FINDING OF NO SIGNIFICANT IMPACT (FONSI)

DEPARTMENT OF VETERANS AFFAIRS
PHASE 3 EXPANSION AND IMPROVEMENTS
FORT SAM HOUSTON NATIONAL CEMETERY
CITY OF SAN ANTONIO, TEXAS
PROJECT NUMBER: 846CM2045

The US Department of Veterans Affairs (VA) assessed the potential impacts associated with the proposed phase 3 expansion and improvement of the Fort Sam Houston National Cemetery (FSHNC). The EA is prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code 4321 et seq.), the President's Council on Environmental Quality Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations 1500-1508), VA's NEPA regulations (38 CFR 26), and the VA NEPA Interim Guidance for Projects (VA 2010). The attached EA is incorporated by reference into this Finding of No Significant Impact (FONSI).

BACKGROUND

The FSHNC is located within the city limits of San Antonio at 1520 Harry Wurzbach Road, adjacent to the Fort Sam Houston Joint Base San Antonio. The FSHNC was created by the United States Army in 1921. In 1931, it was designated a National Cemetery and formally named by Congressional Order Number 6 on August 4, 1937. The proposed area of potential effects includes approximately 43 acres across which there is planned construction of new roadways, parking lots, maintenance building, and stormwater treatment area, as well as several areas dedicated to various styles of burial plots. Of that, approximately 32 acres are currently unimproved, wooded areas that are generally adjacent to Salado Creek, which forms the boundary of the expansion to the east and south. The remaining approximately 18 acres are currently cleared and maintained on the periphery of the extant cemetery.

The purpose of the Proposed Action is to expand and improve the FSHNC in the east and west portions of the existing National Cemetery property, providing the capacity to sustain 15 additional years of interment. This EA has been prepared to supplement information that identified, analyzed, and documented the potential physical, environmental, cultural, and socioeconomic impacts associated with the proposed action and action alternative.

One of VA's established objectives defining outcomes for their burial programs is to ensure that interment needs of Veterans and eligible family members are met by providing Veterans with a dignified burial option within 75 miles of their home (NCA 2018-2022 Long Range Plan). VA established a 75-mile service area standard because NCA data show that more than 80 percent of persons interred in National Cemeteries resided within 75 miles of the cemetery at the time of death. The United States Census Bureau American Community Survey estimates that between 2013 and 2017, 151,560 veterans (7% of the current population) reside within Bexar County. The proposed cemetery expansion would provide additional capacity for Veterans and their families within the region.

SUMMARY OF PROPOSED ACTION

Based on current planning data, the proposed FSHNC expansion would be Phase 3 of a planned and anticipated build out to continue to provide interment services to local veterans and their families. This phase of development has been designed to avoid environmentally constrained areas (e.g., wetlands, waterways), where possible, which would be left undeveloped and remain as scenic locations at the Cemetery.

The Project encompasses approximately 43 acres. The Project would include 42,782 gravesites including casket and cremation sites in new burial sites and conversion of traditional burial areas to pre- placed crypt full casket sites. Additional improvements include repairs to existing columbaria, correct infrastructure deficiencies, extend the irrigation system, include the construction of an Honor Guard building (approximately 1,232 GSF) with adjacent parking, material storage building, three bay drive through equipment storage building, expanding the administration building, renovations of the maintenance building and the public information center, replace/add site furnishings, and construct necessary infrastructure (roadways, grading, drainage, irrigation, landscaping, signage, furnishings and equipment) for the newly developed portion of the cemetery. An access

road connecting the new City of San Antonio roadway to the north of the site will be added that runs west to east along the northeast boundary and turns south along the east boundary. The Project will develop VA-owned lands previously managed by the U.S. Army. Based on the anticipated design, expansion would provide all facilities necessary to maintain, operate, and provide interment sites for at least 15 years. In total, the project area would include approximately 42,782 interment options for Veterans and their families.

Summary of the No Action Alternative

A No Action alternative must also be analyzed to inform the public what actions would be taken and the effects of those actions should the Proposed Action not be implemented. Because the cemetery expansion area was acquired for the purpose of expanding the facilities, the only action alternatives to the Proposed Action would involve the same number and types of facilities as identified in the Master Plan or minor variations in the arrangement of the various facilities for each phase. The arrangements of various facilities would be similar and would result in the same impacts as the Proposed Action; therefore, variations of Phase 3 of the Master Plan were not analyzed.

SUMMARY OF ENVIRONMENTAL CONSEQUENCES

The Proposed Action is expected to result in long-term beneficial impacts to aesthetics, geology, topography and soils, hydrology and water quality, socioeconomics, community services, solid and hazardous waste, transportation and parking and utilities.

Progressing forward with the Proposed Action have potential for impacts to aesthetics, air quality, cultural resources, Geology, topography and soils, wildlife and habitat, noise, floodplains and wetlands, solid and hazardous waste, and transportation and parking. Attachment A lays out mitigation measures to be used to minimize and eliminate any adverse impacts that may have if the Proposed Action is chosen.

AGENCY AND PUBLIC COMMENT

The Notice of Availability for the Draft EA was published in the San Antonio Express newspaper on September 13 and 15, 2020 and letters mailed to stakeholders including federal, state, local governmental, organizations and tribes. The Draft EA was available on the Department of Veterans Affairs website (https://www.cfm.va.gov/environmental/index.asp) from September 7 through October 15, 2020. Public comments received from stakeholders were incorporated into the Final EA.

FINDING OF NO SIGNIFICANT IMPACT

This FONSI is based on the attached EA. The analysis performed in the EA concludes that there would be no adverse short-term, long-term or cumulative impacts to the human environment, provided best management practices and mitigation measures outlined in the Final EA, and included in Attachment A, are fully implemented. Therefore, this FONSI is appropriate and an Environmental Impact Statement is not required.

JEFFREY K. GRIMES 1784225

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Kash Grimes, Executive Director, NCA Continental District

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Attachment A. Mitigation Measures

Mitigation Measures

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.

Resource Area	Management and Minimization Measures
Aesthetics	• maintaining and adding trees, shrubs, and native grasses to the site perimeter to obstruct views of construction and to later incorporate it into the cemetery design. • create and routinely maintain landscaped areas, buildings, roadways and signage. • implement the construction related BMPs for dust control described Section 3.2. • As historical resources are located on site, utilizing historical visual aesthetics described in Section 3.3 Cultural Resources and further defined in Section 106 consultation with the Texas SHPO will be required.
Air Quality	• Maintain engines and exhaust systems in good working order. • Reduce vehicle idle times in accordance with VA Directive 0637. • Comply with Texas Commission on Environmental Quality (TCEQ) air quality regulations. • Use appropriate dust suppression methods during demolition and construction activities. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspending earth-moving activities during high wind conditions. • Maintain an appropriate speed to minimize dust generated by vehicles and equipment on unpaved surfaces. • Cover haul trucks with tarps. • Stabilize disturbed areas through re-vegetation or mulching of the area that would be inactive for several weeks or longer and upon completion of site preparation. • Visually monitor all demolition and construction activities regularly, particularly during extended periods of dry weather, and implement dust control BMPs when appropriate. • Communicate dust reducing BMPs to personnel. • Address air quality issues as they arise. Utilize emission reduction measures laid out in the 2018-2020 City of San Antonio – Ozone Action Day Plan during high ozone days and encourage construction workers to utilize carpooling, public transportation and trip reduction to the best extent possible.
Cultural Resources	• Project construction activities would adhere to all federal cultural preservation regulations as well as stipulations in the 2009 PA, 2014 MOA, and 2017 amendments. • In the event human remains or other cultural items are found, as defined by the Native American Graves Protection and Repatriation Act (NAGPRA) were found during construction or operation of the national cemetery, work would be halted in the area and the

	appropriate authorities would be contacted. • The design of the Honor Guard Building will follow the mitigation and design standards laid out in SHPO consultation and prior PAs and MOAs. • VA would secure any required, individual minor air emissions permits from the TCEQ, as appropriate, and based on the final design and prior to construction and operation of the proposed expansion area.
Geology, Topography, and soils	• The construction contractor would develop a stormwater pollution prevention plan and obtain NPDES Construction General Permit coverage from TCEQ for the Proposed Action. • The construction contractor would implement the NPDES permit to protect surface water quality. • Design paved areas to drain to the stormwater management system; • Install and maintain BMPs, such as silt fences and water breaks, stormwater detention basins, filter fences, sediment berms, interceptor ditches, straw bales, riprap, or other sediment control structures. • Re-spread stockpiled topsoil. • Seed/re-vegetate areas temporarily cleared of vegetation. • Retain onsite vegetation to the maximum extent possible. • Plant and maintain soil-stabilizing vegetation on disturbed areas. • Use native vegetation to re-vegetate disturbed soils.
Hydrology and Water Quality	• Project would implement all pertinent Federal, state, and local regulatory requirements and use environmentally sensitive site design, stormwater pollution prevention controls, good engineering practices, and construction best management practices. • Implement appropriate groundwater engineering controls should groundwater be encountered during construction. • Implement stormwater management facilities designed to retain excess stormwater runoff. • A SWPPP will be incorporated in the plan set
Wildlife and Habitat	• Construction would be timed to avoid nesting periods of migratory birds on the site and protected under the Migratory Bird Treaty Act. This Act prohibits the taking of migratory birds, their nests, and eggs. • Native species would be used to the greatest extent practicable when re-vegetating land disturbed by construction to avoid the potential introduction of non-native or invasive species and reduce water use. • Pollinator-friendly native species would be used to the greatest extent practicable in landscaping selections. • Should construction clearing and grading be unavoidable during the migratory bird nesting season (April to mid-July), a qualified biologist would verify the absence of biological resources. • The VA will apply for a COSA Tree Preservation Permit prior to construction activities.
Noise	• These measures would be briefed to the contractor at the construction kick-off meeting, and daily at tailgate safety meetings. The onsite construction manager would be responsible for addressing any noise issues that may arise. • Abide by VA project requirements that limits hours of the day in which construction equipment can be used. • Coordinate proposed construction activities in advance with adjacent sensitive receptors. Let the residents know what operations would be occurring at what times, including when they would start and when they

	would finish each day. Post signage, updated daily, at the entry points of the site providing current construction information, including schedule and activity. • Limit, to the extent possible, construction and associated heavy truck traffic to occur between 6:00 a.m. to 10 p.m. Sunday through Thursday and 6:00 a.m. to 11:00 p.m. Friday and Saturday according to COSA Code of Ordinances Article III-Noise. This measure would reduce noise effects during sensitive night-time hours. • Ensure construction personnel abide by Occupational Health and Safety Administration noise protection requirements. • Select material transportation routes as far away from sensitive receptors as possible. • Shut down noise-generating heavy equipment when it is not needed. • Maintain noisy equipment per manufacturer's recommendations. • Encourage construction personnel to operate equipment in the quietest manner practicable (such as, speed restrictions, retarder brake restrictions, and engine speedrestrictions). • Implementation of these BMPs would reduce the potential for short-term adverse noise effects to acceptable levels, notably for nearby sensitive receptors.
Land Use	• None.
Floodplains and Wetlands	• Construction activities would comply with applicable permit(s) from the USACE and State agencies. Additionally, construction activities would comply, to the extent possible, with local agencies' requirements, to minimize adverse effects to wetlands/Waters of the U.S. General construction practice BMPs would also be implemented to prevent any potential hydraulic oil spills. • Inspect and maintain construction vehicles in good working order and maintain a spill kit. Implement stormwater BMPs. • Based on the burial layout, the flood plain modification does not require any additional cutting as the water surface elevation remains unaffected.
Socioeconomics	• None.
Community Services	• If the proposed action is utilized, roadways will be designed to allow proper emergency vehicle access and follow safety requirements.
Solid Waste and Hazardous Materials	• Management of adverse effects, including releases, would be addressed immediately through implementation of a Site Safety Spill Prevention Plan that would have been developed before construction commenced. No significant long-term effects would result from solid waste or hazardous materials. • Any hazardous materials that were necessary during construction would be stored in an area designated for such materials. Other fuels and liquids related to cemetery maintenance and located in the maintenance building would be stored appropriately in a locked cabinet. Additionally, proper housekeeping practices and proper disposal of solid waste and hazardous materials would be adhered to during construction and operation of the cemetery. • During construction, minimization/management measures would result in less-than-significant short- term impacts to solid waste and hazardous materials. During operation, minimization/management measures would result in less-than-significant long-term impacts during operation to solid waste and hazardous materials.

	• If the buried waste is encountered during construction activities, it will be excavated or otherwise removed from the ground as part of renovation or construction activities, the generated waste and impacted soils would be properly managed and disposed offsite at appropriate landfill facility. VA will develop a Phase 3 Waste Response Action Work Plan that will describe the procedures to be followed including, but not limited to: • Separating the RMW from the other waste streams; • Conducting a hazardous waste determination on waste found in a container, where the residue has not been removed and the container has not been rendered useless; • Managing the waste from Areas 1 and 3 as Class 2 non-hazardous waste; and • Managing the waste from Area 2 as Class 1 non-hazardous waste. Alternatively, additional samples from Area 2 may be analyzed for TCLP acrylamide to make a Class II demonstration in coordination with the landfill.
Transportation and Parking	• Construction is anticipated to temporarily increase traffic of vehicles and impacts to utilities along roadways. • VA plans to use a contractor specific route as part of a COSA project that will limit traffic on the main streets around the VA project area specifically but not limited to Harry Wurzbach Avenue. • City road construction will be complete prior to the proposed action timeframe if the proposed action is chosen.
Utilities	• Coordination is underway with the City of San Antonio to ensure proposed expansion utility elements do not exceed capacity provided to the site.
Environmental Justice	• During construction, effects on adjacent land uses, such as through noise and dust, would be limited and controlled, thereby minimizing adverse effects to local populations. • Additionally, construction of the Proposed Action represents an anticipated short-term positive socioeconomic impact to local employment and personal income.
Cumulative Impacts	• None.