

FINDING OF NO SIGNIFICANT IMPACT (FONSI) DEPARTMENT OF VETERANS AFFAIRS FOR EXPANSION AND IMPROVEMENTS AT THE WILLAMETTE NATIONAL CEMETERY PORTLAND, OREGON

Introduction

The U.S. Department of Veterans Affairs (VA) has prepared a Site-Specific Environmental Assessment (SEA) to identify, analyze, and document potential physical, environmental, cultural, and socioeconomic impacts associated with the expansion and improvements of Willamette National Cemetery. The SEA builds upon the *Environmental Assessment for the Planned Expansion of the Willamette National Cemetery, Portland, Oregon* (June 2010), which generally assessed the potential impacts of expanding the cemetery as part of a site acquisition process. After completion of the Environmental Assessment (EA), the VA acquired the 38.2-acre parcel in 2011 for expansion of the cemetery. This SEA more precisely analyzes the potential effects of constructing and operating the proposed cemetery expansion now that more detailed planning of the site has occurred.

The SEA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 United States Code [U.S.C.] 4321 et seq.), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500–1508), Environmental Effects of the Department of Veterans Affairs Actions (38 CFR Part 26), and the VA's NEPA Interim Guidance for Projects.

Purpose and Need

The purpose of the Proposed Action is to enable the VA to provide eligible Veterans and their families in the Portland metropolitan area with a National Cemetery of sufficient size and capacity to serve the projected needs in this region for 10 years.

The Proposed Action is needed to meet the National Cemetery Administration's goal of providing eligible Veterans with reasonable access to VA burial options. The National Cemetery Administration estimates that Willamette National Cemetery will have exhausted space for in-ground burials by 2019 and columbarium niche inurnments by 2021. Without acquiring land for future expansion, there would not be a readily accessible public veterans' national cemetery that can accommodate the future burial needs of the veteran population residing in the Portland metropolitan and regional area.

Proposed Action

This SEA evaluates the expansion of and improvements to the Willamette National Cemetery on approximately 16.7 acres of the 38.2-acre parcel acquired in 2011. The Proposed Action would entail a 10-year gravesite expansion on the new property, as well as gravesite expansion within the original cemetery, facility renovation, facility replacement, infrastructure upgrades, and various other new elements and features. The project would comprise 23,150 gravesites in the form of pre-placed crypts, columbarium niches, and in-ground cremains, as well as memorial walls, roadways, a stream crossing, utility systems, site furnishings, signage, landscaping, and irrigation. An early turnover phase consisting of approximately 1,200 pre-placed crypts would be constructed first to provide for immediate burial needs at the cemetery. Additional facility

improvements would include renovation of the existing administration building and replacement of existing employee maintenance building (3003) and demolition of the residential single family building (2001).

Alternatives Considered

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

- **Preferred Alternative:** Under the Preferred Alternative, the Proposed Action would be implemented. A 10-year gravesite expansion would be implemented within the original Willamette National Cemetery and on 16.7 acres of the expansion site, along with other improvements to the original cemetery.
- **No Action Alternative:** Under the No Action Alternative, the Proposed Action would not be implemented and Willamette National Cemetery would not be expanded or improved. Interments would continue until the capacity of the current cemetery is reached, and site maintenance activities would continue. Thereafter, Veterans and their families residing in the Portland metropolitan area would be underserved; in many cases, this would require many Veterans and their families to travel more than 75 miles to reach a National Cemetery in Oregon or Washington, or to use a private cemetery for burials. The distribution of National Cemeteries in the region would be unequal, and the VA would not be in compliance with the requirements of the Service members Civil Relief Act. While the No Action Alternative would not satisfy the purpose of or need for the Proposed Action, this alternative was retained to provide a comparative baseline against which to analyze the effects of the Proposed Action.

Potential Environmental Effects

The SEA evaluates the potential direct, indirect, and cumulative effects on the physical, environmental, cultural, and socioeconomic aspects of implementing the Proposed Action. The Preferred Alternative would result in no significant adverse direct, indirect, or cumulative effects on the following resource areas that were considered in detail in this SEA: aesthetics; air quality; cultural resources; geology, topography, and soils; hydrology and water quality; floodplains and wetlands; wildlife and habitat; noise; land use; transportation and parking; or utilities.

In addition, any potential adverse effects on these technical resource areas would be further reduced or avoided through the implementation of standard environmental best management practices (BMPs) or optional management measures as discussed in the SEA and summarized in the attached table (Attachment A). The potential environmental effects associated with implementing the Preferred Alternative are summarized in the following sections.

Aesthetics. Potential minor, short-term, adverse effects and minor, long-term, beneficial effects would be expected. The presence of construction equipment would affect the visual quality of the site; however, construction activities would be conducted with sensitivity for interment services, and impacts would be temporary and minor. In the long term, the Preferred Alternative would benefit aesthetics of the cemetery. The current design would develop the site in a manner that strives to preserve the natural landscape of the expansion site, with the use of native plants. Conservation easements maintained within the expansion site would also preserve the natural setting of the project site. Improvements within the original cemetery would also enhance the aesthetics and prevent deterioration of facilities.

Air Quality. Minor, short-term adverse impacts on air quality would be expected. Fugitive dust emissions could be generated during site preparation and construction activities, causing minor, localized, short-term impacts on air quality and creating temporary nuisance concerns to surrounding landowners. Once operational, the Preferred Alternative would likely increase the number of vehicles traveling to and from the cemetery for burials and visitation, causing negligible long-term impacts on air quality from emissions.

Cultural Resources. As a National Cemetery, Willamette National Cemetery is listed on the National Register of Historic Place (NRHP). The removal of two contributing resources to the original cemetery—Building 2001 and Building 3003—is considered an adverse effect on cultural resources. However, the demolition of these buildings would not diminish the NRHP status of the cemetery and, therefore, would not be a significant impact on cultural resources. The Oregon State Historic Preservation Office (SHPO) concurred with the determination of an adverse effect, and recommended mitigation measures. The VA plans to implement mitigation measures to offset the effects of the Proposed Action in the form of state-level documentation of the buildings. A Memorandum of Agreement to this effect will be submitted to the SHPO. No known cultural resource sites are located within the expansion area, and it is unlikely that any archaeological sites would be found. The Oregon SHPO confirmed that no eligible or listed historic or archaeological properties exist in the expansion area. The potential exists for disturbance of previously unknown archaeological resources during construction and excavation, but adherence to federal regulations would reduce any potential impacts. The VA consulted with Native American Tribes having possible interest in the project area; no Tribes responded to VA consultation requests. No direct or indirect impacts are expected on any historic properties outside of Willamette National Cemetery.

Geology, Topography, and Soils. Minor, short-term adverse impacts would be expected. In some areas, minor alterations to topography would be expected to prepare moderately sloped areas for gravesite development, road construction, and building construction. Otherwise, the expansion would be designed in concert with the site's natural topography. Minor, direct and indirect, short-term, adverse soil erosion and sedimentation impacts would be expected during new construction and improvements that require earthwork. These potential effects would be prevented through the utilization of appropriate BMPs and adherence to the terms of the Oregon Department of Environmental Quality discharge permit. No impacts on prime farmland soils would be expected. No adverse impacts on existing geologic features would be expected.

Hydrology and Water Quality. Minor, short-term, adverse impacts on surface waters could occur; no effects on groundwater would be expected. Impacts on surface water would primarily result from potential turbidity and sedimentation associated with stormwater runoff from construction activities and the removal of vegetation in the expansion site. These impacts would be minor and short term. The Preferred Alternative calls for development of gravesites and infrastructure outside of the forested areas on the site, which are protected by conservation easement. The two primary drainages on the site are protected within these conservation easements and buffered substantially by heavy vegetation and forested areas. Interments and associated infrastructure would not have significant impacts on these drainage streams, though site design would need to consider existing seeps and drainage pathways.

Floodplains and Wetlands. Minor, short-term and long-term, adverse impacts on wetlands would be expected from potential stormwater runoff, sedimentation, and disturbance of wetlands during construction of a wetlands-spanning crossing. Implementation of stormwater and erosion and sedimentation BMPs would ensure these effects are short term and minor. The proposed road crossing would traverse a perennial stream and some associated wetlands. Due to the extent of wetlands on the expansion site, it is unavoidable to construct a road through the site

without affecting a small area of wetlands. The VA has received concurrence on the boundaries of the mapped wetlands, pond, and tributaries on the site from the Oregon Department of State Lands regarding Oregon's Removal-Fill law, and the VA has obtained a Nationwide permit from the U.S. Army Corps of Engineers for the development of the crossing over the wetlands. The VA will obtain a 401 Water Quality Certification from the Oregon Department of Environmental Quality. The VA has proposed mitigation for the anticipated wetland impacts through a wetland mitigation bank. The crossing would affect less than 0.2 acres of wetlands, and the mitigation bank would reduce the temporal losses to the wetlands. No impacts on floodplains would be expected; the Preferred Alternative is not located within a 100- or 500-year flood zone.

Wildlife and Habitat. Minor, short-term, adverse impacts on wildlife and habitat would be expected. The proposed expansion would include development that is complementary to the area's existing natural features and designed in coordination with the natural topography, drainage, native species, and associated habitat. Potential displacement of common wildlife that may inhabit or use the site for nesting, foraging, or temporary cover may occur. If initial clearing were to occur during bird breeding season (typically April through July), there may be impacts on bird species protected under the Migratory Bird Treaty Act. Impacts could be minimized by following minimization and management measures as outlined in the SEA. There are no candidate, threatened, or endangered species on the site; however, steelhead trout and coho salmon, both federally threatened species, are present roughly one mile downstream from the project site in Johnson Creek, where critical habitat has been identified for both species. Soil erosion from proposed activities could affect these habitats; however, stormwater and erosion and sedimentation BMPs would minimize these impacts. The VA has consulted with the USFWS and the NMFS regarding these impacts.

Noise. Minor, short-term, adverse impacts on sensitive noise receptors would be expected. Construction activities associated with the Preferred Alternative would result in minor, short-term adverse impacts that would vary throughout the construction process. Peak noise exposure to adjacent receptors (i.e., private residences) would be intermittent throughout the construction cycle, creating temporary nuisance noise that would not be considered significant. In the long term, operations and routine maintenance would generate negligible noise in the context of current sources of noise in the area. Noise associated with rifle solutes would occur at a similar frequency and level to current memorial services at Willamette National Cemetery.

Transportation and Parking. Negligible, short-term and long-term, adverse impacts on transportation would be expected due to the construction of a new entrance on SE 132nd Avenue. Short-term increases in traffic would occur during site construction and the installation of new utilities on the site. In the long term, the rates of interments and special events are not expected to increase, and increases in traffic resulting from increased visitation to the cemetery would be negligible. Parking within the expanded cemetery would accommodate visitors to the expansion site. No impacts on parking would be expected.

Utilities. Potential impacts from expanding utility services to the expansion site would be negligible. Utility usage at the cemetery expansion site would be insignificant relative to regional and local utility usage and would not have adverse impacts on utility providers.

Cumulative Impacts. No significant cumulative adverse impacts on any resources are anticipated. The VA's adherence to BMPs during construction and operation would maintain any potential adverse impacts at less-than-significant levels. The operation of a National Cemetery is considered low-intensity, and no significant, adverse, cumulative impacts are anticipated from the improvements of Willamette National Cemetery.

Potential for Generating Substantial Public Controversy. The Preferred Alternative is not likely to cause controversy. No substantial public controversy regarding the Preferred Alternative was received during the public meeting and public comment period.

Agency and Public Comment

During the SEA process, the VA held a public meeting at the Multnomah Public Library Midland on February 21, 2018. There were no attendees at the meeting. The Draft SEA was also available for a 30-day public comment period, beginning February 21, 2018. Copies of the EA were available for public review on the VA website. No public comments were received during this period.

Consultation with agencies and Native American Tribes occurred concurrently with drafting the SEA, including coordination with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, the U.S. Department of Agriculture Natural Resources Conservation Service, Oregon Department of State Lands, Oregon SHPO, and three Native American Tribes.

Finding of No Significant Impact

As a result of the impacts analyses in the SEA, which is summarized and incorporated by reference herein, it is the conclusion of the VA that, with the implementation of appropriate minimization and avoidance measures included herein as Attachment A, the Preferred Alternative would not generate significant public controversy nor have a significant adverse impact on the quality of the natural or human environment within the meaning of Section 102(2c) of NEPA. Therefore, preparation of an Environmental Impact Statement is not required.

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Executive Director – Pacific District

6/13/2018

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Glenn Elliott
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Attachment A: Best Management Practices Incorporated into the Proposed Action

| Technical Resource Area | Best Management Practice/Environmental Protection Measure |
|-------------------------|--|
| Aesthetics | Incorporate existing topography and natural features into site design, wherever possible. |
| | Maintain landscaped areas, buildings, roadways, and signage. |
| | Design the site to accentuate existing viewsheds. |
| | Conduct construction activities with a sensitivity toward maintaining the dignity and solemnity of the National Cemetery environment during interment services. |
| Air Quality | Use appropriate dust-suppression methods during on-site construction activities. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspension of 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 previously disturbed areas through revegetation or mulching if the area would be inactive for several weeks or longer. |
| | Develop a spoils management plan. This will entail stabilizing existing spoils storage areas through excavation, compaction, and stabilization measures. |
| Cultural Resources | Adhere to federal and state regulations during the development process. The VA will implement mitigation measures to offset the effects of the Proposed Action in the form of state-level documentation of Buildings 2001 and 3003. |
| | Should human remains or other cultural items, as defined by the Native American Graves Protection and Repatriation Act (NAGPRA), be discovered during project construction, cease work immediately. Contact all required parties, and treat discovered items in accordance with applicable state and federal law(s). |

| Technical Resource Area | Best Management Practice/Environmental Protection Measure |
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| Geology and Soils | Phase clearing and grading to the maximum extent practical to prevent exposed inactive areas from becoming sources of erosion. |
| | Minimize the disturbance of steep slopes. |
| | Minimize erosion during and after soil disturbance using BMPs such as temporary seeding and planting, final vegetative cover, mulches, compost blankets, erosion-control blankets and mats, and soil tackifiers. |
| | Use water or a soil-binding agent or other dust-control technique as needed to avoid wind-blown soil. |
| | Preserve existing vegetation and revegetate open areas when practical. Do not remove temporary sediment-control practices until final vegetative cover or permanent stabilization measures are established. |
| | Maintain a natural vegetative buffer of at least 50 feet between disturbance areas and jurisdictional waters of the United States. |
| | Control stormwater discharges, including both peak flow rates and total stormwater volume, to minimize erosion at outlets and to minimize downstream channel and streambank erosion. BMPs used for these purposes include diversion of run-off; trench drains, slope drains, French drains, and subsurface drains; temporary diversion dikes; earthen berms; grass-lined or armored channels (such as turf reinforcement mats); drainage swales; energy dissipaters; rock outlet protection; drop inlets; and check dams. |
| | Control sediment as needed along the site perimeter and at all operational internal storm drain inlets at all times during construction, both internally and at the site boundary, by using BMPs such as sediment fences, buffer zones, sediment traps, rock filters, compost berms/compost socks, fiber wattles, storm drain inlet protection, and temporary or permanent sedimentation basins. |
| | Design impervious surfaces to drain to stormwater management systems. |
| | Create and maintain tree-lined borders to minimize viewshed impacts. |
| Obtain all required applicable permits in advance of construction activities and adhere to permit conditions during construction. | |
| Hydrology and Water Quality | Adhere to stormwater and erosion- and sediment-control BMPs as described under Geology and Soils (also described in Section 3.5.4 of the SEA). |
| | Obtain applicable Section 401/404 (Clean Water Act) permits, National Pollutant Discharge and Elimination (NPDES) permits, and local permits (e.g., utility/sewer connections). |
| | Complete work near waterbodies using equipment having the least impact (e.g., use of rubber-tired vehicles versus tracked vehicles). |
| | Ensure that no motorized equipment is operated (driven) in the water. |
| | Confine construction impacts to the minimum area necessary to complete the work. |
| | Perform work in a manner that does not inhibit fish passage. |

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| Technical Resource Area | Best Management Practice/Environmental Protection Measure |
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| Floodplains and Wetlands | Adhere to the stipulations in the Nationwide permit from the U.S. Army Corps of Engineers and the 401 Water Quality Certification from the Oregon Department of Environmental Quality. |
| | Carry out the approved compensatory credits. |
| Wildlife and Habitat | Instruct construction personnel to walk through the site immediately before clearing an area to search for any migratory songbird nests that may be affected. If necessary, establish nest-protection practices on a case-by-case basis. |
| | Prior to disturbance of the road rights-of-way that pass through the two areas of the property that are protected by conservation easement, conduct surveys to confirm the absence of Nelson’s checker-mallow and bald eagle nesting sites. Implement appropriate management strategies prior to construction, as necessary. |
| | Periodically remove invasive plant species from conservation areas on- site and restore with native plant species to the extent practicable. |
| Noise | Limit construction activity to daylight hours. |
| | Use properly maintained and muffled vehicles and equipment. |
| | Observe local noise ordinances at all times. |
| | Locate stationary operating equipment as far away from surrounding residents as possible. Shut down heavy equipment and other noise emitters when they are not in use. |
| | Conduct construction activities with a sensitivity toward maintaining the dignity and solemnity of the National Cemetery environment during interment services. |
| Transportation and Parking | Schedule construction activities in such a way that traffic increases do not coincide with typical morning and evening periods of increased traffic. |
| | Route construction equipment to minimize impacts on neighboring communities. |
| Utilities | None required |