area.
UTILITIES
Construction and Operation
▪ Obtain approval from East Hanover Township to connect the new satellite maintenance restrooms to the force main sewer line.