FINDING OF NO SIGNIFICANT IMPACT
U.S. DEPARTMENT OF VETERANS AFFAIRS
GREAT LAKES NATIONAL CEMETERY
PHASE 3 GRAVESITE DEVELOPMENT
AND CEMETERY IMPROVEMENTS
HOLLY, MICHIGAN

Introduction

A Final Environmental Assessment (EA) was prepared to identify, analyze, and document the physical, environmental, cultural, and socioeconomic impacts associated with the U.S. Department of Veterans Affairs' (VA) Proposed Action to expand and improve the Great Lakes National Cemetery (National Cemetery) in Holly, Michigan.

Purpose and Need

The purpose of the Proposed Action is to provide fifteen years of additional interment capacity to serve the projected burial needs of Veterans in the Great Lakes region. The Proposed Action is needed to meet the National Cemetery Administration's (NCA's) goal of providing eligible Veterans and their family members with reasonable access to VA interment options.

The Proposed Action serves to further NCA's mission in honoring Veterans and their eligible family members with final resting places in national shrines and with lasting tributes that commemorate their service and sacrifice to our nation. The Proposed Action, representing the Phase 3 expansion, would provide additional interment capacity, as well as develop facility infrastructure for future expansions.

Proposed Action

The VA Office of Construction and Facilities Management is considering implementing a phased expansion of the Great Lakes National Cemetery. VA's proposed Phase 3 expansion project would develop approximately 30 acres of undeveloped land to provide approximately 36,200 gravesites, including both casket and cremation sites in new burial sections. This major construction project is intended to provide 15 years of service. Additionally, the Proposed Action will include the following development and improvements including access roads and parking lots, columbarium structures, cold storage building, fueling station and aboveground fuel storage tank, irrigation pump house, full renovation/reconfiguration of the Administration Building and maintenance facility, and the installation of Service Seals for the Committal Shelters.

The Proposed Action will meet the NCA's goal of providing eligible Veterans and their family members with reasonable access to VA interment options. To fulfill its mission to honor

Veterans, VA has determined that there is a need to continue providing Veteran burial options at the Great Lakes National Cemetery and to ensure future interment availability. These benefits are provided by VA under the National Cemetery Act of 1973 and Chapter 24 of Title 38, United States Code.

No Action Alternatives Considered

Under the No Action Alternative, the Proposed Action would not be implemented. The Great Lakes National Cemetery would remain in its current state and the requirements of the National Cemeteries Act of 1973 would not be fulfilled. The No Action Alternative does not meet the purpose and need nor support NCA's goal of providing eligible Veterans and their family members with reasonable access to VA interment options. However, analysis of the No Action Alternative is required by CEQ regulations. It also provides a benchmark for comparing and analyzing the effects of the other alternatives.

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 physical changes to the National Cemetery would not detract from the aesthetics. Aesthetic impacts during construction activities would be temporary and less than significant. Physical changes to the National Cemetery would be consistent with existing architecture as well as landscaping. Aesthetic impacts would be **less than significant**.	None
Air Quality	Construction activities would have short-term minor impacts related to emissions and fugitive dust. Combined construction and operation emissions would be substantially below the General Conformity maintenance area de minimis threshold. Air quality impacts would be **less than significant**.	None

Greenhouse Gas Emissions and Climate Change	Construction equipment and vehicles would emit greenhouse gases while operating. VA would use lower emitting equipment/vehicles and local contractors and minimize vehicle/equipment idling to the extent feasible. Greenhouse gas emissions and climate change effects are anticipated to be **less than significant**.	None
Cultural and Historic Resources	The Michigan State Historic Preservation Office concurred with VA's determination that the Proposed Action will **not adversely affect** any historic or cultural resources.	None
Geology, Topography, and Soils	Ground-disturbing activities would have minimal changes to topography. Ground disturbances would be stabilized during operation and all permit requirements would be met. Impacts to geology and soils would be **less than significant**.	None
Hydrology and Water Quality	Onsite stormwater engineering controls to retain and manage stormwater flow would be implemented and Clean Water Act permit requirements would be met. Construction activities would comply, to the extent practicable, with local agencies' requirements to minimize adverse effects to Waters of the U.S. and best management practices (BMPs), resulting in **less than significant** impacts to hydrology and downgradient water quality.	None
Wildlife and Habitat	The National Cemetery does not contain any critical habitat for State- or Federally-listed species. United States Fish and Wildlife Service (USFWS) time-of-year restrictions for clearing of vegetation, including trees, would be implemented to avoid impacts to migratory birds and bats, occurring only between October 1 through March 31. The project site will be reviewed during the Eastern Massasauga active season (April-September) by a qualified ecologist and individual experienced in surveying the species, to confirm presence or absence. Identification and awareness training regarding the potential presence of the Eastern	None

	Massasauga would be provided to construction personnel. No effects to designated habitat or listed species are anticipated, resulting in **less than significant** impacts to wildlife and habitat.	
Noise	Construction activities would result in **minor short-term noise impacts**. Long-term operational noise within the area of the Proposed Action would be consistent with the existing cemetery operations associated with maintenance activities and ceremonial rifle salutes. There are **no significant long-term operational noise impacts**.	None
Land Use	The National Cemetery would remain compatible with surrounding land uses, resulting in **less than significant** impacts.	None
Floodplains and Wetlands	Temporary impacts to a portion of the identified wetlands, streams, and Fagan Lake are anticipated to occur from construction activities. VA will obtain the necessary permits from U.S. Army Corps of Engineers and water quality certification from the Michigan Department of Environment, Great Lakes, and Energy Water Resources Division for temporary impacts to jurisdictional waters. Since a portion of the Proposed Action is within a floodplain, a Permit for Floodplain Development would be required from the United States Federal Emergency Management Agency. **No significant impacts** to floodplains or wetlands are anticipated.	None
Socioeconomics	There would be **short-term beneficial impacts** to local employment and personal income during construction activities.	None
Community Services	Construction activities at the National Cemetery are not expected to place additional substantial demands on police, fire, emergency services, and other community services, resulting in **no significant impacts**.	None

Solid Waste and Hazardous Materials	During construction, the presence and use of petroleum and hazardous substances could increase the potential for accidental release or spill; however, minimization measures would make this potential impact less than significant. A fueling station and 500-gallon diesel fuel aboveground storage tank would be installed at the cemetery; however, VA would follow all appropriate fueling procedures to prevent leaks or spills. The presence of the diesel fuel tank is **not anticipated to result in adverse impacts** to the National Cemetery.	None
Traffic, Transportation, and Parking	Project activities are not anticipated to significantly impact existing or future traffic patterns surrounding the National Cemetery. Impacts to traffic during construction would be **temporary, localized, and less than significant**.	None
Utilities	There would be a negligible increase in the consumption of utilities, including electricity, natural gas, potable water, and stormwater/sanitary sewer discharges. Impacts would be **less than significant**.	None
Environmental Justice	There would be no disproportionate impacts to disadvantaged populations, resulting in **less than significant impacts**.	None

The project-specific protection and compliance measures 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

VA published a notice of scoping on October 6 and 9, 2024 in the Tri-County Times as well as the VA Construction and Facilities Management and Holly Township Library websites. The notice described the Proposed Action and solicited public comments with a deadline of 30 days after the publishing date, or November 6, 2024. VA mailed letters to federal, state, and local agencies; public officials; Federally-recognized Tribes; and any identified special interest groups. Similar to the notices published in the newspaper, the letters included information on the Proposed Action, comment period, and instruction on submitting comments. VA received one scoping response from the Michigan Department of Natural Resources regarding potential impacts to local reptile and/or amphibian populations from the construction of a road through the wetland complex

between Fagan Lake and Round Lake on the southern portion of the site. VA recognizes the importance of wetlands as habitat and movement corridors for reptiles and amphibians. Concrete culverts will be installed in these areas to minimize hydrologic and biological impacts.

VA initiated Section 106 consultation with the Michigan State Historic Preservation Office (SHPO) in April 2024 and received concurrence with VA's finding of No Adverse Effect as a result of the Proposed Action on April 26, 2024. However, the Great Lakes National Cemetery is a historic district eligible for the NRHP. The Michigan SHPO determined that because Phase 3 development will continue to expand and improve the National Cemetery in accordance with established NCA design guidelines and maintain the respectful memorial landscape of the existing National Cemetery, the project will not adversely affect any of the qualities of Great Lakes National Cemetery that qualify it for listing in the NRHP.

VA requested informal consultation with USFWS pursuant to Section 7 of the ESA. USFWS responded on June 14, 2024, documenting concurrence for all specified Federally threatened and endangered species and designated critical habitat that may occur in the proposed project area, including the Eastern Massasauga and Poweshiek Skipperling.

VA published and distributed the Draft EA for a 30-day public comment period as announced by a Notice of Availability published in the Tri-County Times on January 5 and 8, 2025. VA mailed or emailed letters to federal, state, and local agencies; public officials; Federally recognized Tribes; and any identified special interest groups. Similar to the notices published in the newspaper, the letters included information on the Proposed Action, comment period, and instruction on submitting comments. Review copies of the Draft EA were made available on the VA Construction and Facilities Management website and at the Holly Township Library. VA received two comments on the Draft EA, 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 the National Environmental Policy Act (NEPA) of 1969. Therefore, preparation of an environmental impact statement is not required.

DONALD OWENS Digitally signed by DONALD OWENS
Date: 2025.02.23 19:40:54 -05'00'

_____

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

FERNANDO FERNANDEZ ORTIZ Digitally signed by FERNANDO FERNANDEZ ORTIZ
Date: 2025.02.05 13:58:44 -05'00'

_____

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	Design new structures to be architecturally and visually consistent with the current buildings located at the National Cemetery.	BMP
	Maintain landscaped areas, buildings, roadways, and signage.	BMP
	Incorporate existing topography and natural features into site design, wherever possible.	BMP
	Conduct construction activities with a sensitivity toward maintaining the dignity and solemnity of the National Cemetery environment during interment services.	BMP
Air Quality	Use appropriate fugitive dust suppression measures.	BMP
	Use newer construction equipment with emissions controls and maintain equipment.	BMP
	Reduce idling of construction equipment and vehicles to minimize exhaust emissions.	BMP
	Perform all demolition work under licensed contractors.	Regulatory requirement
	Use standard measures to control dust to reduce Lead Bearing Substances dust emissions during renovation.	BMP
	Implement site-specific SWPPP and erosion and sediment control plan to minimize and avoid fugitive dust as applicable.	Regulatory requirement
Greenhouse Gas Emissions and Climate Change	Use low-GHG-emitting technologies.	BMP
	Procure construction materials with lower amounts of embodied carbon.	BMP
	Utilize local contractors and shared transportation where feasible to minimize mileage traveled by workers to and from the site.	BMP
Cultural and Historic Resources	In the event human remains or other cultural items, as defined by the Native American Graves Protection and Repatriation Act , are found during construction or operation of the National Cemetery, work would	Regulatory requirement

	be halted in the area and the appropriate authorities and Tribes would be contacted.	
	If the project's scope of work changes from that which has been submitted to and approved by the Michigan SHPO, changes must be emailed to Preservation@Michigan.gov and to Scott Slagor (Slagors2@michigan.gov) for review and comment. Further, respective Tribes would be notified for consultation.	Regulatory requirement
Geology and Soils	Implement an erosion and sediment control plan to address soil disturbance during construction that includes the implementation of erosion and sediment control devices and stabilization practices.	Regulatory requirement
Hydrology and Water Quality	Use environmentally sensitive site design, stormwater pollution prevention controls, good engineering practices, and construction BMPs.	BMP
	Implement appropriate groundwater engineering controls and dewatering practices should groundwater be encountered during construction.	BMP
	Locate machinery servicing and refueling areas away from waterways to reduce the possibility and minimize the impacts of any accidental spills or discharges.	BMP
Wildlife and Habitat	Install concrete culverts in wetland areas of development to minimize hydrologic and biological impacts.	BMP
	Operate all vehicles traveling within and around the project area in accordance with posted speed limits. Vehicles should avoid snakes in the road.	BMP
	Restrict all vegetation removal and disturbance (e.g., burning, mowing, trimming) to months when the Eastern Massasauga species is likely to be hibernating (i.e., October to mid-March).	BMP
	Perform limited vegetation and tree clearing only during the USFWS-designated winter clearing window for bat species (October 1 through March 31). Limiting vegetation removal to occur only between October 1 through March 31 will avoid impacts to migratory birds.	BMP

	Provide identification and awareness training regarding the potential presence of Eastern Massasauga prior to the start of construction activities and as additional machine operators and construction personnel are integrated into the project.	BMP
	Immediately stop construction if an Eastern Massasauga is observed. Cease activities until proper agency coordination is conducted.	BMP
	Limit vegetation removal within the area to the extent possible.	BMP
Noise	Limit construction-related noise near sensitive receptors and coordinate proposed construction activities in advance with any nearby sensitive receptors.	BMP
	Shut down noise-generating equipment when it is not needed and maintain equipment per manufacturer's recommendations to minimize noise generation.	BMP
	Utilize broadband, self-adjusting backup alarms in lieu of backup-beepers consistent with applicable safety requirements and encourage construction personnel to operate equipment in the quietest manner practicable.	BMP
	Locate stational operating equipment as far away from sensitive receptors as possible.	BMP
	Select material transportation routes as far away from sensitive receptors as possible.	BMP
	Maintain equipment per manufacturer's recommendations to minimize noise generation.	BMP
Land Use	As a federal agency operating within Federal lands, VA is not subject to local zoning regulations. None required.	N/A
Floodplains and Wetlands	Development of mitigation and stormwater management plans, if required for CWA permitting.	Regulatory requirement

	Clearly demarcate designated work areas.	BMP
	Avoid floodplains and Waters of the United States, where practicable.	BMP
	Maintain a minimum 50-foot buffer of undisturbed land around the adjacent wetland.	BMP
	Inspect and maintain construction vehicles in good working order and maintain a spill kit.	BMP
Socioeconomics	Secure the construction area to prevent unauthorized access to the property and to reduce the potential of health and safety risks.	Protection Measure
Community Services	Coordinate any short-term road closures with the local emergency and transportation services to prevent significant disruption to their services.	BMP
Solid Waste and Hazardous Materials	Store and appropriately label petroleum products and hazardous materials in approved containers.	BMP
	Store containers on a level and impervious surface.	BMP
	Use secondary containment systems around fuel storage containers during refueling activities. Should a spill or release occur, any impacted soil would be properly handled per Federal and State laws and regulations.	Regulatory requirement
Traffic, Transportation, and Parking	Coordinate with Holly Township on any short-term road closures during construction.	BMP
	Sequence construction to the extent feasible to minimize impacts to traffic or transportation patterns.	BMP
Utilities	None required.	N/A
Environmental Justice	None required.	N/A

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 developer will be responsible for any additional compliance and permits.

United States Army Corp of Engineers (USACE) Nationwide Permit 51

A USACE Nationwide Permit 51 must be obtained if jurisdictional Waters of the United States (WOTUS) are anticipated to be impacted during the development of the Great Lakes National Cemetery Phase III Expansion Area. Broadly, WOTUS are water features that either are navigable or connect to a navigable waterway. In the case of the Great Lakes National Cemetery Phase III Expansion Area, WOTUS anticipated to be impacted may include wetlands identified by ECS located in the northwestern, central and southern portions of the on the Great Lakes National Cemetery Phase III Expansion Area. However, whether the, identified wetlands are WOTUS under federal jurisdiction must still be determined by the United States Army Corps of Engineers (USACE). In the event that wetlands and water features anticipated to be impacted during the Great Lakes National Cemetery Phase III Expansion Area project are determined to be under federal jurisdiction, a Nationwide Permit 51 must be obtained for development activities at the Great Lakes National Cemetery Phase III Expansion Area. Potential wetland and water features anticipated to be impacted by the project are depicted in the Wetland Delineation Report for the Great Lakes Cemetery Phase III Expansion Area dated January 12, 2024, and provided under separate cover. The USACE Nationwide Permit 51, along with Michigan Department of Environment, Great Lakes, and Energy (EGLE) Water Resources Division (WRD) permits, can be applied for through a Joint Permit Application (JPA) submitted to the Michigan EGLE.

Michigan EGLE WRD General Permit, Minor Project, or Individual Permit

A Michigan EGLE WRD General Permit (GP), Minor Project (MP), or Individual Permit must be obtained if water features under Michigan jurisdiction are anticipated to be impacted by the development of the Great Lakes National Cemetery Phase III Expansion Area. The wetlands and streams identified by ECS in the northwestern, central, and southern portions of the Great Lakes National Cemetery Phase III Expansion Area may be under Michigan jurisdiction. Potential wetland and water features anticipated to be impacted by the project are depicted in the Wetland Delineation Report for the Great Lakes Cemetery Phase III Expansion Area dated January 12, 2024, and provided under separate cover. Whether or not the wetlands and water features within the Great Lakes National Cemetery Phase III Expansion are under Michigan's jurisdiction is determined by the Michigan EGLE. The Michigan EGLE WRD GP, MP, or Individual Permit, along with the USACE Nationwide 51 Permit and the Michigan EGLE WRD Floodplain Permit, can be applied for through a JPA submitted to the Michigan EGLE.

Michigan EGLE WRD Floodplain Permit

A floodplain permit from the Michigan EGLE must be obtained prior to the alteration and/or occupation of a 100-year floodplain. However, if the floodplain affected is less than two square-miles, the Michigan EGLE may determine that a floodplain permit is not required. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) 26125C0151F, portions of the Great Lakes National Cemetery Phase III Expansion Area are

located within a 100-year floodplain. Whether or not a floodplain permit is required for the proposed development activities at the Great Lakes National Cemetery is determined by the Michigan EGLE. The Michigan EGLE WRD Floodplain Permit, along with the Michigan EGLE GP, MP, or Individual Project and USACE Nationwide Permit 51, can be applied for through a JPA submitted to the Michigan EGLE.

Michigan EGLE WRD National Pollution Discharge Elimination System (NPDES) Permit

A Michigan EGLE WRD National Pollution Discharge Elimination System (NPDES) permit is required since construction storm water is anticipated to be discharged to surface waters under Michigan's jurisdiction during the development of the Great Lakes National Cemetery Phase III Expansion Area development.

Oil And Oil-Containing Products Spill Prevention Measures

A Pollution Incident Prevent Plan (PIPP) is required if the total aggregate of capacity of oil and oil containing product containers within the at the Great Lakes National Cemetery Phase III Expansion Area equal or exceed 1,320 gallons at any time during the construction period. The PIPP must conform to requirements set forth in 40 Code of Federal Regulations (CFR) 112 and Part 5 of the Michigan Administrative Code of the Department of Environment, Great Lakes, and Energy. The PIPP contains information pertaining to the facility location, contact information, and construction; details pertinent information regarding the oil and oil-containing products stored on-site; identifies spill prevention measures and pathways to which spilled materials may enter the environment; designates an on-site spill prevention and control coordinator; and outlines spill and release reporting procedures for various state, federal, and private entities.

Oakland County, Michigan Soil Erosion and Sedimentation Control (SESC) Permit

A SESC permit from Oakland County, Michigan must be obtained when disturbing one or more acres of earth within 500 feet of a water's edge in Oakland County. As disturbance of more than one acre of land within 500 feet of a water's edge is anticipated as part of the development of the Great Lakes National Cemetery Phase III Expansion Area, a SESC permit from Oakland County must be obtained.

Michigan EGLE Air Quality Division (AQD) Permit to Install (PTI)/New Source Review (NSR)

Depending on the fuel source and capacity of the proposed heater to be installed at the maintenance facility at the Great Lakes National Cemetery Phase III Expansion Area maintenance facility, a Permit to Install (PTI)/New Source Review (NSR) may need to be obtained from the Michigan EGLE AQD. However, if the proposed heater to be installed at the maintenance facility meets the exemption criteria, then a PTI/NSR is not required.

Michigan EGLE AQD Renewable Operating Permit (ROP)

A Renewable Operating Permit (ROP) is required when major sources and some smaller sources of air pollution are operated. A source is considered a major source if it will emit, or has the potential to emit, 10 tons of any one hazardous air pollutant (HAP) in one year; 25 tons of any combination of HAPs in one year; or 100 tons of any other regulated air contaminant in one year. Depending on the amount of emissions expected from the proposed heater to be installed as part of the Great Lakes National Cemetery Phase III Expansion Area development activities, a ROP may be required.