FINDING OF NO SIGNIFICANT IMPACT
U.S. DEPARTMENT OF VETERANS AFFAIRS
JEFFERSON BARRACKS NATIONAL CEMETERY
PROPOSED SYLVAN SPRINGS EXPANSION
SAINT LOUIS COUNTY, MISSOURI

BACKGROUND

The U.S. Department of Veterans Affairs (VA) has prepared a Final Environmental Assessment (EA) to analyze the potential environmental impacts associated with the Proposed Action to expand north onto VA owned land currently leased by St. Louis County and utilized for Sylvan Springs Park and construct a columbarium at Jefferson Barracks National Cemetery (JBNC) in St. Louis, St. Louis County, Missouri. The EA was 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).The attached EA is incorporated by reference into this Finding of No Significant Impact (FONSI).

The purpose of the Proposed Action is to provide additional burial sites at JBNC for eligible individuals by expanding north onto the VA owned 37.6-acre parcel and constructing a columbarium within the current JBNC in order to meet the needs of Veterans and family members.

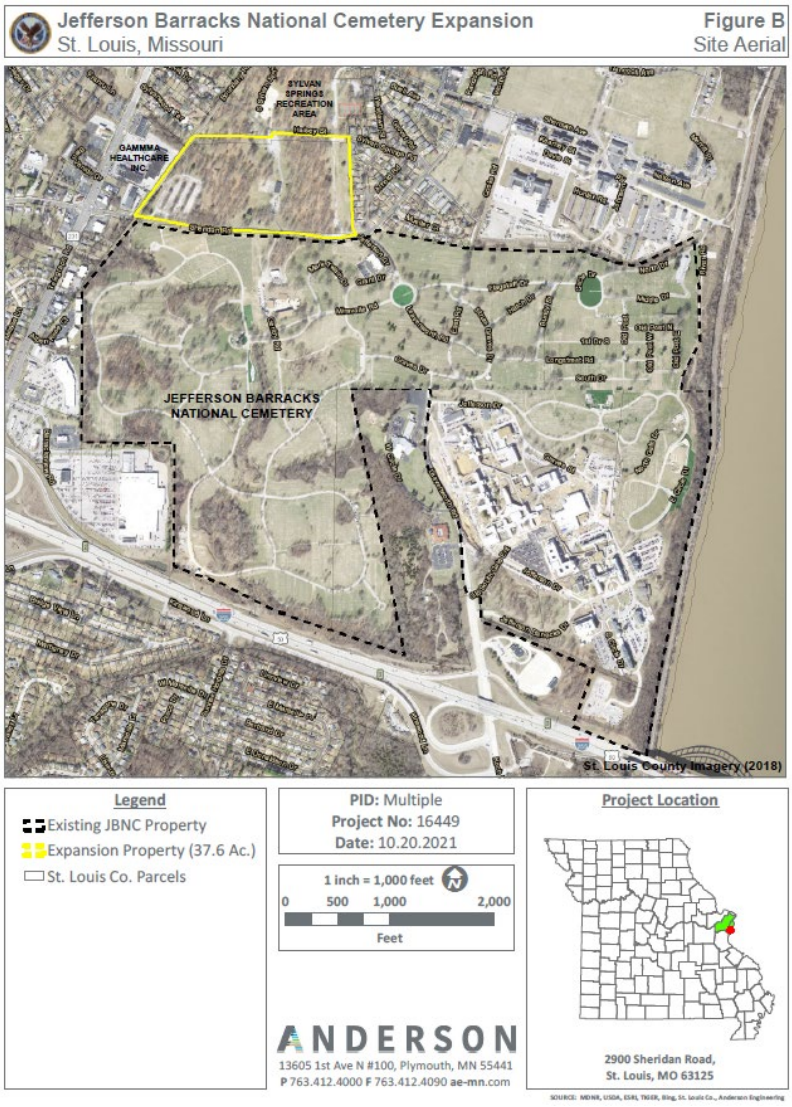
The need for the Proposed Action is to address the projected depletion of remaining interment capacity at JBNC by providing a larger, expanded cemetery. The existing JBNC is the only National Cemetery in the region that is open to new interments, with the next closest that is accepting new burials being Camp Butler National Cemetery located more than 115 miles from JBNC in Springfield, Illinois. JBNC is nearing its burial capacity; VA estimates that the existing burial space at the cemetery will be depleted in approximately five years. The Proposed Action would provide VA additional capacity needed to meet its burial objectives for eligible Veterans in the regional St. Louis area.

DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

Proposed Action

The Proposed Action would expand north onto VA owned land currently leased by St. Louis County and utilized for Sylvan Springs Park and construct a columbarium at Jefferson Barracks National Cemetery (JBNC) in St. Louis, St. Louis County, Missouri). VA National Cemetery Administration (NCA) operates the cemetery. The proposed expansion would occur on a site that consists of one 37.6-acre parcel acquired by VA in 2018 consisting of restroom/concession building and picnic shelter, paved and gravel parking lots outlined in yellow in Figure B Site Aerial below. Additionally, a new columbarium and associated parking would be added within the existing Jefferson Barracks National Cemetery.

VA would follow the NCA Facilities Design Guide in the JBNC expansion design. Prior to construction, VA would obtain all applicable Federal, State, and local permits for the proposed cemetery development from appropriate government authorities. VA would avoid any significant onsite environmental resources through sensitive site design, including avoidance of significant natural resources.



No Action Alternative

Under the No Action Alternative, the VA would not expand onto the VA-owned Sylvan Springs expansion parcel. If the land cannot be utilized by the VA for cemetery expansion, it would most likely be sold. JBNC would continue operation until all space had been utilized in the existing cemetery and then cease accepting new burials. This alternative would not meet the purpose and need of the project but is retained to allow comparative study.

SUMMARY OF ENVIRONMENTAL ANALYSIS

The Final EA analyzed the existing physical, environmental, cultural, and socioeconomic conditions at the Cemetery, the Proposed Action area, and its general vicinity, with emphasis on those resources potentially affected by the Proposed Action. Effects were 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. Table 1 summarizes these findings and the potential environmental effects of the Proposed Action Alternative and the No Action Alternative. A detailed analysis of the potential effects to these resource areas is provided in the Final EA.

Table 1. Summary of Resource Area Impacts

Resource Area	Proposed Action Alternative	No Action Alternative
Aesthetics	• Minor temporary adverse impacts during construction.	• No impacts.
Air Quality	• Temporary minor adverse impacts during construction. • Minor adverse impacts from increased traffic as cemetery builds out.	• No impacts.
Cultural Resources	• No adverse effect to surrounding NRHP-Eligible properties/districts including existing JBNC. • Adverse effect to 1952 Ordinance Shelter mitigated via MOA stipulations.	• No impacts.
Geology, Topography, and Soils	• No adverse impacts anticipated if BMPs and recommendations are followed to avoid impacts to karst features in the vicinity.	• No impacts.
Hydrology and Water Quality	• Implement BMPs to limit adverse impacts during construction related to soil erosion and sedimentation. • Designed stormwater features and systems will be utilized to avoid impacts to downstream water resources.	• No impacts.
Wildlife and Habitat	• No adverse impacts eagles and migratory birds if BMPs are implemented. • No adverse effects to ESA listed species.	• No impacts.
Noise	• Temporary adverse effect during construction mitigated with BMPs. • Minor adverse impact from traffic, burial gun salutes similar to existing conditions directly south at existing JBNC.	• No impacts.
Land Use	• No impacts.	• No impacts.
Floodplains, Wetlands, Coastal Zone Management	• No adverse impacts to floodplains or designated coastal zones. • Potential minor adverse impact in existing JBNC for wetland impacts, Section 404 and additional permitting as needed.	• No impacts.
Socioeconomics	• Positive impacts to regional economy via design, construction, and maintenance jobs.	• No impacts.
Community Services	• Minor adverse impact from loss of parkland.	• No impacts.
Solid Waste and Hazardous Materials	• Temporary adverse impacts during demolition and construction. Mitigation via BMPs to lessen impacts to less than significant. • No adverse impacts anticipated during operation.	• No impacts.
Transportation and Parking	• Temporary adverse impacts during construction as vehicles and equipment go to and from the site. • Minor increases anticipated during operation of cemetery, but roadways have capacity to handle additional traffic. • All parking would be designed for the expansion to accommodate additional visitors.	• No impacts.
Utilities	• No impacts.	• No impacts.
Environmental Justice	• No impacts.	• No impacts.
Cumulative Impacts	• No anticipated impacts, Proposed Action has been planned by St. Louis County and VA.	• No impacts.

AGENCY AND PUBLIC COMMENT

VA consulted the federal, state, local, tribal, and elected officials listed in Section 5.0 Public Involvement of the Final EA as part of an initial scoping process. A scoping notice was also posted to the VA website and published in the St. Louis Post Dispatch on February 10 and 12, 2023. The Draft EA was published and distributed for a 30-day public comment period as announced by a Notice of Availability (NOA) provided to the stakeholders consulted and published in the St. Louis Post Dispatch on June 9 and 11, 2023. The draft EA and NOA was also posted to the VA website and hard copies made available at the St. Louis County Library – Cliff Cave Branch and JBNC.

Comments were received during the 30-day scoping period and the 30-day public comment period from the Miami Tribe of Oklahoma, Missouri Department of Natural Resources, Missouri Department of Transportation, Osage Nation, U.S. Environmental Protection Agency (EPA), and U.S. Fish and Wildlife Service. Stakeholder information and comments have been incorporated into the Final EA, where and as appropriate. Additional details can be found in Section 5.0 Public Involvement of the Final EA and copies of relevant correspondence can be found in Appendix B. Agency Coordination and Consultation of the Final EA.

FINDING OF NO SIGNIFICANT IMPACT

This FONSI is based on the attached Final EA. After review of the Final EA, VA concludes that the Proposed Action would not generate significant controversy or have a significant adverse effect on the quality of the human environment, provided the mitigation measures and monitoring laid out in the Final EA and Attachment A of this FONSI are followed. VA will implement these measures.

This analysis fulfills the requirements of the NEPA and is consistent with the VA and CEQ regulations implementing the NEPA. An Environmental Impact Statement is not required.

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Joshua M. de Leon
Executive Director, NCA - Midwest District
Department of Veterans Affairs

FERNANDO FERNANDEZ ORTIZ

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Office of Construction & Facilities Management

Attachment A. Mitigation Measures and Monitoring

APPENDIX A. MITIGATION MEASURES AND MONITORING

Mitigation measures that are laid out here were compiled within the EA. Mitigation measures are to be used to avoid, minimize, rectify, reduce, or compensate for the adverse effects of an impact to the environment.

VA and its contractors would implement BMPs and satisfy all applicable regulatory requirements in association with the design, construction, and operation of the cemetery expansion and columbarium construction. These mitigation measures are described in the Final EA and are included as components of the Proposed Action Alternative. In general, implementation of such mitigation measures would maintain impacts at acceptable levels for all resource areas analyzed.

Affected Environment Area	BMPs/Minimization Measures
Aesthetics	• Develop the cemetery in concert with the Site's natural topography. Maintain some natural treed areas. • Use vegetative buffers to enhance viewscape, particularly near adjacent residential properties. • Comply, to the extent practicable, with the development standards of the St. Louis County Code of Ordinances (SLCOO).
Air Quality	• Complete pre-demolition asbestos surveys and remove identified asbestos containing materials (ACM) from buildings prior to demolition. • Use appropriate dust suppression methods (such as the use of water, dust, palliative, covers, suspension of earth moving in high wind conditions) during onsite demolition/construction activities. • Ensure fugitive particulate matter emissions, such as dust, resulting from the project do not remain on surfaces or in the air beyond the property line of origin. 10 CSR 10-6.170 restricts the emission of particulate matter to the ambient air beyond the premises of origin. • Stabilize disturbed area through re-vegetation or mulching if the area would be inactive for several weeks or longer. • Implement measures to reduce DPM emissions from construction equipment, such as reducing idling time and using newer equipment with emissions controls. • The open burning of refuse and trade waste is restricted according to 10 CSR 10-6.045. Construction, demolition, and trade waste cannot be open burned, except for untreated wood. Brush from land clearing activities may be burned if the burning is conducted outside the city limits and greater than 200 yards from the nearest occupied structure. • According to the St. Louis County Revised Ordinances Title VI Chapter 612.345, St. Louis County prohibits or restricts open burning of any waste material. • Comply with the applicable MDNR and St. Louis County Air Quality Regulations. Secure any required minor air emissions permits from MDNR, as appropriate and prior to construction.

Cultural Resources	• Follow the stipulations documented in the MOA signed 7/28/2023.
Geology and Soils	• Control soil erosion and sedimentation impacts during construction by implementing erosion prevention measures and complying with the MSD National Pollution Discharge Elimination System (NPDES) permitting process. • Implement effective controls per a site-specific Stormwater Pollution Prevention Plan (SWPPP). • The NPDES permit would require stormwater runoff and erosion management using BMPs, such as earth berms, vegetative buffers and filter strips, and spill prevention and management techniques. The construction contractor would implement the sedimentation and erosion control measures specified in the NPDES permit and the SWPPP to protect surface water quality.
Hydrology and Water Quality	• Control soil erosion and sedimentation impacts during construction by complying with the MSD NPDES permit and the SWPPP. • Design cemetery to maintain existing Site drainage, including buffer of undisturbed land around stormwater drainage channels. • Improvements would be designed in accordance with the requirements of EO 13514/EISA Section 438 with respect to stormwater runoff quantity and characteristics. • Ensure the design of the cemetery includes sufficient on-site stormwater management so as not to adversely affect the water quantity/quality in receiving waters and/or offsite areas. Obtain appropriate permits for off-site stormwater discharges.
Wildlife and Habitat	• Conduct seasonal tree clearing to prevent potential impacts to migratory birds, eagles, and identified bat species. • If it is not practical to clear outside of this time frame, a qualified biologist would survey the site prior to tree and brush clearing to ensure that no identified species or active nests are disturbed. • Native species should be used to the extent practicable when re-vegetating land disturbed by construction to avoid the potential introduction of non-native or invasive species. • Proper cleaning of construction equipment should be done to the extent practicable, to prevent the spread of non-native/invasive species.
Noise	• Post signage 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 8:00 a.m. and 6:00 p.m. on Monday through Friday, or during normal, weekday, work hours. • Locate stationary operating equipment as far away from sensitive receptors as possible. • Select material transportation routes as far away from sensitive receptors as possible.

	• Shut down noise-generating heavy equipment when it is not needed and maintain equipment per manufacturer's recommendations to minimize noise generation. • Encourage construction personnel to operate equipment in the quietest manner practicable (e.g., speed restrictions, retarder brake restrictions, engine speed restrictions, etc.).
Land Use	• None required.
Floodplains, Wetlands, and Coastal Zone Management	• If construction within the existing JBNC will have wetland impacts, complete appropriate permitting under Section 404 of the CWA and any other applicable permits.
Socioeconomics	• None required.
Community Services	• None required.
Solid and Hazardous Waste	• Remove any identified ACM from buildings prior to demolition. • Comply with VA Standard Operating Procedures and applicable Federal and State laws governing the use, generation, storage, transportation, and disposal of solid and hazardous materials.
Transportation and Parking	• Work with the MODOT and St. Louis County, as applicable, during the cemetery expansion design to identify and implement roadway improvements, if necessary. • Coordinate with the MODOT and St. Louis County to ensure that construction and operational traffic are considered in the planning of future transportation improvements in this vicinity. • Ensure demolition and construction activities do not adversely affect traffic flow on local roadways; construction would be timed to avoid peak travel hours. • Ensure debris and/or soil is not deposited on local roadways during the demolition and construction activities.
Utilities	• Complete a Site design that retains existing stormwater system and includes new stormwater management features, as necessary, so as to not adversely affect water quality/quantity onsite and downstream. • Obtain appropriate permits for stormwater discharges. • Submit detailed design plans to each utility provider to determine the specific connection/extension requirements and implement the necessary requirements.
Environmental Justice	• None required.