FINDING OF NO SIGNIFICANT IMPACT (FONSI)
DEPARTMENT OF VETERANS AFFAIRS
PROPOSED LAND ACQUISITION FOR THE EXPANSION OF THE
JEFFERSON BARRACKS NATIONAL CEMETERY
ST. LOUIS COUNTY, MISSOURI

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 33.6 acres of land associated with the southern portion of Sylvan Springs County Park for the future expansion of the existing Jefferson Barracks National Cemetery (JBNC), located at 2900 Sheridan Road, in an unincorporated area of St. Louis County, Missouri. Preparation of the EA is required 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 38 CFR Part 26 (Environmental Effects of the Department of Veterans Affairs Actions).

VA intends to acquire the Site in 2018 and hold it until such date when the expansion of the JBNC becomes necessary. 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 management and minimization measures identified in this Final 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 JBNC to provide a National Cemetery of sufficient size and capacity to serve the projected interment needs of Veterans in the St. Louis, Missouri region for up to 20 years after the current JBNC burial space is depleted.

A larger, expanded JBNC is needed to address the projected depletion of remaining interment capacity at JBNC. JBNC is one of the five busiest National Cemeteries in the country and is the only National Cemetery in the region that is open to new interments; the nearest National Cemetery to JBNC that is accepting new burials is Camp Butler National Cemetery, located more than 115 miles from JBNC in Springfield, Illinois. The 355-acre JBNC is nearing its capacity for new burials. Based on the VA National Cemetery Administration's (NCA's) Gravesite Burial Statistics Analytical Tool (GBSAT), VA estimates approximately 10 years of remaining burial capacity on existing JBNC land before additional land is needed to be able to continue providing national shrine burial benefits to the regional Veteran community.

1. Description of the Proposed Action and Alternatives

Proposed Action

VA's Proposed Action is to acquire land adjacent to the existing JBNC for the future expansion of the cemetery. The future JBNC expansion would provide VA additional capacity to continue providing national shrine burial benefits to the regional Veterans community.
VA would acquire the Site in 2018. The Site would continue to be used as a park for up to 10 years after VA’s acquisition until such a time that expansion of the JBNC is necessary. It is anticipated that cemetery design and initial development would begin in approximately 4 to 7 years. Design details of the proposed JBNC expansion do not exist at this time; however, future grave site expansion on to the Site would be designed to be similar in appearance to the existing national shrine grounds of JBNC, located adjacent to the Site.

**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 33.6 acres of land adjacent to the north of the JBNC, associated with the southern portion of the approximately 70-acre Sylvan Springs Park, has been offered to VA by St. Louis County for the cemetery expansion, as this part of the park is currently underutilized. VA reviewed the remaining land adjacent to and surrounding JBNC and found that the County-offered park land was the only remaining potentially feasible adjacent land option available for future cemetery expansion.

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

- **Preferred Action Alternative**: VA would acquire approximately 33.6 acres of land adjacent to north of the JBNC that is associated with the southern portion of Sylvan Springs Park, for future expansion of the JBNC. Under an agreement with VA, St. Louis County would continue to operate the VA-acquired portion of the park (the Site) for up to 10 years, until VA has completed its design process and is preparing to start construction activities on the expanded JBNC. Upon closure of this portion of the park, VA would develop the Site as an expanded cemetery. The northern portion of Sylvan Springs Park, where the most prominent recreational facilities with the park are located, would not be acquired or altered by VA.

- **No Action Alternative**: Under the No Action Alternative, the Proposed Action would not be implemented. Veterans and their families residing in the regional St. Louis area would continue to use the JBNC until space is no longer available. In the future, VA would likely seek other land to expand the JBNC, but may not be able to acquire land contiguous with or near the existing JBNC. The Site likely would remain an underutilized County park.

The Preferred Action Alternative effectively provides additional land necessary to meet the regional cemetery requirements of VA. The No Action Alternative would not enable VA to provide adequate, cemetery facilities in the St. Louis 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

Preferred Action Alternative

Based on the analyses contained in the Final EA, the Preferred Action Alternative would result in potential adverse impacts to aesthetics, air quality, geology and soils, hydrology and water quality, wildlife and habitat, noise, land use, community services, solid and hazardous materials, transportation and parking, utilities, and environmental justice. These potential impacts are less-than-significant and would be further reduced through careful coordination and implementation of the general best management practices (BMPs), management and minimization measures, and compliance with regulatory requirements, as identified in the Final EA.

Two features at Sylvan Springs Park, the on-site 1952 Ordnance Shelter (pavilion and restrooms) and the northerly adjacent off-site 1939 Beverage Garden, were recommended for consideration for listing on the National Register of Historic Places (NRHP) as historic properties. VA’s proposed acquisition of the Site would have no effect on these historic properties. VA’s required National Historic Preservation Act (NHPA) Section 106 consultation with the Missouri State Historic Preservation Office (SHPO) for the Site acquisition is ongoing. During future cemetery development, VA would likely demolish the Ordnance Shelter to more fully utilize the Site as a cemetery. The cemetery development would have no direct effect on the Beverage Garden and is anticipated to have minor indirect (viewshed) effect on the Beverage Garden. During the design of the expanded cemetery, VA would complete the required Section 106 consultation with the SHPO for potential direct effects to the Ordnance Shelter and indirect effects on the Beverage Garden. VA would enter into a Memorandum of Agreement (MOA) under Section 106 of the NHPA with the SHPO and Advisory Council of Historic Preservation (ACHP) to mitigate the adverse effects under the NHPA.

The Preferred Action Alternative provides VA additional capacity to continue to provide national shrine burial benefits to the regional Veteran community, contiguous with the existing JBNC, 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 St. Louis area would continue to use the JBNC until space is no longer available. In the future, VA would likely seek other land to expand the JBNC, but may not be able to acquire land contiguous or near with the existing JBNC. The Site likely would remain an underutilized park.

Cumulative Impacts

The EA also examined the potential cumulative effects of implementing each of the considered alternatives. This analysis finds that the Preferred Action Alternative, with the implementation of the management and minimization measures specified in the Final 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 would enter into a MOA under Section 106 of the NHPA with the SHPO and ACHP to mitigate the direct adverse effects of the demolition of the Ordnance Shelter under the NHPA. VA would also consult with SHPO regarding the indirect effects on the off-site Beverage Garden and would include cemetery design measures to minimize these effects. With the completion of these NHPA-required measures, cultural resources impacts would be less-than-significant.

In addition, VA would implement the management measures 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 the NEPA, the CEQ Regulations, 38 CFR Part 26, 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 the NEPA, the CEQ Regulations, and 38 CFR Part 26. 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 St. Louis County, Missouri 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 St. Louis Post-Dispatch, a local newspaper of general circulation, on August 26, 27 and 29, 2018. A copy of the Draft EA was made available for public review at a local St. Louis County Public Library and on the NCA NEPA website (www.cem.va.gov/cem/EA.asp). In addition, VA held a public meeting at the Jefferson Barracks VA Medical Center on September 5, 2018 to discuss the Proposed Action and the Draft EA and to receive public comments on the Draft EA. Three members of the public attended the public meeting. Public comments were incorporated into the Final EA.

6. Finding of No Significant Impact

After careful review of the Final EA, VA has concluded that implementation of the Preferred Action Alternative 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 avoidance, management, and minimization measures identified in this Final EA into that future design process and supplemental NEPA analysis to minimize potential adverse environmental effects.

Therefore, per the NEPA, the CEQ Regulations, and 38 CFR Part 26, I am signing this FONSI. This analysis fulfills the requirements of the NEPA and the CEQ Regulations. An Environmental Impact Statement will not be prepared.

Date 11/19/18
Glenn Elliott
Environmental Engineer
Office of Construction and Facilities Management
Department of Veterans Affairs

Date 10/19/18
Mr. Joshua de Leon
Director, NCA Midwest District
National Cemetery Administration
Department of Veterans Affairs