FINDING OF NO SIGNIFICANT IMPACT (FONSI)
U.S. DEPARTMENT OF VETERANS AFFAIRS
FORT SNELLING NATIONAL CEMETERY
GRAVESITE DEVELOPMENT AND CEMETERY IMPROVEMENTS
FORT SNELLING NATIONAL CEMETERY
MINNEAPOLIS, MINNESOTA

Introduction

The U.S. Department of Veterans Affairs (VA) has prepared a Final Environmental Assessment (EA) to analyze the potential environmental impacts associated with proposed construction and operation of additional burial sites and support facilities and infrastructure at Fort Snelling National Cemetery (FSNC) in Minneapolis, Hennepin County, Minnesota (Proposed Action). The Proposed Action is located entirely within the existing grounds of the cemetery. VA prepared the Final EA in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code 4321 et seq.); the President's Council on Environmental Quality (CEQ) Regulations Implementing Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508); Environmental Effects of the Department of Veterans Affairs Actions (38 CFR Part 26); VA's NEPA Interim Guidance for Projects; and VA NEPA Implementation, Directive 0067.

Purpose and Need

The purpose of the Proposed Action is to provide additional burial options at FSNC for eligible individuals and the essential support facilities and infrastructure throughout FSNC that are required to meet the needs of Veterans, family members, and staff at FSNC over the next 15 years.

While FSNC currently has interment options to support burial requests for eligible individuals, the existing cemetery and associated infrastructure requires expansion to continue supporting the needs of Veterans, family members, and staff over the next 15 years. The Proposed Action is needed to address the forecasted interment needs of Veterans and their families by ensuring that there will not be a deficiency gap in the forecasted depletion rate.

Proposed Action

The VA proposes to construct and operate additional burial sites and support facilities and infrastructure at FSNC within the existing cemetery grounds and a 60-acre area, which is currently undeveloped land within FSNC (from hereto referred to as the "cemetery expansion area"). Approximately 20,525 additional gravesites constitute sufficient burial capacity for approximately 15 years. To meet this need, the Proposed Action would provide approximately 13,850 gravesites, including both casket and cremation sites in new burial sections and columbarium niches in a new courtyard. An additional 7,030 cremation sites would be provided within the existing cemetery grounds. These new burial areas will provide a total of approximately 20,880 new gravesites.

The Proposed Action constitutes an additional construction phase of cemetery development; therefore, upgrades or improvements to facilities and infrastructure throughout the existing cemetery that are necessary to support continued operations for an additional 15 years of service would also be included in this phase of construction. The total estimated area of disturbance for all proposed improvements within FSNC is 51 acres, of which approximately 10 acres are within the cemetery expansion area.

No Action Alternative

Under the No Action Alternative, the VA would not construct the elements and features of the Proposed Action. FSNC would remain at its current capacity.

Under the No Action Alternative, the VA could not meet its mission as well as satisfy the purpose and need for the Proposed Action; however, this alternative was retained to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required under CEQ regulations (40 CFR§ 1502.14(c)).

Potential Environmental Effects

Based on the analysis in the Final EA, the Proposed Action would result in less than significant impacts. Table 1 summarizes the findings of the impact analysis by resource area.

Table 1. Summary of Impact Analysis

Resource Area	Proposed Action	No Action Alternative
Aesthetics	The Proposed Action would not change the overall aesthetic and visual characteristics of FSNC. The burial sites and support facilities and infrastructure will be designed, constructed, and operated in accordance with National Cemetery Administration (NCA) Facility Design Guide Criteria, VA Program Guide PG 18-15, H-18-8 Seismic Design Requirements, and VA Signage Design Guide Chapter 12 National Cemetery Signs, and will mirror the existing design of the Fort Snelling National Cemetery; therefore, no impact to aesthetics is anticipated.	No impact
Air Quality	Temporary releases of fugitive dust (PM_{10}) and gaseous emissions of CO, volatile organic compounds (VOC), NO_2, SO_2, and $PM_{2.5}$ from the combustion of fuel used by equipment and vehicles are anticipated during construction of the Proposed Action. It is anticipated that the use of heavy equipment for normal operations at	No impact

Resource Area	Proposed Action	No Action Alternative
	FSNC would remain unchanged with the Proposed Action. Given that air quality effects would be limited to short-term construction emissions and that construction activities would be performed in compliance with air resource protection requirements included in the NCA Master Construction Specifications, the Proposed Action would not have adverse impacts on air quality.	
Aviation	During project scoping, the Federal Aviation Administration (FAA) communicated that proposed structures associated with the project need to be entered into the Notice Criteria Tool in FAA's Obstruction Evaluation/Airport Airspace Analysis (OEAAA) system to determine if further airspace analysis needs to be conducted by the FAA in order to ensure structures are compatible from an airspace standpoint. Due to the project's proximity to the Minneapolis-Saint Paul International Airport (MSP), VA will submit proposed structures with vertical development (e.g. building, light pole, tower, crane etc.) via OE/AAA for analysis during final design in accordance with 14 CFR § 77.9. Given this coordination with FAA during final design, no impact to aviation is anticipated.	No impact
Community Services	The Proposed Action would provide the improvements and infrastructure needed for FSNC to continue to provide accessible interment services to Veterans and their families. The Proposed Action would not require additional demand for emergency services nor affect emergency response times during or after project construction; therefore, no impact to these services is anticipated.	No impact
Cultural Resources	The addition of new burial spaces through the Proposed Action will serve to enhance both the	No impact

Resource Area	Proposed Action	No Action Alternative
	significance and integrity of the FSNC as an historic property. On December 14, 2022, the State Historic Preservation Office (SHPO) concurred with the VA's finding that the Proposed Action will have no adverse effect on historic properties provided that disturbance to a known archaeological site (Site 21HE0316) is avoided by establishing a 50-foot buffer around the site, and that design plans are submitted to the SHPO for review to ensure consistency with the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68) and applicable guidelines.	
Environmental Justice	As there are no low-income or minority communities located within or adjacent to the boundaries of the FSNC, no impact to minorities or low-income populations is anticipated.	No impact
Floodplains and Wetlands	The proposed improvements would be located outside of floodplains and wetland areas; therefore, the Proposed Action would have no impact on these resources.	No impact
Geology, Topography, and Soils	A geotechnical study performed for the Proposed Action concluded that the native soils are generally suitable for support of foundations of above ground structures and for underground crypts; therefore, the Proposed Action would have no impact related to geology and soils.	No impact
Hydrology and Water Quality	The Proposed Action would result in moderate, long-term, beneficial, direct impacts on water quality by increasing dissolved oxygen levels and discouraging the growth of algae in the South Pond.	No impact

Resource Area	Proposed Action	No Action Alternative
	Both short and long-term minor, adverse, indirect impacts are anticipated on hydrology and water quality in association with the construction and operation of the cemetery improvements; however, none are significant, and impacts would be reduced by the implementation of best management practices (BMPs).	
Land Use	The entire FSNC property is owned and operated by the VA and is designated for use as a cemetery. Because the site is zoned and permitted for use as a cemetery, the land use would not require modification; therefore, the Proposed Action would have no impact to land use.	No impact
Noise	Typical existing noise-generating activities at FSNC, including the use of heavy equipment for excavation of individual gravesites and periodic ceremonial rifle salute discharges, would remain unchanged with implementation of the Proposed Action; therefore, no noise impacts associated with operations of the Proposed Action are anticipated. The Proposed Action would result in temporary increases in noise levels during construction of new burial sites and supporting infrastructure. Predicted noise levels are below thresholds identified by the Minnesota Pollution Control Agency (MPCA) and the City of Bloomington; therefore, no noise impacts from construction of the Proposed Action are anticipated.	No impact
Park and Recreational Resources	Fort Snelling State Park and the Minnesota Valley National Wildlife Refuge are located to the east and southeast of FSNC, respectively, beyond I-494 and State Highway 5. The Proposed Action would have no impact on either	No impact

Resource Area	Proposed Action	No Action Alternative
	of these park and recreational areas or their features and functions.	
Socioeconomics	The Proposed Action is anticipated to have temporary benefits to the local economy from construction activities within the area. The temporary benefits would be caused by the creation of construction jobs, incidental spending by construction workers, and the purchase of construction materials. No adverse impacts to socioeconomic resources are anticipated.	No impact
Solid and Hazardous Materials	Construction of the cemetery expansion would generate minimal quantities of solid wastes, creating a minor, short-term, adverse, direct impact. Due to the available capacity of landfills within the area and the promotion of recycling wastes, long-term, adverse, direct impacts associated with solid waste generation would be negligible.	No impact
Transportation and Parking	During construction of the Proposed Action, there would be some additional traffic associated with the mobilization/demobilization of equipment and labor and delivering. The additional vehicles accessing FSNC during construction of the Proposed Action and the temporary closure of the Main Gate during project construction are not anticipated to adversely affect traffic flow on adjacent roadways because of the availability of multiple points of ingress/egress to the cemetery.	No impact
Utilities	It is anticipated that the utility needs of the proposed improvements would be supported by existing utility providers currently under contract	No impact

Resource Area	Proposed Action	No Action Alternative
	with the cemetery and that the Proposed Action would have no adverse effects on utilities.	
Wildlife and Habitat	The Proposed Action may result in minor, long-term, adverse, direct impacts to potential summer roosting and foraging habitat for the northern long-eared bat, tricolored bat, and state-listed bat species from tree removal. Impacts to bats and to migratory birds will be minimized by not allowing tree clearing between April 1 and October 31. The Proposed Action would have a low potential for minor, long-term, adverse, direct impacts to the rusty patched bumble bee and monarch butterfly due to habitat conversion and use of herbicides and pesticides.	No impact

The project-specific protection and compliance measure listed in Attachment A would be incorporated into the Proposed Action, to the extent practicable, and ensure the impacts addressed would be less than significant.

Agency and Public Comment

As per 38 CFR Part 26 and the VA's NEPA Interim Guidance for Projects, VA has consulted with federal, state, and local agencies and Native American tribes concerning the Proposed Action. Scoping letters soliciting input on the scope of the EA were sent to elected officials (U.S. and Minnesota Congressional representatives) and various stakeholders. Consultation letters in accordance with Section 106 of the National Historic Preservation Act (NHPA) were also sent to the SHPO and other consulting parties. The Minnesota SHPO concurred with VA's findings and No Adverse Effect determination on December 14, 2022. A Notice of Public Scoping was published in the Star Tribune for two days, and a Notice of Availability (NOA) to announce the availability of the Draft EA for public review was also published in the Star Tribune on June 9 and 10, 2024.

VA published and distributed the Draft EA for a 30-day public comment period as announced by the NOA published in the Star Tribune. Review copies of the Draft EA were made available online at https://www.cfm.va.gov/environmental/index.asp and at the Oxboro Library at 8801 Portland Avenue South in Bloomington, Minnesota. VA received comments from the U.S. Army Corps of Engineers (USACE), Environmental Protection Agency (EPA), FAA, Lower Minnesota River Watershed District (LMRWD) and the Shakopee Mdewakanton Sioux Community, all of which are addressed in the Final EA.

Finding of No Significant Impact

Based on the analyses in the Final EA, which is summarized and incorporated by reference herein, VA concludes that implementing the Proposed Action would not have a significant adverse impact on the quality of the natural or human environment within the meaning of Section 102(2c) of NEPA of 1969. Therefore, preparation of an environmental impact statement is not required.

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p.p. Joshua M. De Leon
Executive Director, NCA – Midwest District
Department of Veterans Affairs

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Fernando L. Fernandez
Environmental Program Office
Office of Construction & Facilities Management

Attachment A. Protection and Compliance Measures Incorporated into the Proposed Action

Resource Area	Description	Type
Aesthetics	The burial sites and support facilities and infrastructure will be designed, constructed, and operated in accordance with NCA Facility Design Guide Criteria, VA Program Guide PG 18-15, H-18-8 Seismic Design Requirements, and VA Signage Design Guide Chapter 12 National Cemetery Signs, and will mirror the existing design of the Fort Snelling National Cemetery.	BMP
	A landscaping plan will be prepared for the Proposed Action and will include a tree planting plan consistent NCA National Shrine Commitment Operational Standards and Measures.	BMP
Air Quality	Construction activities will be performed in compliance with air resource protection requirements included in the NCA Master Construction Specifications.	BMP
	VA will request that the Contractor consider the use of recycled materials in place of carbon-intensive Portland Cement, where consistent with NCA standards, and implement, to the extent practicable, protective measures included in EPA's Construction Emission Control Checklist	BMP
Aviation	VA will submit proposed structures with vertical development (e.g. building, light pole, tower, crane etc.) via OE/AAA for analysis during final design in accordance with 14 CFR § 77.9.	Regulatory requirement
Community Services	None required.	N/A

Resource Area	Description	Type
Cultural Resources	VA will submit design plans for the Proposed Action to the SHPO at progressive design intervals (approximately 30%, 60% and 90%) to ensure conformance with Secretary of the Interior (SOI) Standards. VA will also share these plans with Minnesota Historical Society, as requested.	Regulatory requirement
	Submissions will come from one VA point of contact and will include copies of the agency's November 22, 2022 letter for reference, as well as copies of the SHPO concurrence letter.	Regulatory requirement
	Submissions may be for the overall Proposed Action, a single component of the Proposed Action, or multiple components of the Proposed Action, and the VA will specify how submissions fit within the overall Proposed Action.	Regulatory requirement
	Submissions will include photographs/descriptions of current conditions, justification for proposed changes, and discussion on how the proposed work meets SOI Standards.	Regulatory requirement
	VA will extend invitations to the SHPO for design meetings if deemed appropriate by the VA or upon request by the SHPO.	Regulatory requirement
	Submissions that include demolition will include a detailed discussion on how/why the demolition will not alter the characteristics of the historic cemetery that qualify it for listing in the National Register of Historic Places.	Regulatory requirement
	If the VA and SHPO cannot reach agreement that the submission has been designed in accordance with the SOI Standards, the VA will consult further to resolve the adverse effect of the submission pursuant to 36 CFR § 800.6.	Regulatory requirement
	To avoid disturbance of archaeological site 21HE0316, the VA will impose a 50-foot buffer	Regulatory requirement

Resource Area	Description	Type
	around the boundary of the site in the design plans. The boundary of the site will be staked in the cemetery itself as an extra precaution.	
	VA will follow the regulations at 36 CFR § 800.13 for any post-review discoveries and will ensure that the SHPO and the Shakopee Mdewakanton Sioux Community are notified within 48 hours if any previously unidentified historic properties are discovered or if unanticipated effects on historic properties are found. For any such discoveries, VA will request SHPO and Shakopee Mdewakanton Sioux Community's recommendations regarding eligibility and proposed actions.	Regulatory requirement
Environmental Justice	None required.	N/A
Floodplains and Wetlands	None required.	N/A
Geology, Topography, and Soils	None required.	N/A
Hydrology and Water Quality	A Stormwater Pollution Prevention Plan (SWPPP) identifying the project's stormwater management BMPs will be submitted to the MPCA.	Regulatory requirement
	The Proposed Action will meet standards for erosion control recommended by the LMRWD.	Regulatory requirement
	Upon completion of construction activities, all disturbed areas will be covered either with impervious surface or native grasses.	Regulatory requirement
	VA will coordinate with LMRWD, MPCA, and Metropolitan Airports Commission during final design to confirm whether the existing stormwater management ponds have sufficient capacity to accept additional runoff or if	Regulatory requirement

Resource Area	Description	Type
	additional stormwater treatment measures would be required.	
	The design of the proposed improvements will consider alternative methods of managing hydrology, including use of permeable pavement or porous pavers, if practicable.	BMP
	FSNC will continue to store, use, and dispose of maintenance and landscaping chemicals in accordance with Minnesota Department of Agriculture requirements.	Regulatory requirement
	Groundwater extraction during construction and operation of the proposed cemetery improvements would be conducted in accordance with Minnesota Department of Natural Resources (DNR) requirements.	Regulatory requirement
Land Use	None required.	N/A
Noise	None required.	N/A
Park and Recreational Resources	None required.	N/A
Socioeconomics	None required.	N/A
Solid and Hazardous Materials	VA will comply with applicable federal and state laws governing the use, generation, storage, transportation, and disposal of solid waste and hazardous materials.	Regulatory requirement
Transportation and Parking	None required.	N/A
Utilities	None required.	N/A
Wildlife and Habitat	Impacts to bats and to migratory birds will be minimized by not allowing tree clearing between April 1 and October 31.	Regulatory requirement

Resource Area	Description	Type
	Construction staging areas will be located within developed, disturbed, or maintained areas within FSNC.	BMP
	A landscaping plan will be prepared for the cemetery expansion area and will include planting of non-invasive trees and other plants consistent with NCA National Shrine Commitment Operational Standards and Measures.	BMP
	The Contractor will be required to follow standard practices for minimizing the spread of invasive plants, such as washing construction equipment before entering or leaving the site.	BMP

The following federal, state, and/or local environmental permits and approvals were identified as potentially being required as part of the Proposed Action. This list may not be exhaustive, and the selected Contractor will be responsible for any additional compliance and permits.

- National Pollutant Discharge Elimination System Construction General Permit (CGP)
    - The CGP is required for land disturbances of one acre or more that have the potential to discharge stormwater to waters of the U.S. or a storm sewer.
    - This permit is issued by MPCA and requires the development and implementation of a SWPPP.

- LMRWD Rule B: Erosion and Sediment Control Permit
    - This permit is required for projects that involve land-disturbing activities of one acre or more.

- LMRWD Rule D: Stormwater Management Permit
    - This permit is required for projects involving new impervious surfaces greater than one acre.

- Water Appropriation Permit Amendment
    - DNR requires a permit for surface or groundwater appropriation that exceeds 10,000 gallons of water per day or 1.0 million gallons per year.
    - VA will coordinate with DNR to obtain an amendment to the existing water appropriation permit for FSNC to include the additional irrigation well and increased volume of groundwater appropriation.