

FINDING OF NO SIGNIFICANT IMPACT (FONSI):  
U.S. DEPARTMENT OF VETERANS AFFAIRS  
NEW MASTER PLAN AND GRAVESITE EXPANSION PROJECT,  
NATIONAL MEMORIAL CEMETERY OF ARIZONA,  
PHOENIX, ARIZONA

**Introduction**

The U.S. Department of Veterans Affairs (VA) National Cemetery Administration (NCA) prepared an Environmental Assessment (EA) of the potential physical, environmental, cultural, and socioeconomic impacts associated with implementation of the new Master Plan at the National Memorial Cemetery of Arizona (NMCA), Phoenix, Arizona. This proposed project would cover approximately 104 acres within the boundary of the NMCA and provide for 60 to 100 years of burial operations including casket, columbarium, and in-ground cremation sites; and provide an Honor Guard Lounge, restrooms, parking, irrigation, visitor amenities, signage, and operational facility improvements. The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 United States Code 4321 et seq.), the White House Council on Environmental Quality's "Regulations Implementing the Procedural Provisions of NEPA" (40 Code of Federal Regulations [CFR] 1500-1508), VA's NEPA regulations titled "Environmental Effects of the Department of Veterans Affairs Actions" (38 CFR Part 26), and VA's NEPA Interim Guidance for Projects.

The **purpose** of the Proposed Action is to expand and improve the existing national cemetery within the land acquired for this purpose to continue to meet the burial needs of veterans in the Phoenix area.

The Proposed Action is **needed** to meet the NCA goal of providing reasonable access to burial options for veterans. NCA defines reasonable access to burial benefits as follows: "a first interment option, for casketed or cremated remains in national or state Veteran's cemetery, is available within 75 miles of the Veterans' home" (VA, 2015). According to the United States Census Bureau, "in 2013, approximately 78,300 Veterans reside in Phoenix and 522,000 in the state of Arizona" (U.S. Census Bureau). This figure is significantly higher in comparison to other U.S. cities and states. Since NMCA's available burial space is declining, while the demand for reasonable burial options for

Veterans in Phoenix is expected to continue to rise, expansion and improvement of the existing cemetery are appropriate and necessary to accommodate future burials. Furthermore, for the Veterans living in Phoenix, NMCA is the only national cemetery available within a reasonable distance. The next nearest national cemetery is the Prescott National Cemetery, in Prescott, Arizona, approximately 85 miles to the northwest. The Proposed Action is needed to meet the NCA goal of providing reasonable access to VA burial options for veterans in the Phoenix area.

### **Background**

NCA is responsible for providing cemetery services for veterans and other eligible persons pursuant to the provisions of the National Cemeteries Act of 1973 and other statutory authority and regulations. Under this mandate, NCA is responsible for the operation and maintenance of existing national cemeteries and the construction of new national cemeteries. NMCA in Phoenix, Arizona was established as a state veteran's cemetery in 1979. NMCA was transferred to the VA in 1989 and became a national cemetery, run by the NCA. The cemetery property is located within the Phoenix city limits and occupies approximately 225 acres, of which 121 acres are developed and includes more than 56,000 gravesites. The remaining 104 acres on the east side of the site are undeveloped for future expansion on a need basis. NMCA ranks 14<sup>th</sup> in interment workload of VA national cemeteries. In fiscal year 2014 they conducted nearly 3,400 interments, two-thirds (2,253) were cremains. A burial rate consistency at this level will exhaust all available burial sites in the existing 121 developed acres of the cemetery in next several years. Based on this burial rate, the depletion dates for available burial sites are projected as follows: columbarium niches in August 2018, crypt sites in April 2019, and in-ground cremains sites in June 2020. Therefore, expansion and improving the existing cemetery is essential to continue to meet the burial needs of veterans in the Phoenix area.

### **Proposed Action**

VA's Proposed Action, is to implement the expansion by developing, operating and maintaining the undeveloped 104 acres adjacent to and east of the existing cemetery site and implement the improvements to the existing cemetery facilities identified in the Master Plan (see Exhibit 2.1 in EA). As part of the master planning process VA evaluated the physical, operational, and site-specific requirements of the Proposed

Action, as well as costs, environmental issues, and other factors. The Proposed Action would provide approximately 185,760 additional interment sites for NMCA, consisting of approximately 43,930 preplaced casket crypts, 1,320 casket interments (direct bury traditional), 94,400 columbarium niches, and 46,110 in-ground cremains. Per the Master Plan, buildout of the expansion area is anticipated to occur over approximately nine phases, subject to the availability of funding. The number and type of interment sites in each phase are outlined in Table 2.1 of the EA: Interments by Phase, below. Services would continue to take place at five existing committal service shelters on the existing site. Up to 30 ceremonies would occur on Mondays and Fridays and about 5 to 10 services per day on Tuesdays, Wednesdays, and Thursdays between the hours of 9:00 am and 3:00 pm, with occasional services on the weekends. There would be no new service shelters, where ceremonies would be conducted in the expansion area.

**Table 2.1: Interments by Phase**

Phase	Direct Bury Traditional		Pre-Placed Crypts		In-Ground Cremains		Columbarium Niches		Total Interments		Approx. Expiration Date
	Proposed	Projected	Proposed	Projected	Proposed	Projected	Proposed	Projected	Proposed	Projected	
1A	0	0	2,260	2,160	1,910	1,144	2,760	4,600	6,930	7,904	2022
1B	0	N/A	0	N/A	0	N/A	1,840	N/A	1,840	N/A	2022
2	0	0	6,550	6,254	6,770	6,668	15,000	15,261	28,320	28,183	2032
3	220	220	5,820	5,821	6,930	6,570	15,000	15,460	27,970	28,071	2042
4	220	220	5,410	5,100	6,520	5,761	12,700	13,547	24,850	24,628	2052
5	220	220	5,850	5,090	5,590	5,750	15,100	13,520	26,760	24,580	2062
6	220	220	5,120	5,090	6,500	5,750	14,000	13,520	25,840	24,580	2072
7	220	220	5,100	5,090	5,500	5,750	13,900	13,520	24,720	24,580	2082
8	220	220	7,820	5,090	6,390	5,750	4,100	13,520	18,530	24,580	2092
<b>Total</b>	<b>1,320</b>	<b>1,320</b>	<b>43,930</b>	<b>39,695</b>	<b>46,110</b>	<b>43,143</b>	<b>94,400</b>	<b>102,948</b>	<b>185,760</b>	<b>187,106</b>	

The number of “proposed” interments in Table 2.1 above are those that will be constructed as part of the Master Plan. The number of “projected” interments are those that are projected to be needed based on current and historic demands for each type. The approximate expiration dates represent the year in which the total interment sites would be expected to deplete based on current exhaustion rates. These are estimated dates and are subject to change based on any changes in trends of demand for different types of interments.

The Proposed Action would include construction of access roads, site drainage, utilities, signage, site furnishings, fencing, landscaping, and irrigation consistent with the existing cemetery (Exhibit 2.1 of EA). The Proposed Action includes renovation and

expansion of the existing Administration Building, improvements to the existing Maintenance Complex, and improvements to the existing drainage channels and basins.

**Construction Schedule and Duration:**

Buildout of the 104-acre expansion area will not occur at one time, rather it would develop in multiple phases. Nine (9) phases are anticipated. Each phase could be eight to ten years apart. Total duration to complete the proposed buildout could be 60 to 100 years. Each phase can vary in overall size but is anticipated to include an area of up to a maximum of 35 acres. The first phase is anticipated to start in 2016 to 2018. Due to funding, mechanical or weather constraints, construction may be delayed to later years. Duration of each phase of construction is anticipated to take approximately 12 to 24 months. Hours of construction will typically be 8:00 am to 4:30 pm, Monday through Friday, excluding federal holidays. Upon request from the contractor, VA will consider other hours (within local restrictions). Earlier start times are more commonly requested during hot-weather months. Occasional exceptions to work on Saturday, Sunday and certain federal holidays will be considered on a case-by-case basis.

**Equipment and Material:**

The expansion area improvements are designed to balance all cut and fill from earthwork (grading, excavation of burial sites, and trenching). Earthwork for the entire 104-acre expansion area would involve approximately 90 to 100 cubic yards of balanced cut and fill. Therefore, an offsite location for source of fill or disposal for excess fill, and associated offsite truck trips is not required. The types of construction equipment anticipated to be used for each phase of construction include: 4 graders, 2 scrapers, 1 tractor, 1 loader, 1 backhoe, 1 excavator. The anticipated number of construction workers for each phase could range from 20 to 30. Staging areas for future phases of Master Plan development would occur adjacent to the current phase of developed, generally west and in undeveloped portions of the expansion area. Staging areas would be used for staging equipment and supplies and stockpiling of excavated soils. Portions of the expansion area are currently used by cemetery staff for stockpiling green waste (landscape cuttings and flowers), soils, and excess cemetery materials.

Access Roads

Existing roadways would be prioritized for repair and re-sealing, and would be extended into the 104 undeveloped acres to provide vehicular and pedestrian access to

new interment sites. The accessible two-lane asphalt roads would be wide enough for parallel parking at burial sections. Parallel parking pull-offs would be provided at new buildings and columbaria. An additional gated entrance would be provided off North Black Mountain Parkway approximately 1,000 feet south of the intersection of Pinnacle Peak Road and North Black Mountain Parkway.

### Utilities

As identified in the Master Plan, existing utilities, which include electric and phone would be extended for the development of the 104 acres. Electricity provided by Arizona Public Services and telecommunications provided by Century Link enter the site from the west via National Memorial Cemetery Road. There is an existing well with a 40,000-gallon potable water tank with three 90 GPM (gallon per minute) electric motor driven water pumps located on the northeast corner of the property that currently supports the existing cemetery. From the water tank, a 6-inch main line runs across the expansion area site to the intersection of Silver Star Way and Legion of Honor Road, then increases in size to a 12-inch line. The 12-inch water main line runs on the north side of Silver Star Way and distributes to all of the existing site amenities including the Administration Building, the Maintenance Yard and the restroom off of Legion of Honor Way. An onsite propane tank is used for the Eternal Flame Monument.

### Signage

Sign panels throughout the cemetery would be replaced as and where needed. With implementation of the Master Plan, some revisions to existing signs are necessary. New signage would be included throughout the proposed expansion area for directional support for visitors of the 104-acre development.

### Site Furnishings

New site furnishings, consistent with those existing at NMCA, would be located throughout the 104 acres to support the new development. The furnishings would include benches, trash receptacles, flower vase receptacles, and water spigots.

### Fencing

Perimeter fencing along Pinnacle Peak Road and N. Black Mountain Parkway will be ornamental with masonry columns matching the existing fencing. The perimeter fencing along the south property line will be consistent with the chain link fencing that is present at the existing cemetery. Automated gates will be provided at the existing main cemetery entrance on Pinnacle Peak Road as well as an additional entrance off of North Black Mountain Parkway.

### Irrigation

New micro irrigation circuits would be provided as necessary to new planting areas that must provide sufficient water to promote healthy plant life. The irrigation water used would be provided by an onsite well.

### Renovation and Expansion of Administration Building

A renovation and expansion for the existing Administration Building would be completed to meet operational and space requirements. The building expansion would address the space deficiencies in the existing Administration Building with respect to having a cemetery with a full administrative staff of seven individuals to support an average of fourteen interments per day. VA identified roof leaks, interior finishes for floors, walls and ceilings, casework, and other finishes or improvements that are needed to bring the structure within current codes, NCA operational standards, and VA or Federal mandates for sustainability and energy and water consumption.

### Maintenance Complex Improvements

Improvements would be made to the existing Maintenance Complex to address square foot requirements and space deficiencies by functional area. The expansion and renovation would consist with the following: adding office space, cantilevered roof structure over the above-ground fuel storage tanks, replacing the pre-engineered metal buildings and bringing structure(s) in compliance with current codes and VA or Federal mandates for sustainability, energy, and water consumption. The improvements also address environmental regulatory requirements by plugging a drain in the Maintenance Complex to prevent discharge into drainage channels and provide an oil and water separator for the wash bay.

### Honor Guard Building

An approximately 1,000 square-foot Honor Guard Building would be constructed as a free-standing structure in the expansion area, just east of the developed cemetery site near the southern boundary. The primary function of the Honor Guard Building is to provide a place for the Honor Guard to assemble, prepare for the day's duties, relax between ceremonies and obtain nourishment and refreshments. The Honor Guard Building will contain Women's and Men's restrooms, locker area, gun storage, kitchenette and dining/snack area and a sheltered exterior rest area. The proposed form of the building is based on the existing Administration Building and the southwestern United States style. By providing building materials and a style similar to the existing Administration Building, the Honor Guard Building would look like a staff building rather than the more publically used facilities within the cemetery.

### Vehicle Barriers, parking and Roads

Vehicle standoff distances would be set to 25 feet for the Honor Guard Building. Automated gates would be provided at the existing main cemetery entrance and ornamental swing gates with a pad lock at the new maintenance access. New road design, widths and pull-off parking spaces would follow the NCA design guide standards. The Honor Guard Building would be supported with seven parking spaces; one stall would be designated for van accessible Americans with Disabilities Act (ADA) use.

### **Future Operation and Maintenance (O&M)**

Operations and maintenance (O&M) would be included as part of the Proposed Action and would consist of similar activities as those currently conducted for the existing developed cemetery. Maintenance activities include trimming and replanting of trees, shrubs, or cacti as needed, trash and debris removal, cleaning and repainting of buildings and structures/amenities as needed, irrigation repair, cleaning and repair of storm drain basins, channels, and maintenance oil water separator and septic tanks, as well as maintenance of roads, parking and fencing. Each national cemetery is managed by VA NCA personnel in conformance with national and regional policies, priorities, goals, and objectives. Typical operation activities include burial or inurnment of veterans and eligible family members and the placement and maintenance of a grave marker or niche cover. Cemetery operations include conducting Memorial Day and other special ceremonies, as well as the care of the graves, structures and grounds.

Operating hours for the cemetery are Monday through Friday, 8:00 am – 4:30 pm. Currently there are approximately 30 employees at NMCA.

### **Alternatives**

In addition to the Proposed Action described above, VA evaluated a No Action Alternative. The No Action alternative serves as a benchmark against which the effects of the Proposed Action can be evaluated. For this project, No Action is defined as not expanding and improving the National Memorial Cemetery of Arizona, but continuing burial operations until the existing cemetery reaches capacity with continuing site maintenance activities thereafter.

The No Action Alternative would challenge NCA goal of providing eligible veterans with reasonable access to VA burial options in the Phoenix area, and therefore, would not meet the purpose and need for the action. Veterans and their families residing in Phoenix, Arizona would be underserved in the future; which would require veterans and their families to travel further to the only other available national cemetery in Arizona, located approximately 85 miles northwest of Phoenix in Prescott. Prescott National Cemetery is open only for inurnment of cremated remains in the columbarium; no casket gravesites are available. The nearest state cemetery is Arizona Veterans Memorial Cemetery located in Marana, AZ, approximately 113 miles from Phoenix. Under the No Action Alternative, NCA's goal of providing reasonable access to burial benefits (within 75 miles of the veteran's home) for eligible veterans would not be met.

Furthermore, the No Action Alternative would create hardships for the survivors of deceased veterans to attend the funerals and for grave visitations because of the longer distances between homes and burial sites. Resorting to private burials would deprive veterans and their families of the honor and privilege bestowed upon them for their service to their grateful nation.

### **Environmental Analysis**

As documented in the EA, VA concludes no significant adverse impacts, either individually or cumulatively, would result from implementing the Proposed Action. The Proposed Action would have negligible effects on aesthetics, hydrology and water quality, noise, land use, floodplains, wetlands, and coastal zone management, solid and



hazardous materials, utilities and environmental justice. During construction and operation of the Proposed Action, less-than significant minor adverse effects would occur to air quality, cultural resources, geology and soils, wildlife and habitat and transportation. VA will implement the best management practices, monitoring opportunities, and regulatory compliance measures to maintain these effects at less-than-significant levels as described in the EA and summarized in the attached table (Appendix A). The Proposed Action would have less-than-significant beneficial long-term effects on socioeconomics (possible short-term employment during construction) and community services (providing burial services for veterans and their families). No significant cumulative adverse effects to any resources are anticipated. No potential for generating substantial controversy was identified.

### **Agency and Public Comment**


The NOA for the Draft EA release for public comments was published in the Phoenix New Times newspaper. The EA was posted at public libraries, local Post Office, City Offices, etc. on February 29, 2016. In addition, letters notifying the public, concerned resource agencies, and tribes listed in Section 4.1 of the availability of the DEA were mailed. The DEA appeared on the VA website on [March 8, 2016, therefore, the comment period ended on April 7, 2016](#). Two letters and two emails commenting on the DEA were received and considered in the Final EA (see Appendix F, *Comments on Draft Environmental Assessment*).

### **Minimization Measures**

The analysis of the Proposed Action did not identify any mitigation measures required to reduce potential impacts to less-than-significant, with the exception of the Sonoran desert tortoise and nesting bird pre-construction clearance surveys. In addition, NCA will implement the routine minimization measures and best management practices identified in the EA and summarized in the attached table (Appendix A).

### **Finding of No Significant Impact**

As a result of the analysis of impacts in the EA, summarized and incorporated by reference herein, it is the conclusion of VA that, with the implementation of appropriate best management practices and minimization technique, the Proposed Action would not generate significant public controversy nor have a significant adverse impact on the

  
Name Michael T. Roth Date 5/11/16  
Title Director, Design & Construction Service

\_\_\_\_\_  
Name \_\_\_\_\_ Date \_\_\_\_\_  
Title \_\_\_\_\_

**Attachment A. Best Management Practices and Minimization Techniques  
Incorporated into the Proposed Action**

<b>Technical Resource Area</b>	<b>Best Management Practice/Minimization Measure</b>
Air Quality	<p>Fugitive dust associated with construction could be minimized by using appropriate dust control measures such as applying water, dust palliative, soil stabilizers, enclosures, covers, and silt fences on disturbed areas as soon as possible. In addition, suspending earth-moving activities during periods of high wind and having vehicles and equipment moving across unpaved surfaces maintain an appropriate speed, can minimize the amount of ambient dust that is generated. Upon completion of construction activities re-vegetate, hardscape, or apply other appropriate soil stabilizer as soon as possible.</p>
Cultural Resources	<p>If previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist shall be contacted to assess the nature and significance of the find, diverting construction excavation if necessary.</p> <p>If human remains are encountered during the undertaking, the County Coroner shall be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of VA, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.</p>
Geology and Soils	<p>Potential impacts to new NMCA facilities could be minimized through over-excavation and re-compaction of sufficient thickness below foundations and slabs as determined by a qualified geologist or soils engineer.</p>

<p>Water Resources</p>	<p>No work would be performed during a rain or storm event. No pollutant would be discharged directly in the Waters of the U.S. The Construction Contractor would prepare SWPPP prior to implementation of the construction to identify erosion control devises and applicable best management practices to avoid impacts to the Waters of the U.S.</p>
<p>Wildlife and Habitat</p>	<p><u>Arizona Native Plant Law</u>  All categories of ADA-listed plants shall acquire a permit from the ADA,   Prior to each phase of development in the expansion area, applicable permits will be obtained for ADA-listed plants that must be removed and cannot be preserved and incorporated into the site design.</p> <p><u>Sonoran Desert Tortoise</u>  Although Sonoran desert tortoise is not anticipated to be found on site, in order to ensure that future construction activities do not directly impact this sensitive species, a 30-day pre-construction desert tortoise clearance survey shall be conducted by a qualified biologist prior to the construction start for each phase. If any tortoises are found, they will be relocated by a qualified biologist to another part of the expansion area or an offsite location as approved by Arizona Department of Game and Fish.</p> <p><u>Nesting Birds</u>  Pursuant to the Migratory Bird Treaty Act (MBTA) and Arizona Game and Fish Law, removal of any trees, shrubs, or any other potential nesting habitat should be conducted outside the avian nesting season to avoid impacts to nesting birds. The nesting season generally extends from early February through August, but can vary slightly from year to year based upon seasonal weather conditions and individual species, which may nest</p>

	<p>earlier or later depending largely on food availability. Some birds may nest later than this due to renewed vegetation and prey during the summer monsoon season. If ground disturbance and vegetation removal cannot occur outside of the nesting season, a preconstruction clearance survey for nesting birds should be conducted within three days of the start of any ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a 300-foot buffer around the active nest. For raptor species, this buffer is expanded to 500 feet. A biological monitor will be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, normal construction activities can proceed.</p> <p>Prior to start of construction on future phases a qualified biologist shall conduct a Worker Education and Awareness Program (WEAP) with the contractor and construction crew to identify daily avoidance and minimization activities that shall be implemented to minimize impacts to biological resources.</p> <p><u>Jurisdictional Areas</u></p> <p>Mitigation will include creation of jurisdictional areas and habitat within the drainage plan for the site or purchase of credits in a Mitigation Bank, an In Lieu Fee Program, or a combination of the three, as deemed appropriate by the USACE.</p>
<p>Transportation and</p>	<p>Short-term transportation impacts during construction activities</p>

Parking	shall be minimized through implementation of the following: <ul style="list-style-type: none"><li>• Schedule construction activities such that traffic increases do not coincide with typical morning and evening periods of increased traffic.</li><li>• Route transportation of construction equipment to minimize impacts on neighboring communities.</li></ul>
---------	--