FINDING OF NO SIGNIFICANT IMPACT (FONSI)
DEPARTMENT OF VETERANS AFFAIRS
PROPOSED LAND ACQUISITION FOR THE EXPANSION OF THE
FORT LOGAN NATIONAL CEMETERY
DENVER, COLORADO

Introduction

A Final Environmental Assessment (EA), included herein by reference, was prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Department of Veterans Affairs' (VA's) Proposed Action to acquire approximately 49.4 acres of land (Site) located adjacent to the southeast of Fort Logan National Cemetery (FLNC) in the City and County of Denver, Colorado for the future expansion of the cemetery. The EA 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] 1500-1508), and VA's NEPA-implementing regulations (38 CFR Part 26).

VA intends to acquire the Site, currently owned by the State of Colorado, in 2019 and hold it until such date when the expansion of the FLNC becomes necessary in approximately five years. At that time, and as part of the cemetery design process, VA will perform a supplemental NEPA analysis to reanalyze and reevaluate the potential effects of the construction and operation of the expanded cemetery at the Site. VA will incorporate the avoidance, management, and minimization measures identified in this EA into that future design process and supplemental NEPA analysis to minimize potential adverse environmental effects.

The purpose of the Proposed Action is to expand the FLNC to provide a National Cemetery of sufficient size and capacity to serve the projected interment needs of Veterans in the Denver, Colorado region for up to 50 years after the current FLNC burial space is depleted.

A larger, expanded FLNC is needed to continue providing National Cemetery burial benefits to the regional Veteran community. VA estimates space remaining for burials at the FLNC will be fully depleted in approximately ten years. The nearest National Cemetery to FLNC that is accepting new burials is Pikes Peak National Cemetery, located more than 60 miles from FLNC in Colorado Springs, Colorado.

1. Description of the Proposed Action and Alternatives

Proposed Action

VA's Proposed Action is to acquire land adjacent to the existing FLNC for the future expansion of the cemetery. The future FLNC expansion would provide VA additional capacity to continue providing National Cemetery burial benefits to the regional Veteran community.

VA estimates the existing FLNC land contains adequate space for burials for approximately ten years. VA would acquire the Site in 2019 and would hold it until such a date that expansion of
the FLNC is necessary. It is anticipated that the expanded cemetery design and initial development would begin in approximately five years.

Design details of the proposed FLNC expansion do not exist at this time; however, future gravesite expansion onto the Site would be designed to be similar in appearance to the existing cemetery grounds of the adjacent FLNC.

**Alternatives Considered**

VA considers adjacent/contiguous property to be the first and best option for cemetery expansion as it is the most cost effective and operationally efficient and reduces way finding confusion for visitors. Approximately 49.4 acres of land adjacent to the southeast of the FLNC has been offered to VA by the State of Colorado for the cemetery expansion, as this land is mostly unutilized. VA reviewed the other land adjacent to and surrounding FLNC and found that the State-offered land was the only remaining potentially feasible adjacent land available for future cemetery expansion.

The EA examined in-depth two alternatives, the Proposed Action Alternative and the No Action Alternative, defined as follows:

- **Proposed Action Alternative:** VA would acquire approximately 49.4 acres of land adjacent to southeast of the FLNC that is owned by the State of Colorado and associated with the Colorado Mental Health Institute at Fort Logan (CMHIFL), for future expansion of the FLNC. The Site is mostly vacant grassy land with scattered trees. Four small buildings, several former building foundations, and roads remain at the Site. The Site would remain in its current configuration after VA's acquisition; however, CMHIFL's current limited on-site operations (storage, landscape equipment storage, and maintenance activities) would cease. It is anticipated that the cemetery design and initial development would begin in approximately five years. The majority of the Site would be developed (in phases) with the expanded cemetery.

- **No Action Alternative:** Under the No Action Alternative, the Proposed Action would not be implemented. Veterans and their families residing in the regional Denver area would continue to use the FLNC until space is no longer available. In the future, VA would likely seek other land to expand or replace FLNC, but may not be able to acquire land contiguous with or near the existing FLNC. The Site likely would remain mostly unused, State-owned land.

The Proposed Action effectively provides additional land necessary to meet the regional National Cemetery requirements of VA. The No Action Alternative would not enable VA to provide adequate cemetery facilities in the Denver region. However, the No Action Alternative was assessed in the EA to provide a comparative baseline analysis, as required under the CEQ regulations.
2. Environmental Analysis

Environmental Consequences

Proposed Action Alternative

Based on the analyses contained in the Final EA, the Proposed Action would result in potential adverse impacts to aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, wildlife and habitat, noise, land use, solid and hazardous materials, transportation, utilities, and environmental justice. These potential impacts are less than significant and would be further reduced through careful implementation of the general Best Management Practices (BMPs), management measures, and compliance with regulatory requirements as identified in the Final EA.

The FLNC and the approximately 49.4-acre Site were both formerly part of the 940-acre Fort Logan Military Reservation, which was established in 1887 to protect nascent Denver and was later home to a recruitment center, dirigible squadron, battalions of engineers, a supply camp for the Civilian Conservation Corps, and a large receiving station for newly enlisted personnel. The Fort closed in 1946, after World War II. In 1946, the Site and surrounding lands remained owned by the Federal government and were used by VA as a temporary health care facility for Veterans until the VA hospital in Denver was completed. In 1960, approximately 308 acres of the military reservation (including the Site) were transferred to the State of Colorado to construct a new mental health center (CMHIFL). The majority of the on-site buildings were razed over years. Two of the remaining Site buildings, Building 64 (Garage and Repair shop, constructed in 1939) and Building 180 (Combined Filling Station and Oil House, constructed in 1941), were determined to be contributing resources to the National Register of Historic Places (NRHP)-eligible CMHIFL National Register Historic District (NRHD).

VA’s acquisition of the Site would have no adverse effect on cultural resources. The future expansion of the FLNC at the Site would have adverse effects on historic properties as VA would demolish Buildings 64 and 180 to more fully use the Site as a cemetery. In May 2019, VA executed a Memorandum of Agreement (MOA) with the Colorado State Historic Preservation Office (SHPO) under Section 106 of the National Historic Preservation Act (NHPA) to mitigate the adverse effects of the demolition of Buildings 64 and 180. Historic Denver and the Sheridan Historical Society signed the MOA as concurring parties. The Advisory Council on Historic Preservation (ACHP) chose not to participate. NHPA mitigation measures agreed upon in the MOA include historic resource documentation of Buildings 64 and 180 prior to demolition for inclusion in SHPO’s files as well as the Sheridan Historical Society’s and Fort Logan Field Officer’s Museum’s archives. Per the MOA, VA will continue consultation with the Sheridan Historical Society and other consulting parties when the design phase of the FLNC expansion begins to avoid and/or minimize additional adverse impacts to historic properties. With the completion of the NHPA mitigation measures agreed upon in the MOA, cultural resources impacts would be less than significant.

The Proposed Action Alternative provides VA additional capacity to continue to provide National Cemetery burial benefits to the regional Veteran community, contiguous with the existing FLNC, a significant beneficial socioeconomic effect.
No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented. Veterans and their families residing in the regional Denver area would continue to use the FLNC until space is no longer available. In the future, VA would likely seek other land to expand or replace FLNC, but may not be able to acquire land contiguous with or near the existing FLNC. The Site likely would remain mostly unused, State-owned land.

Cumulative Impacts

The EA also examined the potential cumulative effects of implementing each of the considered alternatives. This analysis finds that the Proposed Action Alternative, with the implementation of the management and minimization measures specified in the EA, would not result in significant adverse cumulative impacts to onsite or regional natural or cultural resources, and would maintain the socioeconomic environment of the area through long-term provision of required cemetery facilities for regional Veterans. The No Action Alternative would not produce these potential positive socioeconomic gains.

Management and Minimization Measures

VA's acquisition of the Site would not affect cultural resources. However, the future expansion of the FLNC at the Site would have adverse effects on historic properties as VA would demolish Buildings 64 and 180, contributing resources to the CMH/IFL NRHD. VA executed an MOA with the SHPO under Section 106 of the NHPA to mitigate the adverse effects of the demolition of Buildings 64 and 180. With the completion of these NHPA mitigation measures, cultural resources impacts would be less than significant.

In addition, VA would implement the management and minimization measures summarized in the attached table (Appendix A) to minimize and maintain adverse effects at less-than-significant levels.

3. Regulations

The Proposed Action will not violate NEPA, the CEQ regulations, VA's NEPA regulations; or other federal, state, or local environmental regulations. This will be achieved by implementing the BMPs, management and minimization measures, and regulatory compliance measures described above and included in the attached table (Appendix A).

4. Commitment to Implementation

VA affirms its commitment to implement the BMPs, management measures, and minimization measures identified in the Final EA and this FONSI in accordance with NEPA, the CEQ regulations, and VA's NEPA regulations. Implementation is dependent on funding. VA will ensure that adequate funds are requested in future years' budget(s) to achieve the goals and objectives set forth in the Final EA and this FONSI, and to fund the commitments described above.
5. Agency and Public Involvement

VA has consulted with appropriate federal, state, and local regulatory agencies, and federally recognized Native American Tribes identified as having possible ancestral ties to the area. This consultation is documented in the Final EA. Concerns expressed by pertinent regulatory agencies and Tribes have been addressed in the Final EA.

VA published and distributed the Draft EA for a 30-day public comment period as announced by a Notice of Availability (NOA) published in the Denver Post from May 5 through 7, 2019. A copy of the Draft EA was also made available for public review at the Bear Valley Branch Library and on the VA National Cemetery Administration website (www.cem.va.gov/cpm/EA.asp). VA received no public comments regarding the Draft EA.

6. Finding of No Significant Impact

After careful review of the Final EA, VA has concluded that implementation of the Proposed Action would not have a significant impact on the quality of the human or natural environment, provided VA implements the BMPs, management and minimization measures, and regulatory compliance measures identified in the Final EA. VA will implement these measures. As part of the cemetery design process, VA will perform a supplemental NEPA analysis to reanalyze and reevaluate the potential effects of the construction and operation of the expanded cemetery at the Site. VA will incorporate the management and minimization measures identified in the Final EA into that future design process and supplemental NEPA analysis to minimize potential adverse environmental effects.

Therefore, per NEPA, the CEQ regulations, and VA’s NEPA regulations, I am signing this FONSI. This analysis fulfills the requirements of NEPA and the CEQ regulations. An environmental impact statement will not be prepared.

17 June 2019

Date

Mr. Michael T. Roth
Director, Design & Construction Service
National Cemetery Administration
Department of Veterans Affairs

13 Jun 19

Date

Mr. Rash Omnes
Director, NCA Continental District
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