DRAFT

Environmental Assessment

of the Proposed Rehabilitation and Operation of Buildings 205, 207, and 208

U.S. Department of Veterans Affairs Greater Los Angeles Healthcare System

West Los Angeles Medical Center

11301 Wilshire Boulevard

Los Angeles, California

U.S. Department of Veterans Affairs
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October 2018

EXECUTIVE SUMMARY AND CONCLUSIONS

In this Environmental Assessment (EA), the U.S. Department of Veterans Affairs (VA) analyzes and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with the VA's Proposed Action to enter into Enhanced-Use Lease (EUL) agreements with private-sector entities to create safe, affordable, permanent supportive housing for homeless veterans and their families at the VA's West Los Angeles Medical Center (WLAMC), located at 11301 Wilshire Boulevard, Los Angeles, California. The WLAMC is part of the VA's Greater Los Angeles Healthcare System (GLAHS). Under the EULs, three currently underutilized and vacant buildings, Buildings 205, 207, and 208, would be rehabilitated to provide approximately 172 units of housing to veterans—particularly chronically homeless, severely disabled, women, and the elderly. The housing would be operated based on the latest homelessness prevention and urban planning sciences, consistent with best practices and evidence-based approaches under the Housing First model. The rehabilitations would include seismic corrections, interior and exterior architectural rehabilitations, and building system and utility upgrades.

The conceptual plan for this Proposed Action was initiated in 2013 and is consistent with subsequent plans designed to support veterans in the GLAHS service area, including the West Los Angeles Leasing Act of 2016; the January 2015 settlement agreement to help the VA end veteran homelessness in Greater Los Angeles; and the VA's 2016 Draft Master Plan to provide bridge and permanent supportive housing and services for underserved veteran populations at the WLAMC.

Accordingly, the ***purpose*** of the Proposed Action is to enable the VA to provide permanent supportive housing for at-risk and homeless veterans and their families at the WLAMC. This is proposed to be accomplished by entering into a long-term ground lease with the private sector, to cost-efficiently rehabilitate and repurpose existing buildings into safe, affordable housing.

The VA ***needs*** to address the rising high volumes of veterans and their families who are homeless or at-risk of becoming homeless and the disproportionate lack of no-cost or affordable housing available to this community in Greater Los Angeles.

The Proposed Action and "No Action" alternatives are the two alternatives analyzed in this EA. A brief summary of each alternative is provided below:

- Under the ***Proposed Action***, the VA would use its authority to enter into EUL agreements with private-sector entities, who would make seismic retrofits, utility upgrades, and rehabilitate interior and exterior elements utilizing the Secretary of the Interior's *Standards for Rehabilitation* (*SOI Standards*) (36 CFR 67) at Buildings 205, 207, and 208, and repurpose these currently vacant buildings into approximately 172 units of housing dedicated homeless and at-risk veterans and their families. Approximately 68 units would be provided in Building 205, 50 units in Building 207, and 54 units in Building 208. Following rehabilitation, private-sector entities would operate and maintain the housing facilities under the EUL agreements.
- Under the No Action alternative, the VA would not enter EULs and would not rehabilitate or otherwise modify the current physical condition of Buildings 205, 207, and 208. These buildings would not be rehabilitated or repurposed as dedicated housing for homeless and at-risk veterans and their families. All three buildings would remain vacant for the foreseeable future. Seismic retrofits and other physical improvements would not be made apart from basic routine or emergency maintenance. Under the No Action alternative, the

number of housing units dedicated for homeless and at-risk veterans and their families at the WLAMC would not increase above current levels, placing an undue burden on underserved veteran populations in need of permanent housing in Greater Los Angeles. The No Action alternative is not consistent with the VA's 2016 Draft Master Plan and goal to help end veteran homelessness in Greater Los Angeles.

The following table summarizes the findings of the environmental analysis of the Proposed Action and the No Action alternative.

Resource / Issue	Proposed Action	No Action
Meets Purpose of and Need for Action	Yes.	No.
Aesthetics	Minor, short-term adverse impact from temporary presence of light and heavy equipment during construction and rehabilitation. Receptors limited to visitors and staff at WLAMC. Minor beneficial impact during operation, as building exteriors would be carefully restored per SHPO/SOI *Standards*.	Minor, long-term adverse impact, as building conditions fail due to deferred investment.
Air Quality	Minor, short-term adverse impact from temporary emissions from construction equipment; emissions are below *de minimis* thresholds. No impact during operation.	No impact.
Cultural Resources	Minor, short-term adverse impact on the West Los Angeles (WLA) VA Historic District during rehabilitation, while buildings are enclosed with scaffolding. Long-term, minor, beneficial impact during operation, as longevity of buildings' contribution to historic district is extended. Rehabilitation will be consistent with SOI *Standards*.	Minor, long-term adverse impact as building conditions fail due to deferred investment. Potential for demolition or otherwise remove buildings from WLA VA Historic District.
Geology, Topography, and Soils	Minor, short-term adverse impact due to potential for erosion of soil exposed during construction. No impact during operation, as soils would be revegetated to prevent and avoid erosion. No impact on geology or topography.	No impact.
Hydrology and Water Quality	No water bodies are present; therefore, no impact to surface water quality. Minor, short-term adverse impact on stormwater quality during construction. Minor, long-term beneficial impact on stormwater quality due to collection, filtration through bioswales, and use as irrigation water during operation.	No impact.
Wildlife and Habitat	No listed flora or fauna present. Negligible impact to existing urban species and habitat during construction or operation.	No impact.
Noise	Minor, short-term adverse impact due to temporary noise generated by light and heavy machinery associated with rehabilitations. Receptors include residents at adjacent Building 209 and transient visitors and staff in immediate vicinity of Building 207. No impact during operation.	No impact.
Land Use	No impact during construction or operation on land at or in immediate vicinity of the buildings or the campus. Repurposing of buildings is consistent with past, present, and future uses of the buildings for veterans' benefits programs.	No impact.

Resource / Issue	Proposed Action	No Action
Floodplains, Wetlands, and Coastal Zone Management	The project site contains no wetlands and is outside of floodplains and the Coastal Zone Management Zone. Negligible impact if nearby wetland received sediment-laden stormwater runoff during construction.	No impact.
Socioeconomics and Community Services	Minor, short-term localized beneficial impact from hiring local construction workers and purchasing materials and supplies from local vendors. Long-term, significant beneficial impact by providing no-cost permanent supportive housing to homeless and at-risk veterans and their families in Greater Los Angeles.	Long-term, significant adverse impact on veteran populations unable to afford housing in Greater Los Angeles. These populations would continue to experience adverse socioeconomic pressures.
Solid and Hazardous Materials	Minor, short-term adverse impact if regulated building materials (asbestos, lead, and polychlorinated biphenyls) are released to the environment during construction.	No impact.
Transportation and Parking	Short-term, less-than-significant adverse impact from temporary road or lane closures during utility upgrades.	No impact.
Utilities	Negligible, short-term adverse impact on utilities during upgrades. Negligible beneficial impact from discontinuing steam service. Minor, long-term beneficial impact during operation due to increase energy efficiency building upgrades and utility distribution.	No impact.
Environmental Justice	Long-term, significant beneficial impact on environmental justice by improving conditions for the veteran population in Greater Los Angeles.	Long-term, significant adverse impact due to no increase in dedicated housing for homeless and at-risk veterans in Greater Los Angeles.
Potential for Generating Substantial Controversy	No objections anticipated on Proposed Action to provide homeless and at-risk veterans and families with permanent supportive housing at the WLAMC.	Substantial controversy anticipated at local, state, and federal level due to non-compliance with mission and prior commitments to provide permanent supportive housing at the WLAMC.

The impacts from the Proposed Action, when considered on a cumulative basis with impacts from past and reasonably foreseeable projects in the immediate vicinity of Buildings 205, 207 and 208, remain at less-than-significant adverse levels for all of the environmental resources analyzed in this EA. Although the No Action alternative would have no impact on the majority of environmental resources considered in this EA, the lack of action to provide housing for homeless and at-risk veterans at the WLAMC would have a significant adverse impact most notably on community services, socioeconomics, and environmental justice. The No Action alternative, when considered cumulatively with impacts—adverse or beneficial—from reasonably foreseeable actions, would continue to have a significant adverse impact on the aforementioned resources, as it fails to address the current and long-term need for dedicated housing for homeless and at-risk veteran populations in Greater Los Angeles. Additionally, the No Action alternative hinders the ability of community health and safety service providers to

effectively support these populations, and does not meet the VA's goal to provide homeless housing at the WLAMC.

As part of the public involvement process, the VA invites regulatory stakeholders and the general public to review and provide comments on the analyses presented in this draft EA. The VA will review comments received during the 30-day comment period. Additionally, the regulatory stakeholders and general public will have an opportunity to provide comments at the public meeting to be held at the WLAMC during the 30-day period. Relevant and applicable comments will be documented and addressed in the Final EA.

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ACRONYMS AND ABBREVIATIONS

AAQS	Ambient Air Quality Standard
ACM	Asbestos-containing Building Materials
ACS	American Community Survey
amsl	Above Mean Sea Level
BHP	Brake Horsepower
BMPs	Best Management Practices
BST	Buried Site Testing
BTU	British Thermal Unit
CA	California Environmental Quality Act
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CARB	California Air Resources Board
CCC	California Coastal Commission
CCR	California Code of Regulations
CEQ	Council on Environmental Quality
CEQA	California
CFR	Code of Federal Regulations
CGP	Construction General Permit
CH_4	Methane
CMZ	Coastal Management Zone
CO	Carbon Monoxide
CUPA	Certified Unified Program Agency
CZMA	Coastal Zone Management Act
dBA	A-weighted decibels
DOI	Department of the Interior
EA	Environmental Assessment
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act
EO	Executive Order
ESA	Environmental Site Assessment
EUL	Enhanced-Use Lease
FCD	Flood Control District
FE	Federally-Endangered
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
FY	Fiscal Year
GCR	General Conformity Rule
GEMS	Green Energy Management System
GHG	Greenhouse Gases
GLAHS	Greater Los Angeles Healthcare System
GPM	Gallons per Minute
HAP	Hazardous Air Pollutant
HUD-VASH	Housing and Urban Development-VA Supported Housing
HVAC	Heating/Ventilation/Air Conditioning

KVA	Kilovolt-Ampere
KW	Kilowatt
LA	Los Angeles
LACDPW	Los Angeles County Department of Public Works
LADBS	Los Angeles County Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAHSA	Los Angeles Homeless Services Authority
LARWQCB	Los Angeles Regional Water Quality Control Board
LASAN	City of Los Angeles Sanitation
LAX	Los Angeles International Airport
LBP	Lead-Based Paint
LID	Low Impact Development
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
MWh	Mega Watt Hour
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NIOSH	National Institute for Occupational Safety and Health
NO_2	Nitrogen Dioxide
NOA	Notice of Availability
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollution Discharge Elimination System
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
O_3	Ozone
OCFM	VA Office of Construction and Facilities Management
ODS	Ozone-depleting Substances
OSHA	Occupational Safety and Health Administration
Pb	Lead
PCB	Polychlorinated Biphenyls
PM	Particulate Matter (PM2.5, PM10)
PPM	Parts Per Million
PTE	Potential to Emit
PV	Photo Voltaic
PVC	Polyvinyl Chloride
QSD	Qualified Storm Water Pollution Prevention Plan (SWPPP) Developer
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Conditions
ROG	Reactive Organic Gases

ROI	Region of Influence
RONA	Record of Non-Applicability
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SE	State-Endangered
SESC	Soil Erosion and Sedimentation Control
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
SCE	Southern California Edison
SOI	Secretary of the Interior
SOP	Standard Operating Procedure
SSVF	Supportive Services for Veteran Families
Standards	Secretary of the Interior's *Standards for Rehabilitation* (36 CFR 67)
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TPY	Tons Per Year
U.S.	United States
UCLA	University of California, Los Angeles
USAF	United States Air Force
USC	University of Southern California
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VA	Veterans Affairs
VASH	VA-Supported Housing
VOCs	Volatile Organic Compound
WLA VA	West Los Angeles Veterans Affairs
WLAMC	West Los Angeles Medical Center

1. INTRODUCTION

The United States (U.S.) Department of Veterans Affairs (VA) West Los Angeles Medical Center (WLAMC) is part of the larger VA Greater Los Angeles Healthcare System (GLAHS) that serves over 90,000 unique veterans in Kern, Los Angeles, San Luis Obispo, Santa Barbara, and Ventura counties (Figure 1). The WLAMC campus is located at the major intersection of Sepulveda Boulevard, Interstate 405 (also known as the San Diego Freeway) and Wilshire Boulevard in Los Angeles (LA), California. The campus is located in the densely urbanized Brentwood neighborhood, and encompasses approximately 388 acres. The WLAMC campus is one of largest medical center campuses in the VA system. It provides a full range of medical services to eligible veterans, including state-of-the-art hospital and outpatient care, rehabilitation, residential care, and long-term care services. It also serves as a center for medical research and education. The WLAMC serves as a major training site for medical residence in partnership with the David Geffen School of Medicine the University of California, Los Angeles (UCLA) and University of Southern California (USC) School of Medicine as well as more than 45 colleges, universities, and vocational schools in 17 different medical, nursing, and other healthcare and administrative programs.

Under the Proposed Action, the supportive housing capacity within the WLAMC would be increased by implementing the design plans originally developed in 2013 for the rehabilitation and reuse of Buildings 205, 207, and 208 (Castle-Rose, 2015). This Proposed Action is consistent with the subsequent 2016 WLAMC Draft Master Plan (VA, 2016a) that outlines the long-term plan to help the VA achieve its goal to revitalize the campus to be veteran focused. This goal includes making supportive housing and other services available at the WLAMC, so veterans will have a choice to live on or off campus and have access to a more welcoming and healing environment in which to live and receive care, services, and benefits to which they are entitled. The Draft Master Plan calls for the VA to determine and implement the most effective use of the campus for veterans, particularly for homeless veterans, including underserved populations such as female veterans, aging veterans, and those who are severely physically or mentally disabled.

1.1 Purpose and Need

Accordingly, the ***purpose*** of the Proposed Action is to enable the VA to provide permanent supportive housing for at-risk and homeless veterans and their families at the WLAMC. This is proposed to be accomplished by entering into long-term ground leases with the private sector, to cost-efficiently rehabilitate and repurpose existing buildings into safe, affordable housing.

The VA ***needs*** to address the rising high volumes of veterans and their families who are homeless or at-risk of becoming homeless and the disproportionate lack of no-cost or affordable housing available to this community in Greater Los Angeles.

1.2 Overview of the Proposed Action

Under the Proposed Action, the VA would enter into Enhanced-Use Leases (EULs) with the private-sector to create safe, affordable, permanent supportive housing for homeless and at-risk veterans and their families at the WLAMC. This Proposed Action is consistent with the West Los Angeles Leasing Act of 2016; the January 2015 settlement agreement to help the VA end veteran homelessness in Greater Los Angeles; is a key component of the VA's mission to provide housing for at-risk and homeless veterans; and is consistent with the VA's Draft Master Plan to provide bridge and permanent supportive housing and services at the WLAMC for underserved veteran populations.

In 2013, the VA identified Buildings 205, 207, and 208 in the WLAMC north campus as suitable EUL candidates for rehabilitation and repurposing into dedicated housing for homeless and at-risk veterans and their families. The location of these buildings is depicted on the map presented in Figure 2. Detailed photographs of each of these buildings and surrounding areas can be found in Appendix A. Currently, all three buildings are vacant. Buildings 205, 207, and 208 were constructed in 1937, 1940, and 1945, respectively, and are contributing resources to the WLAMC Historic District.

Under the EULs, the private-sector entities would rehabilitate Buildings 205, 207, and 208, and repurpose them into residences, providing approximately 172 units of housing for veterans—particularly those who are chronically homeless, severely disabled, women, and aging. Approximately 68 units would be provided in Building 205, 50 units in Building 207, and 54 units in Building 208. The housing would be operated based on the latest homelessness prevention and urban planning sciences, and be consistent with best practices and evidence-based approaches under the Housing First model.

The rehabilitations would include seismic corrections, interior and exterior architectural rehabilitations, and building systems upgrades. The proposed rehabilitations would be accomplished in consultation with the California State Historic Preservation Officer (SHPO) as required by Section 106 of the National Historic Preservation Act (NHPA), in order to address adverse effects of rehabilitation of these historic resources. Additionally, under the Proposed Action, selected existing utility lines (electric, potable water, sanitary sewer) would be replaced by extending new lines from the respective mains to each of the three buildings, following existing subsurface utility corridors. These utility upgrades would ensure that sufficient utility service is available to support the proposed residential demand at each building.

Following rehabilitations, private-sector entities would operate and maintain the new housing facilities at Buildings 205, 207, and 208, under long-term EULs.

Specific details about the elements included in the Proposed Action are provided in Section 2.1.

1.3 Regulatory Basis for the Environmental Assessment

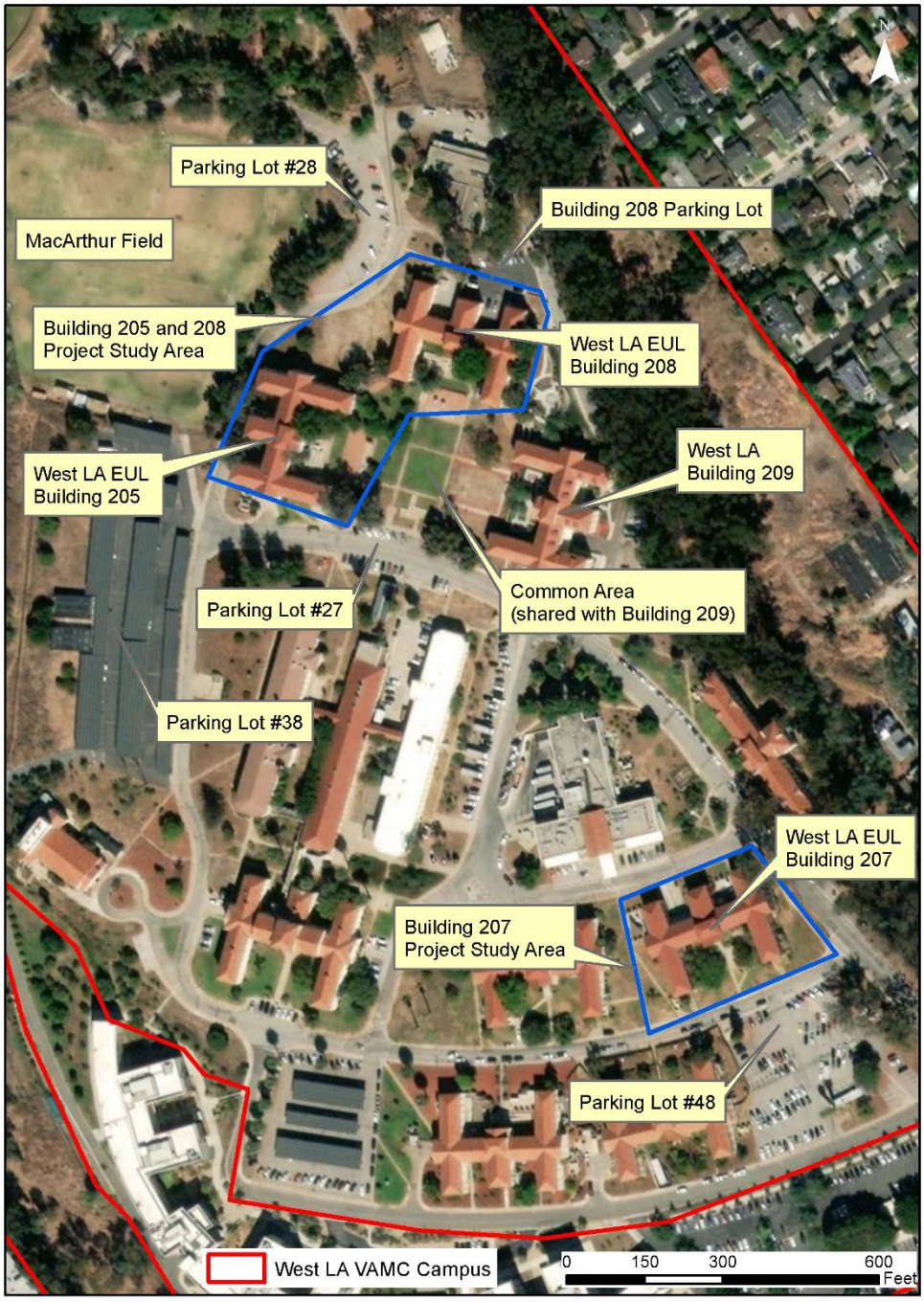
Prior to implementing a Proposed Action, the VA is required to conduct an Environmental Assessment (EA) in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 United States Code 4321 et seq.), the White House Council on Environmental Quality (CEQ) "Regulations Implementing the Procedural 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 (VA, 2010). These requirements specify that the VA must evaluate the potential environmental impacts of VA facilities, operations, and related funding decisions prior to taking action.

The VA must apply the NEPA review process and use the information to make an informed decision prior to undertaking a Proposed Action. An EA provides sufficient evidence and analysis for determining whether an action would cause significant environmental impacts (requiring an Environmental Impact Statement [EIS]) or the agency can issue a finding of no significant impact (FONSI) (40 CFR 1508.9). A FONSI is a decision document that briefly presents the reasons why an action would not have a significant effect on the human environment (40 CFR 1508.13). As required by NEPA and the implementing regulations from CEQ and VA, the alternative of taking

no action is evaluated, providing a baseline for comparison of potential impacts from the action alternative(s).

Figure 1. WLAMC Location Map

Figure 2. Locations of Buildings 205, 27, and 208, and Selected Parking Areas in the North Campus



1.4 Decision Making

Accordingly, the VA has prepared this EA to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with implementing the construction and operational elements of the Proposed Action. Additionally, this EA evaluates the potential impacts associated with taking No Action (i.e., not implementing the Proposed Action), where the conditions as they currently exist at Buildings 205, 207, and 208 would remain unchanged.

Additionally, the VA, as a federal agency, is required to incorporate environmental considerations into its decision-making process for the actions it proposes to undertake. This is done according to the regulations and guidance identified above. As such, this EA:

- Informs the public of the possible environmental impacts of the Proposed Action and its considered alternatives, as well as methods to reduce these impacts,
- Provides for public, state, inter-agency, and tribal input into the VA's planning and evaluation,
- Documents the NEPA process, and
- Supports informed decision-making by the Federal Government.

As the decision document for this proposed federal undertaking, this EA also identifies the actions to which the VA would commit to minimize environmental effects, as required under NEPA, its implementing regulations from CEQ (40 CFR 1500–1508) and VA (38 CFR Part 26), and the VA's NEPA guidance (VA, 2010). The decision to be made is whether—having considered the potential physical, environmental, cultural, and socioeconomic effects—the VA should implement the Proposed Action including, as appropriate, measures to reduce adverse effects.

2. Description of the Proposed Action and Alternatives

NEPA, and the regulations of CEQ and VA for implementing NEPA, require all reasonable alternatives to be rigorously explored and objectively evaluated. Accordingly, this chapter summarizes the process used to develop alternatives and provides a description of the subsequently selected Proposed Action and its alternative.

The alternatives evaluated in this EA are the Proposed Action and No Action. The Proposed Action is described in detail in the following section. The No Action Alternative is evaluated in this EA pursuant to NEPA requirements, and provides a baseline against which the Proposed Action may be evaluated.

2.1 Proposed Action

Los Angeles County continues to have the largest population of homeless veterans in the U.S. The number of homeless veterans in Los Angeles County was approximately 3,071 in 2016, increased to 4,742 in 2017, and decreased to 3,819 by 2018 (Los Angeles Homeless Services Authority, 2018). As part of the VA's mission to provide housing for homeless and at-risk veterans, the WLAMC currently provides approximately 544 beds for on-campus patient treatment and homeless veteran programs. The VA also provides veterans with off-campus transitional and permanent housing assistance, with support from a number of organizations including Health Care for Homeless Veterans, Community of Friends, U.S. VETS, and the U.S. Department of Housing and Urban Development (HUD), and others. The VA is currently proposing to increase the homeless housing capacity within the WLAMC by implementing the design plans originally developed in 2013 for the rehabilitation and reuse of Buildings 205, 207, and 208 (Castle-Rose, 2015). This "Proposed Action" would help to address the current shortfall in homeless housing capacity and be consistent with the VA's framework for providing permanent supporting housing at the WLAMC subsequently described in the 2016 Draft Master Plan (VA, 2016a).

Under the Proposed Action, the VA would use its authority to enter into EUL agreements with private-sector entities, who would make seismic retrofits, utility upgrades, and rehabilitate interior and exterior elements of Buildings 205, 207, and 208, and repurpose these buildings to provide approximately 172 units of housing dedicated to homeless and at-risk veterans and their families. As contributing resources to the WLA VA Historic District, the proposed rehabilitations to Buildings 205, 207, and 208 would be accomplished in consultation with the California SHPO; VA intends to utilize the SOI *Standards* to avoid adverse effects to historic resources. Following rehabilitation, private-sector entities would operate and maintain the housing facilities at Buildings 205, 207, and 208 under long-term EULs.

Specific details regarding the rehabilitations and development are provided under the following subheadings.

Seismic Corrections

The interior structural system of Buildings 205, 207, and 208 will be modified to have adequate strength to resist the design's lateral and moment forces during a major seismic event. This, together with non-structural seismic corrections, will bring this building to an acceptable level of compliance with the City of Los Angeles Ordinance 183893 requirements. Strengthening may include:

- Diaphragm

  The building diaphragms (horizontal floors, roof, etc.) will be strengthened as follows:

  - Roof: New plywood sheathing will be added under the existing clay roof tiles (tiles will be removed then reinstalled).
  - Concrete Floor Slabs: The concrete floor slabs will be strengthened by adding reinforced concrete to the areas between the existing ribs located on the underside of the floor slab.

- Concrete Beam/Column Reinforcement
  - Reinforced concrete will be added to the existing columns and pilasters at the exterior walls as required.
  - Beams: Reinforced concrete will be added to each side of the existing concrete beams.
  - Connections between horizontal elements and vertical elements (walls/columns, etc.) will be modified/ upgraded.

- Non-Structural
  - The buildings' interior will be completely rehabilitated, and all new systems will be provided and installed to meet current codes. All non-structural elements provided will be installed and braced as required to meet current City of Los Angeles seismic code requirements.

Architectural Rehabilitation

Buildings 205, 207, and 208 will be completely rehabilitated. With the exception of the structural systems and exterior building envelopes, all systems and interior elements will be replaced. These rehabilitation elements will include but are not limited to those in the following list.

- Building 205
  - New VA accessible ramps (avoid using 'handicap') will be provided at all exterior entrances.
  - New accessible toilet facilities will be provided.
  - New panic hardware and doors will be provided at all exits.
  - New code compliant signage will be provided.
  - A new continuous handrail will be provided at the existing stairs.
  - Two additional stairways added to meet current life-safety code requirements.

  - The exterior ground will be regraded, new storm drains and lines installed, and waterproofing added in order to divert stormwater away from foundations and basement.
  - The building interior will be entirely reconfigured to support new residential units, staff offices, and support facilities per the VA provided program.
  - Repair or replace all metal sash windows to match the original historical design and materials.
  - Add glass Entry Canopy.
  - Add New Plaza at South Elevation.
  - A new garden will be installed at the area between 205 and 208.
  - The building exterior will be repaired, cleaned, and painted.
  - New central variable air volume heating/ventilation/air conditioning (HVAC) system will be provided, installed, and commissioned.
  - New copper plumbing will be installed to meet the current VA legionella directive.

- Building 208
  - General Exterior
    - Plaster finish will be protected during construction and repaired or patched where damage is evident due to efflorescence, delamination, spalling, etc. Loose and flaking paint will be manually removed, and the exterior will be painted. Proposed paint color will closely match the historical, integrally colored stucco and will be consistent with Building 205 (and the adjacent Building 209).
  - New VA accessible ramps (avoid using 'handicap') will be provided at all exterior entrances.
  - New accessible toilet facilities will be provided.
  - New panic hardware and doors will be provided at all exits.
  - New code compliant signage will be provided.
  - New central HVAC system will be provided, installed, and commissioned.
  - A new continuous handrail will be provided at the existing stairs.
  - Two additional stair ways will be added to meet current life-safety code requirements.
  - The exterior ground will be regraded, new storm drains and lines installed, and waterproofing added in order to divert stormwater away from foundations and basement.
  - The building interior will be entirely reconfigured to support new residential units, staff offices and support facilities per the VA provided program.
  - Repair or replace all metal sash windows to match the original historical design.

  - Add glass Entry Canopy.
  - Add New Plaza at South Elevation.
  - A new garden will be installed at the area between Buildings 205 and 208.
  - The building exterior will be repaired, cleaned, and painted.
  - Replace flat built-up roofing at connecting corridors, which has reached end of life.
  - Replace roof tiles as needed and re-roof flat roof at enclosed passageway.
  - Repair or replace original metal sash windows.
  - Replace Handicap Accessible Ramp.
  - Add New Glass Entry Canopy.
  - Add New Entrance Atrium.
  - New copper plumbing will be installed to meet the current VA legionella directive.
- Building 207
  - New VA accessible ramps (avoid using 'handicap') will be provided at all exterior entrances.
  - New accessible toilet facilities will be provided.
  - New panic hardware and doors will be provided at all exits.
  - New code compliant signage will be provided.
  - A new continuous handrail will be provided at the existing stairs.
  - The building interior will be entirely reconfigured to support new residential units, staff offices, and support facilities per the VA provided program.
  - Repair or replace all metal sash windows to match the original historical design.
  - The building exterior will be repaired, cleaned, and painted.

Life Safety and Building Systems Upgrades

Buildings 205, 207, and 208 will receive a complete update to current building code for building systems and life safety elements such as mechanical, electrical, plumbing, fire sprinkler, emergency egress systems, etc.

- Buildings 205, 207, and 208
  - Add compliant emergency exits & signage
  - Installation of new ductwork system
  - Additional stair entrances to comply with Fire Code
  - New stairwells to comply with Fire Code
  - New accessible ramps at entrances
  - Electrical upgrades including elevator
  - Upgrade fire emergency system.

External Utility Service Upgrades

Under the Proposed Action, the private entities would be responsible for obtaining, operating, and maintaining all utility services at the three buildings. Additionally, the private entities would be responsible for installing new physical utility lines along existing utility corridors for potable water, sanitary sewer, and electric services between existing unity mains and Buildings 205, 207, and 208.

For the potable water utility provided by the Los Angeles Department of Water and Power (LADWP), new subsurface lateral piping would be extended from the Brentwood main and connected to each of the buildings. New piping would be installed within the existing underground utility corridor. For the electrical utility provided by SCE, a new trunk line would be extended from Constitution Avenue, follow the existing underground electrical duct bank along Bonsall Avenue, and then branch off to each building. For the sanitary sewer system utility provided by LADWP, new branch laterals would be extended from each building to the existing main beneath Vandergrift Avenue, which eventually discharges south of the WLAMC for treatment.

The existing stream and natural gas lines would be disconnected from each building, as these utilities would no longer be used during the Proposed Action operations. No changes to the existing stormwater system at each building are planned under the Proposed Action.

2.2 No Action Alternative

The No Action alternative serves as a benchmark against which the effects of the Proposed Action can be evaluated, as required under the CEQ Regulations (40 CFR Part 1502.14). For this project, No Action is defined as not implementing the Proposed Action.

Under the ***No Action*** alternative, the VA would not enter EULs, would not rehabilitate or otherwise modify the current physical condition of Buildings 205, 207, and 208, and would not repurpose these currently vacant buildings for housing for the foreseeable future. As a result, the WLAMC would not modify its homeless veteran housing inventory. Seismic retrofits and other physical improvements would not be made apart from basic routine or emergency maintenance, while overall building conditions would continue to deteriorate due to deferred investment. Under the No Action alternative, the number of housing units at the WLAMC dedicated for at-risk and homeless veterans and their families would not increase above current levels, placing an undue burden on underserved veteran populations in need of permanent housing. The No Action Alternative would not meet the purpose and need for the Proposed Action and would not provide much needed housing to homeless veterans in the Greater Los Angeles area. Additionally, a greater burden would be placed on non-VA associated homeless services in the Greater Los Angeles area. The No Action alternative is not consistent with the Draft Master Plan and the goal to help end veteran homelessness in the Greater Los Angeles area.

3. Affected Environment and Environmental Consequences

This section includes the detailed analysis of potential impacts to the physical, environmental, cultural, and socioeconomic resources anticipated from implementing the Proposed Action or the No Action alternative. The analysis for each resource includes a description of the existing conditions, applicable regulatory requirements associated with construction and operation of the Proposed Action, as well as any resource-specific management or mitigation measures necessary to minimize any potential adverse impacts from implementing the Proposed Action.

For the purposes of this EA, the Project Study Areas for the Proposed Action include the building footprint and the landscaped area immediately surrounding each building where construction equipment would be staged, as well as the utility corridors for selected utilities (electric, water, sanitary sewer) that would be disturbed during removal of existing lines and replacement with new lines. A broader "Region of Influence" is considered for those selected topics (e.g. air quality, noise, community services, etc.) that could potentially be indirectly or directly impacted by the Proposed Action construction and operation activities.

The analyses consider both administrative and physical elements of the Proposed Action on each resource. The administrative element of the Proposed Action is represented by the VA entering into EUL agreements with private-sector entities. Unless otherwise noted in each section, this administrative element would have no impact. The physical elements of the Proposed Action include both construction (rehabilitations) and, once construction is completed, the operational activities (reuse as housing). These physical elements have the potential to impact all the resources described herein, and therefore are evaluated in all sections.

The existing conditions were based on information obtained during a site reconnaissance on August 7-9, 2017 (at Buildings 205 and 208), on November 30, 2017 (Building 207), interviews with WLAMC representatives, and available published information as referenced in each resource analysis. It is noted that a "Draft Supplemental Environmental Assessment for the Proposed Seismic Upgrade and Renovation of Buildings 205 and 208," dated April 24, 2015, was prepared for an earlier proposal to rehabilitate Buildings 205 and 208 (Castle-Rose, 2015). While some elements of the current Proposed Action were previously described in that 2015 document, the level of analysis was insufficient to make an informed decision about the project impacts; therefore, no further reference to the 2015 report is made in this EA.

3.1 Aesthetics

3.1.1 Existing Environment

The WLA campus is located approximately two miles south of the Santa Monica Mountains between Sunset Boulevard to the north and Ohio Avenue to the south in an unincorporated area of Los Angeles County, surrounded by the City of Los Angeles. Wilshire Boulevard transects the lower one-third portion of the site. Interstate Highway 405 is located to the immediate east of the site and San Vicente Boulevard is to the west of the site. The WLAMC is roughly rectangular in shape, extending northwest to southeast, along Interstate 405, which borders the northeast side of the campus. The WLAMC is generally about three times as long as it is wide in a north-south direction, with some irregular boundaries from prior land sales and transfers. The Sepulveda Channel runs parallel to the medical center.

Buildings 205, 207, and 208 are all located within the north campus, which is the portion of the WLAMC property north of Wilshire Boulevard. Representative photographs of Building 205, 207, 208 and their immediate surroundings are provided in Appendix A. The north campus has a wide range of facility types, including administrative, mental health facilities, residential lodging with and without mental services, community living centers, research facilities, support and logistics, shared spaces and several vacant buildings, as well as recreational areas including athletic fields, a golf course, and gardens.

The north campus contains over 50 buildings, many of which were constructed more than 60 years ago. While many of the buildings are in poor condition, they are considered contributing resources to the WLAMC historic district. As described in greater detail under the Cultural Resources heading in Section 3.3, Buildings 205, 207, and 208 are all contributing elements to the WLAMC Historic District due to their historical significance, functions, and architecture.

The buildings and surrounding grounds are professionally maintained by the WLAMC staff. Paved roadways and parking areas throughout the north campus provide access to vehicles traveling in this area throughout the day. This built infrastructure dominates the aesthetic environment of the north campus.

The Project Study Areas are generally not visible from outside of the WLAMC, primarily due to their central location within the north campus, as well as the presence of a wooded area along the eastern boundary of the north campus, and a sound barrier wall on I-405. The views looking out from the Project Study Areas are dominated by other buildings, roadways, and trees. However, the Getty Museum, located atop a large hill approximately 1-mile north of the WLMAC, is visible from the northern portion of Patton Avenue, near Buildings 205 and 208.

Additional information about the aesthetic condition associated with each Project Study Area and building is provided in the following subheadings.

Buildings 205 and 208

Buildings 205 and 208 are located adjacent to each other, near the northeastern border of the WLAMC north campus. Both buildings are currently vacant. Building 209 is adjacent to, and west of these buildings. In June 2017, rehabilitations (seismic corrections, life safety improvements, architectural rehabilitation and building system upgrades) were completed at Building 209, converting it from medical services into a residential facility that currently provides approximately 54 units of permanent supportive housing. The three entrance sides of Buildings 205, 208, and 209 enclose a small grass-covered courtyard. Bonsall Avenue forms the southern boundary of the courtyard, while Patten Avenue (a circular road) bounds the western, northern, and eastern sides of the area. Similar to Building 209, both Buildings 205 and 208 are H-shaped, 3-story structures, designed with elements of Mission Revival style. Each building has a smooth stucco exterior and a terra cotta tile cross gable roof. Additional information regarding building histories and architectural features is provided under the Cultural Resources heading in Section 3.3. The rehabilitations to Building 209 did not result in any adverse impacts on the aesthetic quality in this area or elsewhere within the WLAMC.

The Building 205 and 208 Project Study Area includes two paved parking lots (Parking Lot No. 27 and the unnumbered parking area on the north side of Building 208). These parking areas are currently used by WLAMC staff, visitors, and residents.

The Building 205 and 208 area is improved with one above-ground storage tank, an emergency generator, and an electrical transformer; these structures are located on an enclosed concrete pad on the southern side of Building 205.

The grass-covered grounds, brick patios, and street lamps are maintained by the WLAMC. The grounds are used by WLAMC staff, visitors, and residents.

The Building 205 and 208 Project Study Area is visible to staff, visitors, and residents at Building 209; from vehicles traveling along Bonsall Avenue to the south; and from Patton Avenue to the west, north, and east. Trees and other vegetation to the west, north, and east obscure views into the area.

Building 207

Building 207 is located in the central portion of the WLAMC north campus. Building 207 is currently vacant. Building 207 is an H-shaped, 3-story structure, designed with elements of Mission Revival style. It has a smooth stucco exterior and a terra cotta tile cross gable roof. Additional information regarding the building history and architectural features is provided under the Cultural Resources heading in Section 3.3. The aesthetic condition of this area is dominated by buildings, parking areas, roads, and limited vegetation. Located to the immediate west of Building 207 is Building 206, which is used as a Research/Mental Health/Homeless Housing facility. Building 300 is located to the immediate north of Building 207 on Arnold Avenue and houses the information technology department and a kitchen. Building 256 is located southwest of Building 207 and is used as a mental health day treatment center.

The Building 207 site is bordered by Arnold Avenue, to the south by Vandergrift Avenue, to the east by Bonsall Avenue, and to the west by Building 206. A grass covered area and paved walkway separates Buildings 207 and 206.

The Building 207 site is improved with one electrical transformer on the west side, a fire emergency area on the east side, and an enclosed courtyard and recreation area on the north side. A loading dock is located behind Building 207. The loading dock area is currently used as open storage space for various pieces of large furniture and unused utility equipment.

The Building 207 site is visible to visitors and staff from Buildings 206, 210, 256, and 300, and from vehicles travelling along Bonsall Avenue, Arnold Avenue, and Vandergrift Avenue.

3.1.2 Environmental Consequences

The following analysis of the construction and operation of the Proposed Action applies to all three buildings unless otherwise stated.

3.1.2.1 Proposed Action

Construction. As discussed in further detail under the Cultural Resources heading in Section 3.3, the design and rehabilitation of the buildings would be consistent with the *SOI Standards* to preserve the integrity of the WLA VA Historic District. The Proposed Action construction activities (interior and exterior rehabilitations) would take no more than 24 months for Buildings 205, 208, and 207 (VA communication, November 2017). Rehabilitation of the building exteriors and interiors would include standard construction equipment including scaffolding, lifting platforms, and material transport vehicles. Construction vehicles, equipment, and materials would be staged next to each building where the work is performed. At Buildings 205 and 208, the

staging area would be the approximately 10,000-square foot grass-covered area located between the two buildings and Patton Avenue (Figure 3). This area was previously used as a construction/equipment staging area from 2011-2017; this use did not result in any reported adverse impacts on aesthetic conditions during that period. The construction staging area at Building 207 would be located in the concrete-paved loading dock area on the northern side of the building (Figure 4). The view of this loading dock is blocked by the building spine and wings; only the northern side of the loading dock is visible from Arnold Avenue.

Figure 3. Building 205 and 208 Project Study Area - Construction Staging Area

Figure 4. Building 207 Project Study Area - Construction Staging Area

The presence of construction equipment and unfinished stages of rehabilitation would temporarily impact the visual aesthetics of the Project Study Areas. Construction activities at Buildings 205 and 208 would be most visible to occupants of Building 209, which has a direct view of Buildings 205 and 208. Construction activity also would be partially visible to visitors and staff working across from Buildings 205 and 208 on Bonsall Avenue. Construction activities at Building 207 would be most evident to visitors and staff at Buildings 210, 300, 206, and 256, as Building 207 is visible from those buildings, as well as passersby long Arnold Avenue, Bonsall Avenue, and Vandergrift Avenue.

Construction activities would be focused on exterior and interior building rehabilitations and generally would not disturb the landscaping around each building. However, the movement of construction vehicles across the grass-covered grounds has the potential to damage or remove the vegetative cover, exposing surface soil and resulting in the potential to release fugitive dust. Rehabilitation of the buildings' exteriors can also lead to the release of fugitive dust if the surface is friable and not wetted or otherwise enclosed. Additionally, excavation within the utility corridors would also temporarily expose subsurface soils, which can be exposed to wind erosion and generate fugitive dust. Generation of fugitive dust can lead to nuisance concerns if the dust accumulates on nearby surfaces or is visible in the air for prolonged periods.

To minimize the impact of construction activities on aesthetics, the construction contractors would erect a privacy fence around the building construction areas, and prevent damage to existing ground-cover vegetation surrounding each building. Additionally, the potential for fugitive dust emissions would be limited by using water trucks to prevent fugitive dust from being emitted into the air and its potential deposition on nearby surfaces.

Considering the natural viewshed obstructions and incorporation of construction best management practices (BMPs) to reduce dust generation, the limited number of receptors who can see the construction areas, and the short-term duration of construction activities (24 months), construction of the Proposed Action would have a short-term, direct, less-than-significant adverse impact on aesthetics.

It is also noted that Building 209, which is adjacent to Buildings 205 and 208, underwent similar rehabilitations that are proposed for all three buildings. During the Building 209 rehabilitation period, no reports of adverse impacts to the aesthetic quality of the Building 209 area were reported.

Management practices to limit and further reduce potential construction-related impacts are summarized in Section 5.0 in this EA.

Operation. Following construction, the aesthetic appearance of Buildings 205, 207, and 208 would be consistent with, and similar, to their original condition. The rehabilitation of the buildings would adhere to the requirements of the *SOI Standards* and maintained in a manner that increases the functionality and preserves the integrity of the WLA VA Historic District. . During operation, maintenance of the buildings and their surrounding grounds and vegetation would be maintained as part of scheduled landscaping activities by the private entities.

Therefore, operation of the Proposed Action would be anticipated to have an overall long-term, direct, less-than-significant beneficial impact on aesthetics.

Management practices to maintain this beneficial impact are summarized in Section 5.0 in this EA.

3.1.2.2 No Action

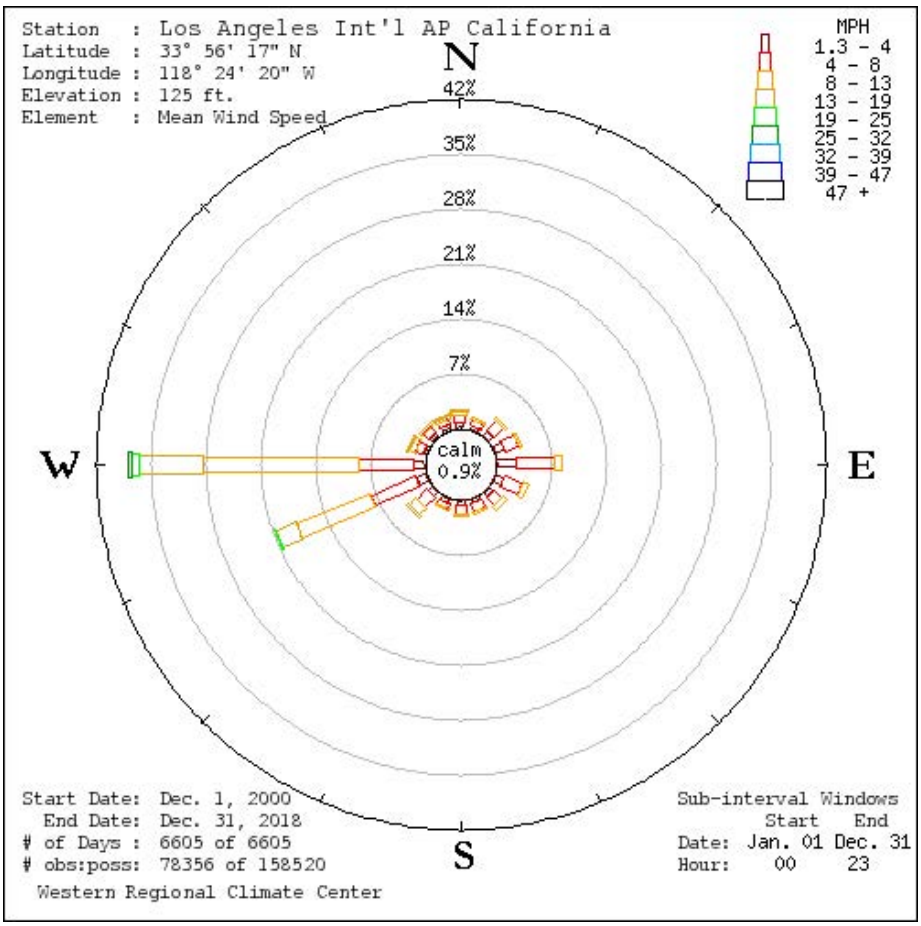
Under the No Action alternative, no changes would occur to the current aesthetic or visual character of Buildings 205, 207, and 208. Taking no action make cause historical features with culturally significant value to deteriorate over time, decreasing the pride of veterans, visitors, and staff at the WLAMC. Therefore, the No Action alternative would result in an overall long-term, direct, less-than-significant adverse effect on the aesthetic condition of these buildings at the WLAMC.

3.2 Air Quality

3.2.1 Regional Climate

Weather and climate are important influences on air quality. The WLAMC is located in Los Angeles County, approximately eight miles east of the Pacific Ocean, at an elevation of approximately 420-feet above mean sea level (amsl). Local climatological data station details provided from the Lost Angeles International Airport indicate that the average summer temperature is 84.8°F (August) and average winter temperature is 48.3°F. The driest month in Los Angeles County is July with 0.01 inches of precipitation, and with 3.68 inches February is the wettest month (NOAA, 2017). A shown in Figure 5, the predominant wind direction is from west to east, based on measurements taken at the Los Angeles International Airport from 2000 to 2018 (Western Regional Climate Center, 2018).

Figure 5. Wind Direction, 2000-2018



3.2.2 Air Quality Standards

3.2.2.1 National Ambient Air Quality Standards

The Clean Air Act (CAA) and its subsequent amendments require the U.S. Environmental Protection Agency (USEPA) to establish the National Ambient Air Quality Standards (NAAQS) for pollutants that may endanger public health or welfare. The USEPA has promulgated primary and secondary NAAQS for six criteria pollutants including:

- carbon monoxide (CO),
- nitrogen dioxide (NO_2),
- ozone (O_3),
- lead (Pb),
- sulfur dioxide (SO_2),
- particulate matter (PM), including:
    - particulate matter sized 10 microns or less (PM_{10}), and
    - particulate matter sized 2.5 microns or less ($PM_{2.5}$).

Primary standards set limits to protect public health, and secondary standards set limits to protect public welfare. The CAA also gives the authority to states to establish air quality rules and regulations stricter than the federal standards. California has adopted the NAAQS and developed their own more stringent California Ambient Air Quality Standards (CAAQS).

The General Conformity Provision of the CAA of 1970 (42 USC 7401 et seq.; 40 CFR Parts 5087) Section 176(c), including the USEPA's implementation mechanism, the General Conformity Rule (40 CFR Part 51, Subpart W), prohibits the Federal government from conducting, supporting, or approving any actions that do not conform to a USEPA-approved State Implementation Plan (SIP). A SIP is a state's self-authored blueprint for achieving and maintaining compliance with the goals of the CAA. Federal agencies prepare written Conformity Determinations for Federal actions in or affecting NAAQS non-attainment areas or maintenance areas when the total direct and indirect emissions of non-attainment pollutants (or their precursors) exceed specified thresholds. Conformity with the SIP is demonstrated if project emissions fall below threshold values.

Areas are designated as "attainment", "nonattainment", "maintenance", or "unclassified" with respect to the NAAQS. Regions in compliance with the standards are designated as "attainment" areas. In areas where the applicable NAAQS are not being met, a "nonattainment" status is designated. Areas that have been classified as "nonattainment" but are now in compliance can be re-designated "maintenance" status if the state completes an air quality planning process for the area. Areas for which no monitoring data is available are designated as "unclassified" and are by default considered to be in attainment of the NAAQS.

The WLAMC is located in the Northwest Coastal LA County Area within the Los Angeles County-South Coast Air Basin (SCAB). The SCAB is one of several regional air basin areas designated by California for the purpose of air quality management and air pollution control in Southern California. The SCAB district was created in 1969 and includes all of Orange County and the non-desert regions of Los Angeles County, Riverside County, and San Bernardino County. The SCAB covers approximately 17,100 square kilometers and includes much of the Greater Los Angeles

Area, which is home to approximately 18 million people. The South Coast Air Quality Management District (SCAQMD) is the air pollution agency responsible for regulating stationary sources of air pollution in the SCAB. Emission standards for mobile sources (automobiles, trucks, buses, railroads, airplanes and marine vessels) are established by the USEPA and the California Air Resources Board (CARB).

The current attainment status for all NAAQS criteria pollutants in the SCAB is as follows (from USEPA, 2018):

- 8-Hour Ozone
  - 2015 (0.070 ppm) – Non-attainment (extreme)
- Carbon Monoxide (CO)
  - 1-Hour (35 ppm) – Attainment (Maintenance)
  - 8-Hour (9 ppm) – Attainment (Maintenance)
- Nitrogen Dioxide (NO_2)
  - Annual (0.030 ppm) – Attainment (Maintenance)
- Sulfur Dioxide (SO_2)
  - 1-Hour (75 ppm) – Designation Pending
  - 24-Hour (0.14 ppm) – Unclassifiable/Attainment (attained 3/19/1979)
  - Annual (0.03 ppm) – Unclassifiable/Attainment (attained 3/19/1979)
- Particulate Matter 10 (PM10)
  - 24-Hour (150 $\mu g/m^3$) – Attainment (Maintenance)
- Particulate Matter 2.5 (PM2.5)
  - 2012 Annual (12 $\mu g/m^3$) – Non-attainment (Moderate)
- Lead
  - 3-Months Rolling (0.15 $\mu g/m^3$) – Non-attainment (Partial)

Although the PM10 is in attainment under the NAAQS, it is in non-attainment under the CAAQS for 24-hour (50 $\mu g/m^3$) and annual (20 $\mu g/m^3$) levels.

3.2.2.2 Hazardous Air Pollutants

Additionally, the CAA regulates criteria pollutants as well as 188 specifically listed hazardous air pollutants (HAPs). The Title V Operating Permit Program under 40 CFR 70 requires sources that meet the definition of a "major source" of criteria pollutants or HAPs to apply for and obtain a Title V operating permit. A major source of HAPs has the potential to emit (PTE) more than 10 tons per year (tpy) of any individual HAP, or 25 tpy of any combination of HAPs. The definition of major source for criteria pollutants is dependent on the air quality attainment status of the region where the source is located (i.e., areas that are in attainment or non-attainment with the NAAQS). Major sources have a PTE more than 100 tpy of any criteria pollutant in an attainment area or lower levels in various classifications of nonattainment (i.e. marginal, moderate, serious, severe, and extreme).

The WLAMC currently operates under a Title V Facility Permit (Facility Identification No. 14966) issued on by the SCAQMD on April 20, 2016. The operating equipment at the WLAMC covered under this permit includes three oil and natural-gas fired boilers in the Boiler Plant (Building 295), and several laundry tumblers and emergency electric diesel generators. The annual emissions (tons per year; tpy) of criteria pollutants from the WLAMC in 2017 (the most recent data available) are summarized below (from SCAQMD, 2018):

- Carbon Monoxide: 3.477 tpy
- Nitrogen Oxides: 6.789 tpy
- Particulate Matter: 2.173 tpy
- Sulfur Oxides: 0.066 tpy
- Volatile Organic Compounds:15.520 tpy

The WLAMC is currently in compliance with the permit conditions, though a notice of violation was issued on August 15, 2018, for failure to conduct 2nd quarter periodic monitoring tests for boilers rated greater than 5 million British Thermal Units (BTU)/hour.

The WLAMC is within a 1-mile radius of one other facility with a current Title V permit (as listed on the SCAQMD and USEPA ICIS-AIR database) (SCAQMD, 2018; NEPAssist, 2017). The Title V permit (No. 174544) identifies this facility as a crude petroleum and natural gas refinery operated by Breitburn Operating LP (Breitburn), 11100 Constitution Avenue, Los Angeles, CA. This facility is located on a 3.5 the north campus of the WLAMC. Breitburn leased the property under an agreement with the U.S. Bureau of Land Management since the 1960s, but is relocating its pipe storage off of this property to allow for NCA's Columbarium Expansion Project (to provide 90,000 niches for deceased veterans). Breitburn is currently in compliance with its Title V permit requirements (SCAQMD, 2018). Based on the predominant wind direction from west to east in Los Angeles (Western Regional Climate Center, 2018), emissions from the Breitburn facility would generally migrate to the east, away from the WLAMC, and would not be anticipated to cause a direct adverse impact on air quality at the WLAMC.

3.2.2.3 Greenhouse Gas Emissions

Gases that trap heat in the atmosphere are often called greenhouse gases (GHGs). Some greenhouse gases, such as carbon dioxide, occur naturally and are emitted to the atmosphere through natural processes and human activities. Other greenhouse gases (e.g. fluorinated gases) are created and emitted solely through human activities. The principal greenhouse gases that enter the atmosphere because of human activities are CO2, methane, nitrous oxide (N_2O), and fluorinated gases (e.g., hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride).

Gases in the atmosphere can contribute to the greenhouse effect both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forces occur when chemical transformations of the substance produce other greenhouse gases, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the earth. Other than USEPA requirements for Mandatory Reporting of Greenhouse Gases Rule (74 CFR 56260), which requires reporting of greenhouse gas data and other relevant information from large sources and suppliers in the United States, no general greenhouse gases regulatory guidelines are in place. The purpose of the rule is to collect accurate and timely GHG data to inform future policy decisions. Additionally, the GHG goals in the VA Strategic Sustainability Performance Plan (updated June 30, 2014) include reducing Scope 1 and Scope 2 GHG emissions by 29.8% by 2020, relative to Fiscal Year (FY) 2008, and reducing Scope 3 GHG emissions by 10% by 2020, relative to FY 2008.

3.2.2.4 USEPA National Emission Standards for Hazardous Air Pollutants and other Regulated Building Materials

Buildings 205, 207 and 208 are known to contain asbestos-containing building materials (VA, 2002). Asbestos is a carcinogen and is categorized as a hazardous air pollutant by the USEPA. Air toxics regulations under the CAA specify work practices for asbestos to be followed during demolitions and rehabilitations of all facilities, including, but not limited to, structures, installations, and buildings (excluding residential buildings that have four or fewer dwelling units). The regulations require a thorough inspection where the demolition or rehabilitation operation will occur. The regulations require the owner or the operator of the renovation or demolition operation to notify the appropriate delegated entity before demolition or renovations of buildings that contain a certain threshold amount of regulated asbestos-containing material.

The USEPA delegated to SCAQMD the authority to enforce the federal asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) and the SCAQMD is the local enforcement authority for asbestos. The SCAQMD Rule 1403 incorporates the requirements of the federal asbestos requirements found in found in NESHAP under 40 CFR Part 61, Subpart M. The SCAQMD Rule 1403 establishes survey requirements, notification actions, and work practice requirements to prevent asbestos emissions from emanating during building rehabilitation and demolition activities, waste packaging, transportation, and disposal.

NESHAP generally requires that asbestos-containing waste material be sealed in a leak-tight container while wet, labeled, and disposed of properly in a landfill qualified to receive asbestos waste. Landfills have special requirements for handling and securing the asbestos containing waste to prevent release of asbestos into the air. Transportation vehicles that move the waste from the point of generation to the asbestos landfill are required to have special labeling requirements and waste shipment recordkeeping requirements.

3.2.3 Existing Emissions Sources

Buildings 205, 207, and 208 do not have any regulated emissions sources.

3.2.4 Sensitive Receptors

CEQ NEPA regulations require evaluation of the degree to which the proposed action affects public health (40 CFR 1508.27). Children, elderly people, and people with illnesses are especially sensitive to the effects of air pollutants; therefore, hospitals, schools, convalescent facilities, and residential areas are considered to be sensitive receptors for air quality impacts, particularly when located within 1-mile from the emissions source.

Building 209 is the residence nearest to the Building 205 and 208 Project Study Area and houses formerly homeless and at-risk Veterans. Other nearby residential areas are located off-campus approximately 275 feet to the east of Building 208. These residences are physically and visually separated from the WLAMC by a forested area approximately 160-feet wide. There are seven schools within a 1-mile radius of the WLAMC north campus. The nearest school is the Brentwood School, which is located on the northern portion of the north campus, approximately 0.4 miles northwest of Buildings 205 and 208. There are six religious institutions within a 1-mile radius of the WLAMC north campus (NEPAssist, 2017). The nearest is the Village Church of Westwood, located approximately 0.4 miles north of the WLAMC. The nearest major medical building at the WLAMC is Building 500, which is located in the south campus approximately 0.6-miles south of Building 207.

3.2.5 Environmental Consequences

3.2.5.1 Proposed Action

Construction.

Airborne Particulate Emissions

The building rehabilitation activities would disturb building surfaces containing regulated building materials (e.g. asbestos, lead, PCBs). This disturbance could result in the release of these materials as particulates into the air.

Based on the distance between each building and the connection to the respective utility mains, it is anticipated that excavations within existing utility corridors would be performed over a total of approximately 12,000-linear feet, at width of approximately 4-6 feet, and at depths ranging from approximately 4-feet below grade (for electrical conduit) up to 8-feet below grade (for gravity-fed water and stormwater piping). The excavation would be completed in short segments, not over one continuous length, following the existing alignment of each specific and separate utility corridor. The anticipated area of disturbance is equal to approximately 1.6 acres (12,000-feet long by 6-feet wide = 72,000 square feet), and would require excavation through paved surfaces (roads, sidewalks) as well as grass-covered grounds.

Removing the ground cover would temporarily expose subsurface soils, which could then be subject to wind erosion, which could potentially create an air airborne dust nuisance.

Combustion Emissions

Construction activities associated with the Proposed Action would generate emissions of criteria pollutants from the operation of gas and/or diesel-fuel powered combustion engines associated with building rehabilitations, and from excavating existing utility corridors to install new electric, water, and sanitary sewer lines.

As previously described, the SCAB is in nonattainment for ozone, PM2.5, and lead. Therefore, since construction associated with the Proposed Action would result in the emission of these non-attainment air pollutants, a review has been conducted to determine if the Proposed Action is subject to the General Conformity Rule (GCR).

A federal action is exempt from the GCR requirements if the action's total net emissions are below the *de minimis* threshold or are otherwise exempt per 40 CFR 51.153. If net emissions exceed the *de minimis* value, or if a project is regionally significant, a formal conformity determination process must be followed.

To assess whether the Proposed Action construction emissions would exceed the *de minimis* levels, the estimated total suspended particulate emissions (associated with PM2.5) from the anticipated construction activities were calculated using the emission factors for heavy construction operations from "AP-42, Compilation for Air Pollutant Emission Factors" (USEPA, 1995). As previously described, the Proposed Action is likely to disturb or expose soil over an estimated total area of approximately 1.6 acres, during an approximately 24-month construction period. A conservative estimate of PM emissions is shown in Table 1.

Table 1. Estimate Total Suspended Particulate Emissions during Construction of the Proposed Action

Area to be Disturbed (acres)	Emission Factor (tons/acre/month)	Control Efficiency (%)	Total Suspended Particulate Emissions (tons)
1.6	80 lbs total suspended particulates/acre	80	0.026

Off-road construction vehicles would emit criteria pollutants during the approximately 24-month period for building rehabilitations and extension of utilities along the existing utility corridors. Criteria pollutant emissions from construction equipment were calculated assuming the use of typical construction equipment including a crane, excavator, forklift, paver, roller, and skid steer loader, operating for various durations during the different construction periods. Table 2 shows the anticipated non-road construction equipment and estimated operating duration.

Table 2. Estimated Hours of Operation for Non-Road Construction Equipment per Year

Equipment Type	Number	Hours/Day	Total Days	Total Hours
Trenching Along Existing Utility Corridors				
Crane	1	8	5	40
Excavator	1	8	30	240
Forklift	1	2	30	60
Paver	1	8	2	16
Roller	1	2	2	4
Building Rehabilitations				
Skid Steer Loader	3	4	150	180
Aerial Lift	3	8	150	360
Forklift	3	4	150	180

Table 3 presents the estimated average composite emission factor for each type of equipment previously listed in Table 2.

Table 3. Average Estimated Emission Factors

Equipment[(1)]	VOCs[(2)] (lbs/hr)	CO (lbs/hr)	NOx (lbs/hr)	SOx (lbs/hr)	PM[(3)] (lbs/hr)	CO_2 (lbs/hr)
Crane	0.0954	0.3982	0.7236	0.0014	0.0286	129
Excavator	0.0787	0.5140	0.4575	0.0013	0.0214	120
Forklift	0.0345	0.2166	0.1924	0.0006	0.0085	54.4
Aerial Lift	0.0288	0.1715	0.2002	0.0004	0.0104	34.7
Paver	0.1053	0.4966	0.5833	0.0009	0.0386	77.9
Roller	0.0632	0.3859	0.4127	0.0008	0.0261	67.0
Skid Steer Loaders	0.0236	0.2134	0.1700	0.0004	0.0061	30.3

Notes:
1 - Composite emission factors used; emission factors are for year 2019 (SCAQMD, 2018)
2 – VOCs based on reactive organic gases
3 – Combined $PM_{2.5}$ and PM_{10}

By multiplying the operating hours in Table 2 by the emissions factors in Table 3, the estimated emissions were calculated for non-road construction equipment associated with each major phase of construction for the Proposed Action, as shown in Table 4.

Table 4. Estimated Criteria Pollutant Emissions from Non-Road Construction Equipment

Equipment[1]	VOCs[2] (lbs)	CO (lbs)	NOx (lbs)	SOx (lbs)	PM[3] (lbs)	CO_2 (lbs)
Trenching Along Existing Utility Corridors						
Crane	3.816	15.928	28.944	0.056	1.144	5,160
Excavator	18.888	123.36	109.8	0.312	5.136	28,800
Forklift	2.07	12.996	11.544	0.036	0.51	3,264
Paver	1.6848	7.9456	9.3328	0.0144	0.6176	1,246
Roller	0.2528	1.5436	1.6508	0.0032	0.1044	268
Building Rehabilitations						
Aerial Lift	10.368	61.74	72.072	0.144	3.744	12,492
Skid Steer Loaders	4.248	38.412	30.6	0.072	1.098	5,454
Forklift	8.28	51.984	46.176	0.144	2.04	13,056
Total Pounds/year	49.6076	313.9092	310.1196	0.7816	14.394	69,740
Total Tons/year	0.024804	0.156955	0.15506	0.000391	0.007197	34.8702

Notes:
1 – Data from Table 1.
2 – VOCs based on reactive organic gases
3 – Combined $PM_{2.5}$ and PM_{10}

In addition to non-road construction equipment, on-road construction equipment (e.g., material haul trucks) would be utilized during construction of the Proposed Action. For this EA, a total of 30 on-road truck trips, each totaling 50 miles, served as the basis for estimating on-road vehicle emissions. The estimated on-road vehicle emissions were calculated by multiplying the estimated number of on-road trucks (30) and distance by their estimated emission factors (USAF, 2013). Table 5 presents the estimated emissions for these on-road vehicles.

Table 5. Estimated On-Road Haul Truck Emissions for Construction of the Proposed Action

Pollutant	VOC	CO	NOx	SO_2	PM_{10}	$PM_{2.5}$	CO_2
Emissions factor grams/mile[1]	0.325	0.832	2.817	0.012	0.110	0.083	1243.90
Emissions (lbs) for 30 trucks making a 50-mile round trip	1.1	2.8	9.3	0.04	0.36	0.27	4,113
Emissions, tons	0.00054	0.0014	0.005	0.00002	0.00018	0.00014	2.06

Notes:
1 - Emissions factors for all pollutants for Heavy Duty Diesel Vehicle Average Emission Factors (in USAF, 2013).

A summary of the estimated total annual emissions of criteria pollutants associated with construction of the Proposed Action is presented in Table 6.

Table 6. Sum of Estimated Total Emissions of Criteria Pollutants during Construction

Criteria Pollutant	VOC[3]	CO	NOx	SOx	PM[4]
Off-Road Emissions (tons/year)[1]	0.024804	0.156955	0.15506	0.000391	0.007197
On-Road Emissions (tons/year)[2]	0.00054	0.0014	0.005	0.00002	0.00032
Total Emissions (tons/year)	0.025	0.16	0.16	0.0004	0.007
General Conformity *de minimis* threshold (tons/year)	50	100	100	100	100

Notes:
1 – From Table 4
2 – From Table 5
3 – VOCs based on reactive organic gases
4 – Combined $PM_{2.5}$ and PM_{10}

As shown in Table 6, the estimated total annual emissions for construction of the Proposed Action would be below the GCR *de minimis* thresholds.

Additionally, the Proposed Action incorporates activity- and material-specific BMPs to limit the emissions of criteria pollutants from engines, control airborne dust, and avoid the release of dust that may be laden with regulated building materials. Implementing these BMPs would minimize the potential for creating adverse impacts on air quality. These BMPs are presented in the following list:

- Prior to performing rehabilitation activities that may disturb asbestos-containing building materials (based on an asbestos survey completed by a Cal/OSHA certified asbestos consultant), the construction contractors would complete the SCAQMD registration and notification required under Rule 1403. All asbestos-containing materials that may be disturbed would either be avoided or abated by a Cal/OSHA licensed abatement contractor. This management approach would limit potential asbestos emissions from building rehabilitation activities. Additionally, prior to disturbance of building materials containing PCBs or lead-based paint, complete abatement and/or encapsulation according to all applicable federal, state, and local regulations. Only licensed contractors would perform these activities.
- Although emissions from gaseous and liquid-fueled engines rated below 50 brake horsepower (bhp) used during construction are considered *de minimis* emission sources, to the extent practicable, use newer off-road and on-road construction equipment that meets the latest USEPA or CARB standards.
- Reduce nitrogen oxides, volatile organic compounds (VOCs), and CO from engines rated over 50 bhp by complying with SCAQMD Rule 1110.2 (“Emissions from Gaseous- and Liquid-Fueled Engines”).
- Limit the idling of mobile emission sources to three minutes; after three minutes turn engines off.
- Cover beds of all incoming and outgoing haul trucks with tarps.
- Visually monitor all construction activities on a daily basis, and particularly during extended periods of dry weather; implement additional dust control measures as needed

- Implement dust suppression methods identified in the VA's Specification 01 57 19: Temporary Environmental Controls, and in the SCAQMD Fugitive Dust Mitigation Measures, Tables XI-A through XI-E. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspension of dust-generating activities during sustained high wind conditions (e.g. 10-40 mph with gusts at or above 50 mph).
- Maintain speed of construction vehicles on paved roads within the WLAMC and the vicinity at posted limits. This would minimize dust generated by vehicles and equipment on paved surfaces. On any unpaved surfaces at each construction area, vehicle speeds will be maintained at or below 5 mph to prevent dust generation of exposed soil.
- Stabilize exposed soil with vegetation or mulching to minimize erosion and dust generation.

Therefore, construction would have a short-term, direct, less-than-significant adverse impact on air quality.

Operation. Under the Proposed Action Buildings 205, 207, and 208 would no longer require the use of the current steam utility service provided by the WLAMC central steam plant in Building 295. This would result in a minor decrease in the amount of natural gas consumed—and the amount of emissions released—associated with generating this steam. The emergency electric generators at Building 205 and 207, which are 21 and 32 years old, respectively, would either remain or be replaced with newer, more energy-efficient models. No regulated air emissions sources would be required to operate the Proposed Action.

Negligible quantities of regulated emission would be generated from gasoline-powered maintenance equipment associated with mowing/landscaping, trash removal, and minor maintenance activities at each building. These operational emissions would be below the *de minimis* thresholds.

In summary, emissions of criteria air pollutants generated during construction and operation of the Proposed Action would be emitted at rates less than *de minimis* thresholds. Therefore, the Proposed Action would have a short-term, direct, less-than-significant adverse impact on air quality. Furthermore, the Proposed Action would be exempt from the GCR requirement to prepare a full Conformity Determination, and a detailed analysis of emissions is not warranted for this EA.

3.2.5.2 No Action

Under the No Action alternative, current *de minimis* emissions associated with routine maintenance to Buildings 205, 207, and 208 (e.g. landscaping) would continue. No short- or long-term changes in emissions quantities or types are anticipated to occur. Therefore, under the No Action alternative, current baseline air emissions would continue unchanged for the foreseeable future.

3.3 Cultural Resources

3.3.1 Existing Environment

The WLA VA Historic District (National Register Information System Reference No. 14000926) was listed in the National Register of Historic Places (NRHP) in 2014 (U.S. Department of the Interior [DOI], 2014). Two WLAMC buildings also are listed individually in the National Register

of Historic Places (Building 20- Wadsworth Chapel and Building 66- Streetcar Depot). The WLA VA Historic District is significant under Criterion A for its association with Second Generation Veterans Hospital national context and as a representation of the nation's care for Veterans. The WLA VA Historic District is also significant for its Mission Revival architecture under Criterion C. The established Period of Significance for the WLA VA Historic District is 1923-1952. The Los Angles National Cemetery is a contributing element to the historic district and is individually eligible for listing in the National Register of Historic Places. Integrating landscapes, open spaces, and streetscapes to create a pastoral environment, the historic district conveys a strong sense of time and place from its period of significance. Encompassing approximately 400 acres, including the National Cemetery, the historic district includes 64 contributing resources, including Buildings 205, 207 and 208, and 44 non-contributing resources.

The NRHP Registration Form indicates that Building 205 was built in 1937 to provide mental outpatient psychiatry services, Building 207 was built in 1940 as a hospital building, and Building 208 was built in 1945 to provide health and vocational rehabilitation services (U.S. DOI, 2014).

Building 205 is described in the NRHP Record as an H-shaped building designed with elements of Mission Revival style that was constructed of reinforced concrete (U.S. DOI, 2014). The building has a smooth stucco exterior and a terra cotta tile cross gable roof. The building is three-stories high with a basement level partially below grade. The interior walls and ceilings finishes include a mix of drywall, plaster, and concrete walls with drop-in ceiling panels and tiles (Millennium Consulting Associates, 2017). The HVAC system includes a forced-air system with three air-handling units located on the eastern exterior of the building; air conditioning window units are also located throughout the building. In addition, there is an enclosed passageway that leads to Building 208.

Building 208 is described in the NRHP Record as an H-shaped building designed with elements of Mission Revival style that was constructed of reinforced concrete (U.S. DOI, 2014). The building has a smooth stucco exterior and a terra cotta tile cross gable roof. The building is three-stories high with a basement level partially below grade. The interior wall and ceiling finishes include a mix of drywall and plaster walls with drop-in ceiling panels and tiles (Millennium Consulting Associates, 2017). The HVAC system includes a forced air system with four air handling units located on the northern exterior of the building; air conditioning window units are also located throughout the building. Enclosed passageways lead from the basement level to Buildings 205 and 209.

Building 207 is described in the NRHP Record as generally H-shaped and designed with elements of Mission Revival style (U.S. DOI, 2014). It is three stories high with its lowest (basement) level partially below grade. Constructed of reinforced concrete, the building is clad in smooth stucco with a cross gable roof capped with terra cotta tile. Windows are regularly spaced on each elevation and consist of aluminum single hung sash. The main entrance is centrally located in the south elevation and accessed by a flight of stairs. A secondary entrance is located at the north elevation. Enclosed patios are located on south and east elevations.

The VA previously consulted with the California SHPO, as required by 54 U.S.C. 306108, also known as Section 106 of the NHPA, on the proposed seismic upgrades and associated rehabilitations to Buildings 205 and 208. Section 106 requires federal agencies to review the effects of their projects on historic properties; consult with members of the public, including the SHPO and Native American Tribes; develop measures to avoid, minimize, and mitigate adverse

effects to historic properties; and allow the Advisory Council on Historic Preservation an opportunity to comment. The Criteria for Adverse Effect (36 CFR 800.5) defines an "adverse effect" as:

1. Physical destruction of or damage to all or part of the property;
2. Alternation of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access that is not consistent with the Secretary's *Standards for the Treatment of Historic Properties* (36 CFR 68) and applicable guidelines;
3. Neglect of a property which causes its deterioration.

The SOI *Standards for Rehabilitation* (*SOI Standards*) can be applied to the rehabilitation of any historic building. The *SOI Standards* provide guidance for the rehabilitation of the building while preserving the essential historic features that make the building significant. Projects conducted in accordance with the *SOI Standards* and in consultation with the SHPO do not constitute an adverse effect under Section 106. On February 18, 2015, the SHPO concurred with the VA's determination that the historic qualities of Buildings 205 and 208 would not be adversely affected by rehabilitation and use as therapeutic housing for homeless veterans (Castle-Rose, 2015).

VA continues to consult with the SHPO concerning plans for Buildings 205 and 208 to ensure the *SOI Standards* are met. VA will take into account comments from SHPO to ensure the design meets the *SOI Standards*.

The VA previously consulted with SHPO about proposed seismic upgrades to Building 207. At present, plans have not been developed for the rehabilitation of this building. VA intends to award the EUL to a developer who will rehabilitate Building 207 in accordance with the *SOI Standards* and in consultation with the SHPO. If these conditions are met, the project will not adversely affect historic properties. If the VA, in coordination with the developer, determines that application of the *SOI Standards* is not suitable for rehabilitationrehabilitation of Building 207 or if a suitable developer who is willing to commit to the *SOI Standards* cannot be identified, VA will reopen consultation with the SHPO and other parties to determine methods to avoid, minimize, and/or mitigate any adverse effects of the rehabilitation of Building 207, in accordance with Section 106 of the NHPA and its implementing guidance at 36 CFR §800.

VA finalized an archaeological sensitivity model in 2018 through consultation with SHPO and Native American tribal organizations to identify potential deposits on the WLA Campus. Based on field conditions, the study determined that the area around Buildings 205, 208, and 207 has a low sensitivity for archaeological resources. In accordance with the model, VA will provide spot-checked, or intermittent monitoring, or limited buried site testing (BST) by an archaeologist under the direct supervision of an archaeologist meeting the *SOI Professional Qualification Standards*.

3.3.2 Environmental Consequences

The analysis considers potential effects to cultural resources located in and within view of the Proposed Action site.

3.3.2.1 Proposed Action

Rehabilitation of Buildings 205, 207, and 208 would result in temporary effects to the setting of these buildings and surrounding historic buildings due to increased noise and visible construction

materials such as scaffolding, fencing, and trucks. These effects will be temporary in nature and will be minimized to the extent feasible. The temporary effects will not require removal of the buildings from the historic district or affect the historic character of the overall historic district. Construction will be largely limited to building footprints; no additions are planned for Buildings 205, 207, and 208 that would disrupt or otherwise affect potential archaeological properties within the respective project areas. In the event that a previously unidentified archaeological resource is discovered during the ground disturbing activities by the monitors, the VA will halt all construction work involving subsurface disturbance with 15 feet of the resource and proceed in accordance with 36 CFR §800.13(b).

If human remains are identified during construction, the VA shall proceed with reference to State Health and Safety Code Section 7050.5 states and Public Resources Code Section 5097.98. The VA shall notify the Los Angeles County Coroner of the find immediately. If the remains are determined to be Native American and outside the jurisdiction of the Los Angeles County Coroner's office, the VA shall comply with the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA). The VA shall develop a plan of action in consultation with Native American tribal organizations with cultural and/or geographic affiliation to the WLAMC area (43 CFR 10).

Under the Proposed Action, Buildings 205, 207, and 208 would be rehabilitated according to the *SOI Standards*; proceeding with the *SOI Standards* for rehabilitation of a historic building does not qualify as an adverse effect to the buildings or surrounding properties. Therefore, following completion of the construction phase, the Proposed Action would not, directly or indirectly, adversely affect any of the characteristics that qualify a property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

As a result of the Proposed Action, Buildings 205, 207, and 208 would be physically improved and strengthened, thereby increasing the longevity of use and maintaining integrity of the historic district. Accordingly, the Proposed Action would have a long-term, significant beneficial impact on cultural resources.

3.3.2.2 No Action

Under the No Action alternative, Buildings 205, 207, and 208 would not be upgraded, or rehabilitated, or renovated, and the temporary construction impacts (scaffolding disrupting views of the buildings) associated with the construction phase of the Proposed Action would not occur. However, without undergoing the improvements associated with the Proposed Action, the buildings would continue to deteriorate and potentially detract from the historic district. Additionally, the buildings may not be able to withstand potentially damaging effects of a seismic event. Accordingly, the No Action alternative would have a long-term, significant adverse impact on cultural resources.

3.4 Geology, Topography, and Soils

3.4.1 Existing Environment

3.4.1.1 Geology

Regional geology information was obtained from the Geologic Map of the Beverly Hills and Van Nuys (South ½) Quadrangle, Los Angeles, California (Dibblee, Jr., 1991). The geology underlying the WLAMC is classified as older surficial sediment from the late Pleistocene age, of the Cenozoic era (Dibblee, Jr., 1991). This geology consists of slightly consolidated older alluvium of gray and light brown pebble-gravel, sand, silt and clay derived from the Santa Monica Mountains (Dibblee, Jr., 1991).

There are no exposed bedrock outcrops at the Project Study Areas. Depth to bedrock is more than 80 inches below the ground surface (USDA-NRCS, 2017).

Seismic Condition Assessment

The Project Study Areas are north of the Santa Monica fault. However, as shown on Figure 6 (taken from the Draft Master Plan), the Santa Monica fault runs through the southernmost portion of the WLAMC (USGS, 2001).

The Project Study Areas are also located outside of the California seismic Hazards Program: Alquist-Priolo Fault Traces and Hazard Zones, and Landslide Zones (California Geological Survey, 2018). While the Building 205 and 208 and 207 Project Study Areas are outside of the Seismic Hazards Program Liquefaction Zones, the portion of the WLAMC generally east of Bonsall Avenue is located within the Liquefaction Zone (California Geological Survey, 2018). Liquefaction is a phenomenon that occurs when saturated, loose granular soils lose strength due to cyclic (seismic) loads. Liquefaction hazards generally occur in unconsolidated sandy alluvium that is below the water table and within 50 feet from ground surface. Because groundwater is reportedly greater than 70 feet below the ground surface at the WLAMC, the liquefaction potential of these soils would be relatively limited.

According to WLAMC staff, there have been no notable seismic events since 1940 at the WLAMC campus (VA, 2017b). However, the San Fernando Earthquake of 1971 affected buildings at the WLAMC and necessitated demolition of the Wadsworth Hospital. Building 500 was designed to be "earthquake-proof" directly in response to the 1971 quake. The most recent seismic event that was slightly felt by staff at the WLAMC occurred in 2007 and was described by staff as a moderate earthquake of short duration “somewhere north” of the Project Study Areas (VA, 2017b).

As part of a qualitative assessment of the physical conditions of all buildings at the WLAMC, Buildings 205, 208, and 207 received a “poor” value, indicating the buildings were “in significant disrepair requiring immediate assessment and attention (VA, 2016a). Inadequacies relating to seismic integrity or life safety systems automatically caused a building to receive a “poor” value as these issues require immediate consideration for future inhabitation of the building” (VA, 2016a). It is noted that Building 209, which recently underwent seismic upgrades and rehabilitations and is now used as housing for homeless veterans, received a “good” rating value, indicating it is “in near ideal condition and requires the least amount of attention at the present time” (VA, 2016a).

Seismic Design Requirements

According to the USGS earthquake hazard program, the WLAMC location is within a "Seismic Design Category E" area (USGS, 2018). Accordingly, buildings in this area should be constructed according to Category E standards. Buildings in this area are further classified by their use: domiciliary uses are considered to be "Essential Facilities" that must remain in operation after an earthquake with only minor repairs to be made.

The VA Office of Construction and Facilities Management (OCFM) issued seismic design requirements (Document H-18-8, dated October 1, 2016) for all VA facilities including those of the Veterans Health Administration, Veterans Benefits Administration, and the National Cemetery Administration (VA, 2016). Under H-18-8, West Los Angeles is identified as having "very high" seismicity ($S_s \geq 1.250g$; $S_1 \geq 0.500g$) and therefore would require eligible buildings to undergo a specified level of seismic retrofit based on the intended use of the building (VA, 2016).

Under the City of Los Angeles Ordinance 183893, seismic retrofit is required for pre-1978 wood-frame soft-story buildings and non-ductile concrete buildings (City of Los Angeles Department of Building and Safety [LADBS], 2018). Buildings that are within the scope of this ordinance and require retrofitting are concrete buildings with a roof and/or floor supported by a concrete wall or concrete column, constructed before January 13, 1977. The goal of the mandatory retrofit programs, under the ordinance, is to reduce these structural deficiencies and improve the performance of these buildings during earthquakes. Without proper strengthening, these vulnerable buildings may be subjected to structural failure during and/or after an earthquake. The poor performance of these older concrete buildings is due to deficiencies in the lateral force-resisting system that render the building incapable of sustaining gravity loads when the building is subjected to an earthquake (LADBS, 2018).

3.4.1.2 Topography

Based on the United States Geological Survey (USGS) 7.5-Minute Series Beverly Hills, California Topographic Quadrangle Map, dated 2018, the WLAMC north campus is on a gently sloping terrace at the foot of the Santa Monica Mountains (USGS, 2018). The WLAMC north campus generally slopes to the south and westerly from Bonsall Avenue to Bringham Avenue, as depicted in the topography map presented in Figure 7.

The ground surface elevation is approximately 425-440 feet amsl at Buildings 205 and 208 (USGS, 2012). This Project Study Area is at a slightly higher elevation than the grounds to the west, south, and east, and generally slopes to the southeast and southwest.

The ground surface elevation is approximately 410-415 feet amsl at Building 207 (USGS, 2012). This Project Study Area generally slopes from north to south. The east side of the Project Study Area has a minor slope to the east toward Bonsall Avenue.

A bluff is located on the eastern side of the WLAMC. The bluff runs in a north south direction behind buildings 210, 209, 208 and 259. The ground slopes downward by approximately 60 feet to the east border of the WLAMC by the Brentwood/Westwood neighborhoods. The western border of the WLAMC and the bluff located on the eastern border, the land between these features acts as a plateau. The two topographic features are natural barriers that help create a protective area for housing and community development (VA, 2016a).

Figure 6. Earthquake Faults at the WLAMC

Figure 7. Topography Map of the WLAMC and Project Study Areas

3.4.1.3 Soils

Soil information was obtained from the United States Department of Agriculture – Natural Resources Conservation Service (USDA-NRCS). The predominant soil type at the WLAMC north campus, including at both Project Study Areas and existing utility corridors, is classified as "Urban land-Sepulveda-Pierview complex, 2 to 12 percent slopes" (USDA-NRCS, 2017). This soil is comprised of a well-drained clay loam to a sandy clay loam, and is not classified as prime farmland (Figure 8) (USDA-NRCS, 2017).

The soils at the Project Study Areas are currently covered with either vegetation (landscaped grasses, shrubs, trees), buildings, paved parking areas, and concrete paths.

3.4.2 Environmental Consequences

3.4.2.1 Proposed Action

Geology

Construction and Operation. Construction and operation of the Proposed Action would not require contacting or exposing the bedrock underlying or in vicinity of either Project Study Area or utility corridors. Additionally, the construction activities do not cross a known seismic fault line and would not have any mechanisms, such as bedrock fracturing, fluid injections, or blasting, to directly or indirectly cause an increase in seismic activity. Therefore, the Proposed Action would have no impact on geological resources or lead to seismic events.

The Proposed Action would include seismic retrofit upgrades at each building according to the LADBS Ordinance 183893 (LADBS, 2018). These upgrades would increase the ability of each building to better withstand a potential seismic event without sustaining major structural damage. Therefore, the Proposed Action would have a long-term, significant beneficial impact in context to increasing the buildings structural integrity.

Topography

Construction and Operation. Construction and operational activities associated with the Proposed Action would not require any substantial modifications to the existing topography at or in vicinity of the Project Study Areas and utility corridors. Any changes to the existing grade caused by construction activities would be corrected and returned to the original grade by the end of the construction phase. Therefore, the Proposed Action would have no impact on topography.

Soils

Construction. Construction activities would require excavating subsurface soils along selected existing utility corridors (electric, water, sanitary sewer). These soils have already been compacted and disturbed during the original subsurface utility installations and are predominantly covered by hardscape (asphalt, concrete), with some areas covered with grass. Excavation would generally be required along approximately 12,000-linear feet of existing utility corridors, at a width of 4-6 feet, and at depths ranging from 4- to 8-feet below grade (with the deeper excavations required for gravity-fed potable water piping). Utility corridor excavations would only remain open only while a short segment of piping or conduit is being installed. Soil excavated from each segment of the utility corridor would either be containerized (placed in a dump truck bed) or stockpiled and covered with a tarp adjacent to the excavation. Immediately following installation of the new

Figure 8. USDA-NRCS Soil Map

utility corridor would either be containerized (placed in a dump truck bed) or stockpiled and covered with a tarp adjacent to the excavation. Immediately following installation of the new utility line, the soil would be used to backfill the excavation, and the exposed soil would be repaved or reseeded, similar to its prior condition. This would minimize the time that excavated soils are exposed during the utility corridor construction activities.

During rehabilitations of the buildings, construction equipment (wheeled lifts, skid steers) may be required to drive over the grass-covered grounds immediately surrounding each building. These vehicles could remove vegetative cover and compact the underlying soils, reducing the soils infiltration rate. This can lead to increased soil erosion by wind or by stormwater runoff, leading to off-site discharges of sediment-laden runoff.

To minimize potential impacts to soil quality, the construction contractors would develop a soil erosion and sediment control (SESC) plan for VA review and approval prior to conducting any work. The SESC plan would specify the BMPs to be implemented to minimize and correct any soil impacts. These BMPs would also be consistent with the VA's *Specification 01 57 19: Temporary Environmental Controls*, and would include the following measures at a minimum:

- Install and maintain sedimentation and erosion control measures, including silt fences and water breaks, detention basins, filter fences, sediment berms, interceptor ditches, synthetic hay bales, rip-rap, and/or similar physical control structures.
- Retain on-site vegetation to the maximum extent possible.
- Revegetate disturbed areas as soon as construction is completed. Use native, non-invasive vegetation. Professionally maintain vegetation during operation.

Additionally, the construction contractors would implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the Project Study Areas, to reduce the impacts of incidental releases of construction vehicle fluids (diesel, hydraulic fluids, etc.) to soil quality. The construction contractors would be required to report releases of regulated quantities of petroleum-based fluids to the VA and California Environmental Protection Agency, and be responsible for performing cleanup according to applicable regulatory requirements.

These measures would ensure that the Proposed Action construction activities would have a short-term, direct, less-than-significant adverse impact on soil quality.

Operation. Operation of the Proposed Action would include scheduled routine landscaping to ensure that any soil exposed during construction is revegetated and stabilized to prevent erosion. The Proposed Action would have no other mechanisms that would require excavation or exposure of soil. Therefore, operation of the Proposed Action would have no impact on soil quality.

3.4.2.2 No Action

Under the No Action alternative, no changes to current conditions at the Project Study Areas would occur. Seismic upgrades would not be made to Buildings 205, 207, and 208. Therefore, the No Action alternative would have a long-term, significant adverse impact in context to the buildings' resiliency to a seismic event. The No Action alternative would have no impact on other geological conditions, topography, or soil quality. Baseline conditions would remain, as described above.

3.5 Hydrology and Water Quality

This section covers the effects on hydrology, including surface water, stormwater, and groundwater. A discussion of wetlands and floodplains is presented in Section 3.9.

3.5.1 Existing Environment

3.5.1.1 Surface Water

There are no surface waters at the Project Study Areas, and no intermittent streams or perennial surface water bodies at the WLAMC. The nearest intermittent surface water body is associated with a presumed 0.5-acre wetland in the southernmost portion of an arroyo (a steeply-sided gully cut by running water), which is located along the western boundary of the north campus. The arroyo is approximately 450-feet west of the Project Study Areas and separated from it by natural and built features including Patton Avenue, a solar-covered parking lot (Parking Lot 38), and undeveloped land. The arroyo eventually drains into a Los Angeles County 7-by 7-foot reinforced concrete box (RCB) structure that continues south under Bringham Avenue (VA, 2017a).

It is noted that the current 2018 USGS topographic map no longer depicts an intermittent blue line stream channel on the north campus of the WLAMC that had been shown on USGS maps from 1995 and older (USGS, 2018; USGS 1995). These older USGS topographic maps depicted the channel as originating near the southwestern portion of the Getty Museum (located approximately 1-mile northwest of the WLAMC), extending south through densely populated residential areas, then entering the WLAMC and draining into the arroyo. Development of the north campus in 1996 filled the drainage channel north of the arroyo. A site survey in 2017 confirmed that this area has minimal streamflow and hydrology. Additional discussions of the arroyo and wetland features are provided under the Wetland heading in Section 3.6.1.

3.5.1.2 Stormwater

Stormwater is defined by USEPA as the runoff generated when precipitation from rain events flows over land or impervious surfaces without percolating into the ground.

Stormwater is an important component of surface water systems because of its potential to introduce sediments and other contaminants that could degrade lakes, rivers, and streams. Stormwater flows, which can be exacerbated by high proportions of impervious surfaces associated with buildings, roads, and parking lots, are important to the management of surface water. Stormwater management systems provide the benefit of reducing sediments and other contaminants that would otherwise flow directly into surface waters.

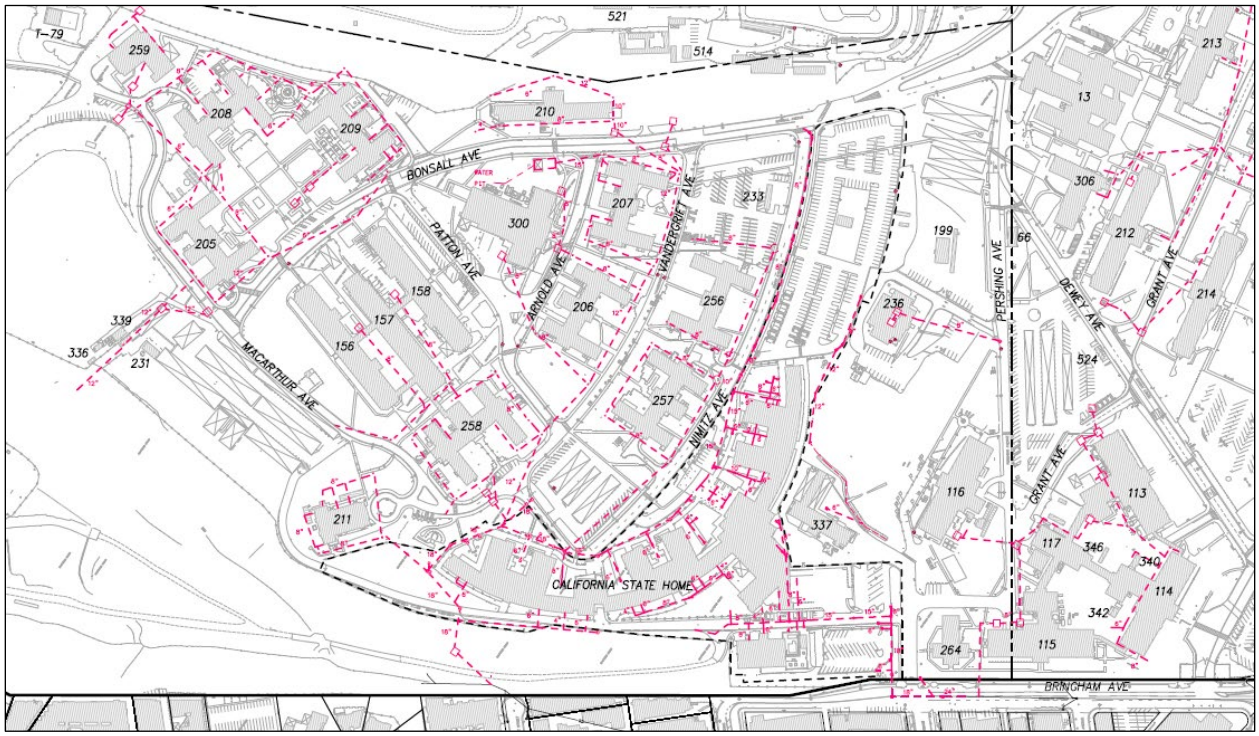
Within the WLAMC, impervious surfaces cover approximately 151 acres (39 percent) of the grounds. Stormwater generated within the north campus is conveyed into a storm drain system that includes several dozen catch basins. This storm drain system is over 80 years old, and in some areas, over 95 years old (VA, 2017a). All systems are either part of the original WLAMC construction or were part of a phased-in site development. However, a physical inspection of the stormwater network determined that its general condition was good (VA, 2018). Specific details about the storm drain network associated with the Project Study Areas is presented in the following subsections.

The existing storm drain system within the north campus consists of several separate drainage areas and systems (Figure 9). The majority of the site slopes in the southwest direction, either into the Arroyo Open Channel, which discharges south into the RCB structure under Bringham Avenue

(VA, 2017a). For the middle and southwestern portions of the north campus (west of Bonsall Avenue), the storm drain network flows toward the southwestern corner of Wilshire Boulevard and San Vicente Boulevard, across Wilshire Boulevard, continuing through the south campus (VA, 2017a).

The south campus consists of two main systems. One enters the site from the north campus at Wilshire Blvd and Bonsall Ave and flows in the southwest direction to a 42" pipe owned by the Los Angeles County Flood Control District (LACFCD) directly west of the campus. The east portion of the south campus flows south and connects to a LACFCD owned 42" RCP along Ohio Avenue at Sawtelle Avenue. Both systems are eventually tributary to Ballona Creek and discharge into the Pacific Ocean at Marina Del Ray. In addition to these two main systems, a small tributary area in the southwest portion of the south campus drains south to a 12" RCP that joins the LACFCD 42" RCP along Ohio Avenue (VA, 2017a).

Figure 9. Stormwater Drain Network in the WLAMC North Campus



(From VA 2017a)

Buildings 205 and 208

Overland stormwater originating at the Building 205 and 208 Project Study Area is directed toward two catch basins northeast of Building 208, and three catch basins located within the common area shared by Buildings 205, 208, and 209 (VA, 2017a). Rainfall on the building roofs is conveyed into gutters and interconnecting 16 subsurface storm drain laterals which tie to the north campus storm sewer network (VA, 2017a). The catch basins and laterals connect to the storm drain network which discharges to the undeveloped and pervious grass- and shrub-covered field to the west of Building 336 and MacArthur Field, as depicted in Figure 9. This stormwater discharge point is located approximately 420-feet north of the arroyo and separated from it by pervious soils. Given this distance; the stormwater is not anticipated to reach the arroyo wetland.

The estimated peak storm demand load on the stormwater sewer network is 332 gallons per minute (GPM) for Building 205, and 379 GPM for Building 208. The existing storm drain network in this portion of the north campus has sufficient capacity to support this volume (VA, 2018).

Building 207

Overland stormwater is directed toward a catch basin near the southwestern corner of the building, on Vandergrift Avenue. Rainfall on the roof is conveyed into exterior gutters and downspouts, which connect to laterals that drain into an 18-inch diameter main beneath Vandergrift Avenue, which extends west beneath Vandergrift Avenue, then connects to the off-site storm drain network owned by the LA County Flood Control District (VA, 2018). The building's estimated peak storm demand load imposition on the sewer network is 339 GPM (VA, 2017a). The storm drain network has sufficient capacity to support this volume (VA, 2018).

Regulatory Conditions

National Pollutant Discharge Elimination System

Section 402 of the Clean Water Act established the National Pollutant Discharge Elimination System (NPDES) program to limit pollutant discharges into streams, rivers, and bays. In California, the State Water Resources Control Board (SWRCB) and its nine Regional Boards oversee implementation of the Clean Water Act and the NPDES program. In California, NPDES permits are also referred to as waste discharge requirements (WDRs), which regulate discharges to waters of the United States.

The Los Angeles Regional Water Quality Control Board (LARWQCB) regulates discharges from medium and large municipal separate storm sewer systems (MS4s) through the Los Angeles County, Long Beach, and Ventura County MS4 Permits. These permits are issued under the NPDES Program.

The WLAMC operates under a Phase II Small MS4 General Permit (No. CAS0000004; issued August 10, 2017). The permit allows for stormwater collected throughout the campus to discharge to the LACDPW-owned drain lines that extend beyond the WLAMC. According to the WLAMC GEMS Coordinator, the MS4 permit is currently in the process of being updated to identify potential "hotspot" areas that could degrade stormwater quality before being discharged offsite, as well as identifying areas that have the potential to generate substantial amounts of trash (physical debris) that could enter the stormwater management system (Mabbett, 2018b).

Construction General Permit/ Storm Water Pollution Prevention Plan (SWPPP)

Construction projects that disturb one (1) or more acres of soil, or less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activities Storm Water General Permit (2009-0009-DWQ) (Construction General Permit [CGP]).

Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling, or excavation, but exempts regular maintenance activities performed to restore the original line, grade, or capacity of a facility. The CGP requires the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer (QSD). The SWPPP is a document that outlines how a construction project will minimize sediment and other pollutants in stormwater runoff commonly associated with construction

activities. The project-specific CGP and SWPPP would be responsibility of the private entity.

The Proposed Action is anticipated to disturb approximately 1.6 acres of soil (primarily associated with excavations along the existing electric, potable water, and sanitary sewer utility corridors). Therefore, a CGP would be required. However, should the private entities' design engineers revise the projects such that less than one acre of soil is disturbed, then a CGP would not be required.

EISA Section 438

Under the Energy Independence and Security Action (EISA), Section 438, "The sponsor of any development or rehabilitation project involving a federal facility with a footprint that exceeds 5,000 square feet shall use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the prehabilitation hydrology of the property with regard to the temperature, rate, volume, and duration of flow." This regulatory requirement pertains to protecting surface water through the management of stormwater runoff volume and quality. For this Proposed Action, the VA WLAMC would be considered the project sponsor. However, the private entities performing the rehabilitation can be directed to demonstrate compliance with EISA 438 on behalf of the VA.

3.5.1.3 Groundwater

The WLAMC is located within the Ballona Creek Watershed (City of Los Angeles Department of Public Works, 2017). Groundwater flows throughout the WLAMC and regionally is anticipated to flow toward the southeast. Actual groundwater flow direction underlying the Project Study Areas may vary due to the presence of underground utility corridors and heterogeneous subsurface soil conditions. Groundwater has not been encountered at the WLAMC at depths within 70 feet of the ground surface (VA, 2016a).

3.5.2 Environmental Consequences

3.5.2.1 Proposed Action

Surface Water

Construction and Operation. As previously described, there are no surface water bodies at the Project Study Areas. The nearest surface water body is the intermittently ponded area within the arroyo, which is located approximately 450-feet from the Project Study Areas. The construction and operational activities associated with the Proposed Action have no mechanisms that would directly impact this surface water body.

Potential indirect impacts could occur if construction within the Building 205 and 208 Project Study Areas or utility corridors resulted in substantial soil erosion and sedimentation of run-off into the northern stormwater drainage network that discharges to the open area and eventually to the arroyo. This potential impact would be minimized by implementing the SESC BMPs previously described for Soil in Section 3.4.2.1, as well as the CGP SWPPP BMPs to further reduce potential sedimentation of runoff.

Therefore, construction and operation of the Proposed Action would have a short-term, negligible, less-than-significant adverse impact on surface water quality.

Stormwater

Construction. Construction of the Proposed Action would disturb approximately 1.6-acres of soil. As such, the private entities' contractors would be required to obtain a CGP and submit a Notice of Intent at least seven days prior to that start of construction of the Proposed Action. The CGP would require development of a site-specific SWPPP that specifies the structural controls (mulching, catch basin inlet protection, silt fencing, etc.) and non-structural controls (minimizing ground disturbances, good housekeeping) to minimize the potential for sedimentation of runoff at the Project Study Areas. A combination of controls can be used to control stormwater; the private entities would be responsible for identifying, implementing, and maintaining the specific controls to be determined in the SWPPP.

Therefore, construction of the Proposed Action would have a short-term, negligible, less-than-significant adverse impact on stormwater.

Operation. Operation of the Proposed Action would not increase the existing impervious surface area at either of the Project Study Areas or utility corridors. Therefore, the volume of stormwater generated would not increase above current conditions under similar rainfall events.

The rehabilitations associated with the Proposed Action would continue to capture stormwater runoff from the building roofs and impervious surfaces. However, the private entities have incorporated Low Impact Development (LID) to manage stormwater infiltration and quality during operation of the Proposed Action. Specifically, the stormwater generated from the building roof and hardscapes would be conveyed to a common area and holding tank. The collected stormwater would be then be daylighted through bioswales and seasonal water features to improve the stormwater quality before it is used as irrigation water and/or discharged into the existing underground stormwater drain network. At a minimum, all of the planted vegetation immediately adjacent to the buildings would be irrigated with stormwater captured from the roofs and surrounding hardscape.

Therefore, operation of the Proposed Action would have no adverse impact on stormwater volume or quality.

Groundwater

Construction and Operation. Construction and operational activities associated with the Proposed Action would not require contact with or exposure of groundwater underlying or in the vicinity of the Project Study Areas. However, to ensure that any accidental releases of petroleum-based fluids do not impact groundwater resources, the construction contractors would maintain an emergency spill response kit and complete cleanup efforts as previously described under the Soils heading in Section 3.4.2.1.

Therefore, the Proposed Action would have no impact on groundwater quality.

3.5.2.2 No Action

No changes to the existing conditions at the Project Study Areas would occur under the No Action alternative. Therefore, no impacts to hydrology or water quality would occur. Baseline conditions would remain, as described above.

3.6 Wildlife and Habitat

3.6.1 Existing Environment

3.6.1.1 Federal-Listed Plants and Wildlife

Federally-listed species are those plant and animal species protected by the Federal Government pursuant to the Endangered Species Act (ESA) of 1973, as amended. Federally-listed species are classified as endangered (FE) or threatened. State-listed species are classified as endangered (SE), threatened, species of special concern (animals), or commercially exploited (plants).

Migratory Bird Treaty Act

The USFWS administers the Migratory Bird Treaty Act (MBTA; 16 U.S.C. §§ 703-712, as amended), which protects migratory bird species in the United States. The MBTA prohibits, unless under permit, to pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, import, export, or transport of any native migratory bird, nests, eggs, or any bird, nest, or egg parts. Additionally, EO 13186, *Responsibilities of Federal Agencies to Protect Migratory Birds*, directs federal agencies to implement the MBTA. Bird species that have been documented at the WLAMC and are protected under the MBTA are presented in Table 7.

Table 7. MBTA-Protected Bird Species Documented at the WLAMC and

Common Name	Scientific Name
Anna's hummingbird	*Calypte anna*
Black phoebe	*Sayornis nigricans*
Blue jay	*Cyanocitta cristata*
Blue-gray gnatcatcher	*Polioptila caerulea*
Bushtit	*Psaltriparus minimus*
California towhee	*Melozone crissalis*
Cassin's vireo	*Vireo cassinii*
Common raven	*Corvus corax*
Cooper's hawk	*Accipiter cooperii*
Dark-eyed junco	*Junco hyemalis*
Great horned owl	*Bubo virginianus*
Lesser goldfinch	*Spinus psaltria*
Mallard	*Anas platyrhynchos*
Merlin	*Falco columbarius*
Mourning dove	*Zenaida macroura*
Northern mockingbird	*Mimus polyglottos*
Red-tailed hawk	*Buteo jamaicensis*
Rufous hummingbird	*Selasphorus rufus*
Say's phoebe	*Sayornis saya*
Western bluebird	*Sialia Mexicana*
White crowned sparrow	*Zonotrichia leucophrys*
Yellow warbler	*Setophaga petechia*

Source: (U.S. Department of Veterans Affairs, 2018b) (USFWS, 2013)

Federally Threatened and Endangered Species and Habitat

The USFWS Carlsbad and Ventura Regional Offices identified 11 protected species with the potential to occur within the WLAMC (Table 8). None of these species or potential habitat that could support these species was encountered during a week-long survey performed at the WLAMC in November, 2017.

Table 8. Federally-Listed Species Potentially Occurring at the WLAMC

Common Name	Scientific Name	Federal Status	USFWS Office	Habitat Requirements/Notes	Habitat on WLAMC
Birds					
Coastal California gnatcatcher	*Polioptila californica*	Threatened	Carlsbad, Ventura	Coastal sage scrub: low California sagebrush, buckwheat, prickly pear cactus shrubs (under 6 feet tall), salvia	No
California least tern	*Sterna antillarum browni*	Endangered	Ventura	Coastal dunes, generally near to estuaries and coastal lagoons	No
Least Bell's vireo	*Vireo bellii pusillus*	Endangered	Ventura	Coastal, open beaches free of vegetation	No
Light-footed clapper rail	*Rallus longirostris levipes*	Endangered	Ventura	Coastal salt marshes	No
Marbled murrelet	*Brachyramphus marmoratus*	Threatened	Ventura	Coastal waters/bays, nests on island mountainsides or inland forests	No
South-western willow flycatcher	*Empirdonax traillii extimus*	Endangered	Ventura	Dense riparian trees and shrubs associated with rivers, swamps, lakes, and reservoirs	No
Western snowy plover	*Charadrius alexandrinus nivosus*	Threatened	Carlsbad, Ventura	Coastal beaches, sand spits, dunes, dredged material fill sites, saltponds	No
Amphibians					
California red-legged frog	*Rana draytonii*	Threatened	Ventura	Pools and backwaters of streams, creeks, marshes, springs, lagoons, and other aquatic habitats	No
Riverside fairy shrimp	*Streptocephalus woottoni*	Endangered	Ventura	Vernal pools	No
Vernal pool fairy shrimp	*Branchinecta lynchi*	Threatened	Ventura	Vernal pools	No
Plants					
Gambel's Water cress	*Nasturtium gambelii*	Endangered	Carlsbad	Wetland habitat; one wild population exists (Vandenberg Air Force Base)	No

Additionally, the WLAMC does not contain designated critical habitat for any ESA-listed species or wildlife corridors to support the movement or migration of wildlife other than birds or insects. The WLAMC is approximately four miles from coastal beach habitat and does not contain vernal pools, and is approximately 5-miles to the north of the Bellona Wetlands, the nearest designated Important Bird Area.

State-Listed Plants and Wildlife

A review of the California Natural Diversity Database identified California-protected endangered, threatened, and state species of concern plants and animals. These species included the Monarch Butterfly (*Danaus plexippus*), Silver-Haired Bat (*Lasionycteris noctivagans*), Gertsch's Socalchemmis Spider (*Socalchemmis gertschi*), Mud Nama (*Nama stenocarpum)* (plant), and Braunton's Milk-Vetch (*Astragalus brauntonii*) (plant).

During an on-site survey in November 2017, six occurrences of solitary Monarch butterflies were observed. Monarch butterflies are occasional transient visitors to the WLAMC during their mid-October through February migration season. Monarch butterflies were noted in both natural settings and developed areas in parts of both the north campus and the south campus. No other state-listed species were observed on the WLAMC during the survey. Additionally, the survey did not identify any habitat that could potentially support state-listed species, or evidence that

state-listed species were present at some other time, including bat roosts, droppings, and colonies of host plants near areas with prey species and foraging plants.

3.6.2 Environmental Consequences

3.6.2.1 Proposed Action

Construction. Construction activities associated with the Proposed Action would not require clearing mature vegetation at or immediately adjacent to the Project Study Areas. Habitat (trees, shrubs, herbaceous vegetation) would remain available for use by urban fauna (squirrels, common birds). However, construction activities may be a temporary nuisance to urban fauna and cause their temporarily displacement from the Project Study Areas. If vegetation is damaged or removed during construction, it would be replaced with native, non-invasive, drought-resistant varieties prior to the conclusion of the construction phase.

Overall, construction of the Proposed Action would have no impact on federally or state listed wildlife or habitat.

Operation. Operation of the Proposed Action would not result in the creation of new or improved habitat, and therefore no changes in the type of wildlife at the Proposed Action site would be anticipated. Therefore, operation of the Proposed Action would have no impact on federally or state listed wildlife or habitat.

3.6.2.2 No Action

Under the No Action alternative, there would be no changes to the habitat at the Project Study Areas and therefore no impacts to wildlife in these areas. Baseline conditions would remain, as described above.

3.7 Noise

3.7.1 Existing Environment

Sound occurs when vibrations that travel through a medium are interpreted by the biological elements of the ear. Noise occurs when sounds become undesirable, unpleasant, or damaging. Noise-sensitive receptors are residences, hospitals, libraries, recreation areas, and religious institutions.

Sound pressure levels are quantified in decibels (dB), which is dependent on both frequency and intensity, and is given a level on a logarithmic scale. The way the human ear hears sound intensity is quantified in dBA, which are levels "A" weights according to weighting curves. Three dBA is the volume at which humans perceive an apparent audible change. Sound levels for common activities and construction work are presented in Table 9.

The National Institute for Occupational Safety and Health (NIOSH) recommends that individuals working in an environment of 85 dBA or louder for an eight-hour work day limit their exposure to this noise level and wear protective earwear to help manage and prevent hearing loss due to noise exposure.

Table 9. Common Household, Industrial, and Construction Sound Levels

Sound Level (dBA)	Common Sounds	Effect
140	Jet engine	Painful
130	Near air-raid siren	Painful
120	Jet plane takeoff, siren	Painful
110	Chain saw, Thunder, Garbage Truck	Extremely Loud
100	Hand drill	Extremely Loud
90	Subway, passing motorcycle	Extremely Loud
85	Backhoe, Paver	Very Loud
80	Blow-dryer, kitchen blender, food processor, cement mixer, power saw	Very Loud
70	Busy traffic, vacuum cleaner, alarm clock	Loud
60	Typical conversation, dishwasher, clothes dryer	Moderate
50	Moderate rainfall	Moderate
40	Quiet room	Moderate
30	Whisper, quiet library	Faint

Additionally, unnecessary, excessive and annoying noise and vibration in the county of Los Angeles is controlled under Los Angeles County Ordinance Chapter 12.08 - Noise Control. This ordinance prohibits construction noise between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the County health officer. Further, construction noise generated from stationary equipment (in operation for periods of 10 days or more) operating between 7 a.m. to 8 p.m. daily, except Sundays and legal holidays, should not exceed 60 dBA at the nearest single-family residence; 65 dBA at multi-family residences; and 70 dBA at semi-residential/commercial properties.

The City of Los Angeles also has a comprehensive noise ordinance (LAMC Section 111 et seq.) that establishes sound measurement and criteria, minimum ambient noise levels for different land use zoning classifications, sound emission levels for specific uses, hours of operation for certain uses (construction activity, rubbish collection, etc.), standards for determining noise deemed a disturbance of the peace, and legal remedies for violations. This ordinance adopts the State CEQA Guidelines for determining whether a construction project would have a significant impact related to noise. Under these guidelines, a construction noise would be considered to have a significant impact if:

- Construction activities lasting more than one day would exceed existing ambient noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than ten days in a three-month period would exceed existing ambient noise levels by 5 dBA or more at a noise sensitive use; and/or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or anytime on Sunday.

Noise Receptors

Noise sensitive receptors are defined as properties where frequent human use occurs and where a lowered noise level would be of benefit. These noise sensitive receivers are considered to be residences, hospitals, libraries, recreation areas, and religious institutions.

The nearest on-campus residential area to the Building 205 and 208 Project Study Area is Building 209, which has functioned as permanent supportive housing for veterans since June 2017. Building 209 is located approximately 60-feet southeast of Building 208 and 270-feet east of Building 205. The few individual trees between these buildings are not likely to substantially limit the construction noises generated at Buildings 205 or 208 from reaching Building 209.

The nearest off-campus residential area is the neighborhood located approximately 300-feet east of Building 208. A forested area approximately 150-feet wide, and Patton Avenue, separate Building 208 from the off-campus residential area to the east. The forested area would reduce the noise levels from Buildings 205 and 208 heard at the off-campus residences.

Relative to Building 207, the nearest residential area is located off campus, approximately 500-feet to the east. A forested area approximately 150 feet wide, and Bonsall Avenue, separate Building 207 and the off-campus residential area. The forested area would reduce the audible noise levels generated from Building 207 at the off-campus residences.

The nearest WLAMC patient wing is located approximately 1,000-feet south of Building 207. There are seven schools within a 1-mile radius of the Project Study Areas. The nearest school is the Brentwood School, approximately 0.4-miles northwest (NEPAssist, 2017). There are six religious institutions within a 1-mile radius of the Project Study Areas, the nearest being the Village Church of Westwood, located approximately 0.4-miles north (NEPAssist, 2017). Given these distances and the sounds generated within this urban environment, noises generated at any of the Project Study Areas would not be apparent at these receptor locations.

Current Noise Conditions

Limited noise is generated from activities at Buildings 205 and 208. Noise is primarily generated by visitor and staff vehicles traveling to and from Buildings 205 and 208. Because the activities in Buildings 205 and 208 are for typical office work, noise generated from within these buildings would not be apparent to receptors located outside of the buildings. There are no noise generating activities associated with Building 207, as the building is currently vacant.

Limited noise is generated from routine activities at the residences at Building 209. Noise is primarily generated from residents and their visitors, as well as cars traveling along Bonsall Avenue. The noise generated within this building would be typical of a residential setting and therefore would generally not be audible to by receptors located outside of the building.

A noise survey conducted in October 2017 measured the ambient noise level at the intersection of Bonsall and Patton Avenues at an average of approximately 55 dBA. This intersection is located approximately 450-feet southeast of Buildings 205 and 208, and approximately 400-feet north/northwest of Building 207. Noise measured at this location was generated from truck deliveries related to Building 300 food preparation operations, industrial pressurization noise from Building 209, and local traffic along Bonsall Avenue, with infrequent traffic along Patton Avenue. Elevated traffic volumes (and associated noise levels) occurred during the 5 a.m. to 8 a.m. period. When passing vehicles were not present on Bonsall and Patton Ave, the Building 209 "BAC" industrial pressurization and cooling unit contributed to a continuous background noise level of at least 46 dBA. Distant traffic and HVAC units at surrounding WLAMC buildings also comprised the ongoing background soundscape, with audible insects chirping in the evening.

The noise profile in vicinity of the Project Study Areas is dominated by sound generated from transportation, industrial, and/or recreational activities. The soundscape consists of vehicle traffic along Patton Avenue, Bonsall Avenue, Vandergrift Avenue, and Arnold Avenue; recreational activities at the McArthur Field; highway traffic along I-405; and overhead airplane and helicopter flights in the vicinity of the campus. The proximity of the WLAMC to I-405 and Los Angeles International Airport (LAX) make ground and air traffic a significant source of noise.

3.7.2 Environmental Consequences

3.7.2.1 Proposed Action

Construction. Noise would be generated by construction equipment and other contractor vehicles entering and leaving the Project Study Areas during the approximate 24-month construction period. Noise from these activities would vary depending on the type of equipment being used, and the impact from this noise on a receptor would depend on the distance between the receptor and the source of the noise. The majority of construction work would be performed inside of each building, and this noise would not likely be audile to receptors outside of the building.

Construction noises outside of Buildings 205 and 208 could be audible to receptors (residents, visitors, staff) at Building 209, and to a lesser extent to receptors in nearby Buildings 156, 157, 158, and 259 (Comp Work Therapy center). Construction noises outside of Building 207 could be audible to nearby receptors in Buildings 206, 256, and 300.

Because noise levels generally decrease by approximately 6 dBA for every doubling of distance for point sources (such as a single piece of construction equipment), and approximately 3 dBA for every doubling of distance for line sources (such as a stream of motor vehicles on a busy road at a distance), construction noise levels of approximately 85 dBA, generated at any of the Project Study Areas, would decrease to approximately 50 dBA at 60-feet away. A noise level of 50 dBA is similar to the ambient noise level measured at the intersection of Bonsall and Patton Avenues. This noise level (50 dBA) is not likely to be considered a nuisance by the nearest receptors to the Project Study Areas. Additionally, construction noise is unlikely to be evident to receptors located greater than 60 feet from the noise sources at the Project Study Areas.

However, as previously described in Section 3.7.1, Building 209 is a residential building that provides housing for veterans and is in close proximity to the construction areas at Buildings 205 and 208. There is limited vegetation or other physical features separating this Project Study Area and Building 209 that would lessen construction noises.

Therefore, to further minimize construction noise impacts to the sensitive receptors in Building 209 and any other potential receptors in the vicinity of the Project Study Areas, construction activities would be performed during weekdays between 7 a.m. and 8 p.m., consistent with noise ordinances from Los Angeles County and the City of Los Angeles. Construction equipment would be equipped with appropriate sound-muffling devices (i.e. from the original equipment manufacturer or better), and engine idling would be limited to less than 3 minutes. If a construction activity noise is anticipated to cause disturb residents in Building 209 or other nearby buildings, or cannot be performed during the aforementioned daytime period, the construction contractors would notify the WLAMC at least 24 hours in advance of any such work.

Construction workers in close proximity to equipment could be temporarily exposed to noise levels above 90 dBA, which is above the permissible noise exposure level defined by the Occupational Safety and Health Administration (OSHA). These noise levels would be reduced to permissible levels by implementing BMPs such as the use of hearing protection equipment, ensuring compliance with applicable OSHA standards.

Therefore, construction noise associated with the Proposed Action would have a short-term, direct and indirect, less-than-significant adverse impact on sensitive receptors, including those at Building 209, but likely no impact on any receptors located elsewhere within or beyond the WLAMC.

Operation. Operation of the Proposed Action would generate a noise profile similar to typical residential and office activities. These activities include vehicles arriving and leaving the buildings and general routine maintenance activities such as landscaping (mowing) and building cleaning. These operational activities are currently performed at or in the vicinity of the Project Study Areas. These operational noises would not be disruptive to future residents, visitors, and staff, and would not be evident to potential receptors located beyond the immediate vicinity of Buildings 205, 207, and 208.

Therefore, noise from operation of the Proposed Action would have a long-term, direct, negligible adverse impact on the aforementioned receptors.

3.7.2.2 No Action

Under the No Action alternative, the Proposed Action would not be implemented. Existing noise generated at the Project Study Areas from visitor and staff activities would continue. These existing noises have had no documented adverse impact on receptors at or adjacent to the WLAMC.

3.8 Land Use

3.8.1 Existing Environment

Surrounding Area

The WLAMC north campus surrounding land use includes multi-unit residential, commercial, and retail buildings along the westerly and northern boundary. The southeast side of the WLAMC is bordered by the I-405, and the northeast is bordered by single-family homes (Brentwood Glen). The southern boundary is bordered by Wilshire Boulevard. The areas immediately beyond the WLAMC are zoned for one-family (R1) and public facility (PF) use to the east; R1 and commercial (C2) use to the north; R1, multiple dwelling (R3), C2, and open space (OS) use to the west; and R3 and C2 use to the south.

The University of California Los Angeles (UCLA) campus is located 1-mile east of the WLAMC. UCLA has a longstanding relationship with the VA to help improve the quality of life for veterans by providing medical care, clinics, wellness centers, and veteran support centers. This partnership brings together the expertise of the VA and of UCLA to provide benefits and support to veterans.

WLAMC North Campus

The WLAMC encompasses approximately 388 acres and is one of the largest medical center campuses in the VA system. According to the City of Los Angeles Department of City Planning, all of the WLAMC is zoned as "Institutional/Government Owned Property" (Figure 10). Additionally, according to the Planning and Zoning Information Map for Unincorporated Los Angeles County, the WLAMC Northern Campus is zoned as "Open Space," while the south campus is zoned as "Institutional" (Los Angeles County, 2018).

As previously described in Section 1, the WLAMC includes a variety of health care, administrative, storage, and maintenance buildings. The northern portion of the WLAMC includes an active oil well leased from the U.S. Bureau of Land Management to Breitburn.

Buildings 205, 207, and 208 are located on the northern portion of the WLAMC. The historic uses of Buildings 205, 207, and 208 were for patient care. Each building was part of a collection of buildings referred to as "Brentwood Hospital" in the late twentieth century. Additional details regarding the history of the buildings are described under Cultural Resources in Section 3.3.

The "quad" shared by Buildings 205, 208, and 209, is considered a "neighborhood-scale gathering and intermediate-level open space".

3.8.2 Environmental Consequences

3.8.2.1 Proposed Action

Construction and Operation. The Proposed Action is consistent with current land use designations for the property and would not require changing land use designations at or beyond the WLAMC. Building 205, 207, and 208 are currently vacant, but would become permanent supportive housing for veterans under the Proposed Action. This change to residential use would provide a total of approximately 172 new permanent housing units on the WLAMC campus, allowing the VA to continue utilizing the buildings to benefit veterans and their families by providing needed housing to homeless and at-risk veterans and their families.

Therefore, the Proposed Action would have a long-term, direct, significant beneficial impact by converting these vacant building into residential facilities with approximately 172 units of housing for homeless veterans, and would have no impact on overall land use at or in the vicinity of the WLAMC.

3.8.2.2 No Action

Under the No Action alternative, the Proposed Action development would not occur. The buildings would remain underutilized and vacant. Baseline land use conditions would remain, as described above. Therefore, there would be no impact on land use.

3.9 Floodplains, Wetlands, and Coastal Zone Management

3.9.1 Existing Environment

3.9.1.1 Wetlands

EO 11990, Protection of Wetlands, directs federal agencies to "avoid to the extent possible the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands whenever there is a practicable alternative." Federal agencies shall minimize impacts to wetlands and preserve and enhance the natural and beneficial values of wetlands in carrying out their responsibilities for the use, management, or development of federal lands.

There are no wetlands at either of the Project Study Areas or existing utility corridors. Additionally, there are no intermittent or perennial surface waterbodies on the WLAMC.

The nearest wetland is located in the arroyo, which is located approximately 450-feet southwest of the Building 205 and 208 Project Study Area, and 1,000-feet west of the Building 207 Project Study Area. A survey of the entire arroyo was conducted in November 2017 and found that the current conditions of the arroyo reflect minimal streamflow and hydrology in the northern undeveloped portion of the arroyo, and a distinct 0.5-acre area in the southernmost portion of the arroyo where water from the storm drain system discharges and where there is a low point in the topography. Soils, hydrology, and vegetation within this 0.5-acre area were indicative of wetland conditions.

This survey confirmed that the NRCS hydrology and USFWS NWI maps, which depicted a larger freshwater forested/shrub wetland system in the arroyo, are no longer consistent with the current environment and wetland features. These maps were created prior to 1996, when a Los Angeles County storm drain terminated at the northern portion of the arroyo. In 1996, the storm sewer was extended 2,500-feet south and covered with fill to facilitate future development; this fill area now contains sports fields and facilities used by the Brentwood School and no longer supports wetland features.

Figure 10. Land Use Map of Project Study Areas (VA, 2016a)

3.9.1.2 Floodplains

EO 11988, Floodplain Management, was issued in 1977 in furtherance of NEPA and the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973, as amended (42 U.S.C. §4001 et seq.). EO 11988 requires federal agencies to "avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development whenever there is a practicable alternative".

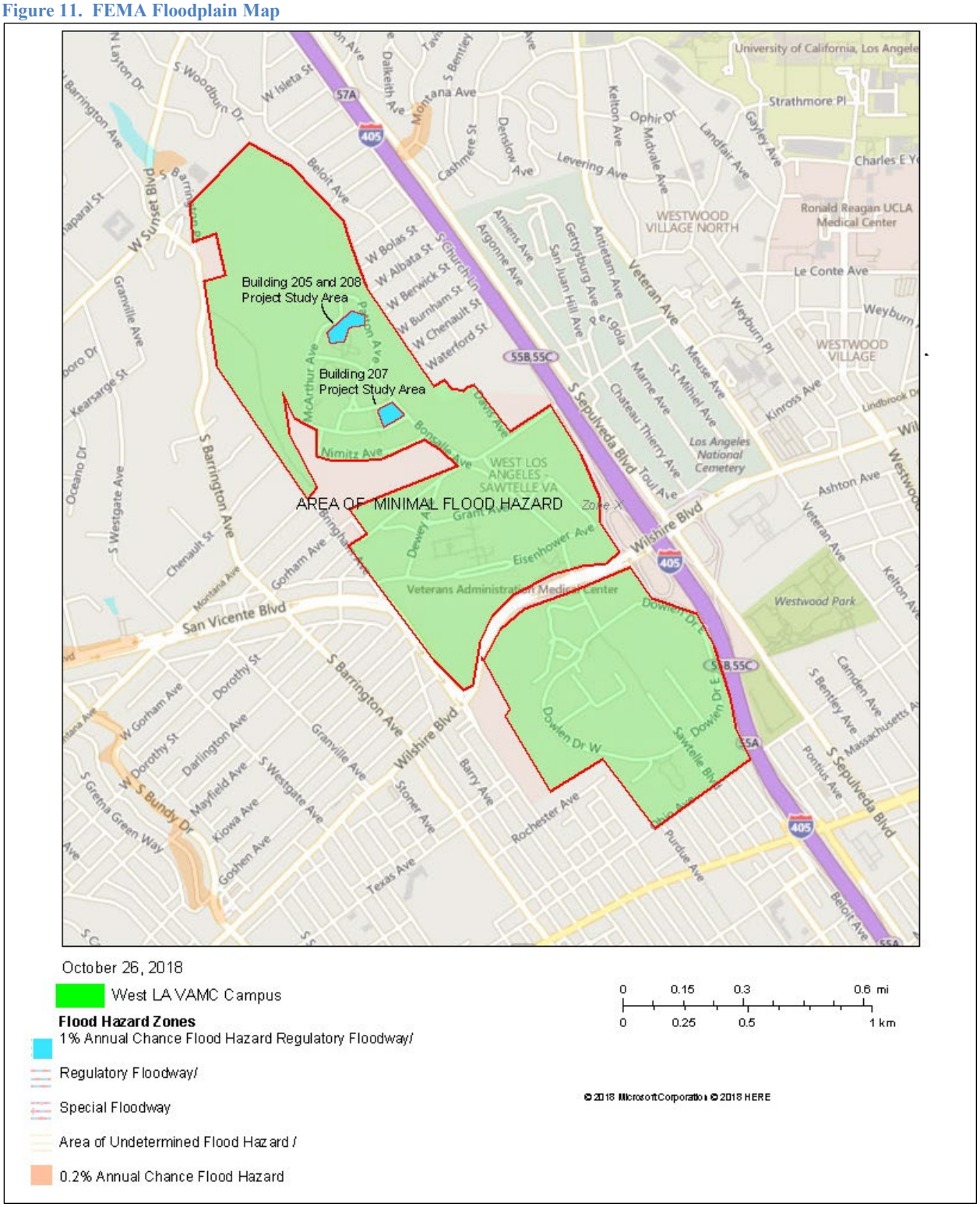
The Project Study Areas are located on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) No. 06037C1580F and 06037C1590F, dated September 26, 2008 (FEMA, 2008). According to the FIRMs, the Project Study Areas are in an area of minimal flood hazard, outside of the 0.2%- and 1%-annual-chance (500-year and 100-year, respectively) flood zones, and have a low risk of flooding (Figure 11). Due to the low risk of potential flooding, the purchase of flood insurance is not required in these areas (FEMA, 2017b). There have been no reported incidents of flooding on the WLA Campus in at least the last 30 years (National Weather Service, 2017).

3.9.1.3 Coastal Zone Management

The Coastal Zone Management Act (CZMA) was enacted in 1972 to preserve, protect, develop, and where possible, restore and enhance the resources of the nation's coastal zone. Coastal States are encouraged to develop state coastal management programs, and comprehensively manage and balance competing uses of, and impacts to, coastal resources. The United States Department of Commerce National Oceanic and Atmospheric Administration's (NOAA) approves coastal management programs. The CZMA requires that any federal actions affecting any land or water use, or natural resource of the coast be consistent with the enforceable policies of a state's federally-approved coastal management program. The California Coastal Management Program was approved by NOAA in 1978. Federal consistency evaluations under the CZMA in California are conducted by the California Coastal Commission (CCC). The California coastal zone varies in width from several hundred feet in highly urbanized areas and up to five miles in some rural areas and extends offshore three miles.

According to the CCC maps, the WLAMC is not located within a designated Coastal Management Zone (CMZ). The nearest CMZ is located approximately 3-miles southwest of the WLAMC (CCC, 2018). Additionally, the Project Study Areas are considered an inland developed urban area more than 1,000-yards away from the mean high tide line of the Pacific Ocean, which is located approximately 4-miles southwest of the WLAMC.

Figure 11. FEMA Floodplain Map



3.9.2 Environmental Consequences

3.9.2.1 Proposed Action

Wetlands

Construction. Construction of the Proposed Action would not occur within any wetland area. If sediment-laden stormwater runoff was allowed to enter the catch basins at Buildings 205 and 208, it would be conveyed through the underground stormwater system piping, which discharges to the grass- and shrub-covered field located immediately west of Building 336. This stormwater discharge point is located approximately 450-feet north of the wetland within the arroyo and separated by pervious vegetated soils. Given this distance and physical setting, the stormwater is not anticipated to reach the arroyo wetland.

If sediment-laden runoff entered the catch basins at Building 207, it would be conveyed to the underground stormwater network that eventually discharges into the off-site LA County Flood Control District (FCD) stormwater system located at the eastern end of Montana Avenue. Therefore, the stormwater would not impact the arroyo wetland.

To minimize the potential sedimentation of stormwater runoff, the construction contractors would implement the BMPs for soil erosion and sedimentation specified in the SWPPP/CGP and the stormwater management plan associated with the MS4 permit. These BMPs would include engineering and administrative controls to reduce the overall potential for erosion of exposed soils and sedimentation of stormwater runoff.

Therefore, construction of the Proposed Action would have a short-term, direct, negligible adverse impact on wetlands.

Operation. Any soils previously exposed during construction would be stabilized with a similar cover (either vegetation or hardscape) to minimize erosion from wind or stormwater runoff. Residents, staff, and visitors would be allowed to park vehicles in designated paved parking areas, avoiding the need to park along grass-covered road shoulders and potentially disturb soils in those areas. The routine maintenance activities (mowing, building maintenance) at the Project Study Areas have mechanisms to directly or indirectly impact the arroyo wetland. Therefore, operation of the Proposed Action would have no impact on wetlands.

Floodplains

Construction and Operation. The Project Study Areas are outside of 0.2% and 1% floodplains. Therefore, the Proposed Action would not have an impact on floodplains and would not be anticipated to be impacted by 100- or 500-year floods.

Coastal Zone Management

Construction and Operation. The Project Study Areas are not located within a CMZ, the nearest of which is located approximately 4-miles west of the WLAMC. Additionally, construction and operation of the Proposed Action do not have mechanisms to directly or indirectly impact coastal zone resources. Further, the thousands of other developments located between the Project Study Areas and the coastal zone would have a comparatively greater influence on coastal zone resources than the Proposed Action. Therefore, the Proposed Action would have no effects upon coastal uses or resources. Accordingly, the VA had determined that a consistency determination is not required for the Proposed Action..

3.9.2.2 No Action

Under the No Action alternative, there would be no impact to wetlands, floodplains, or coastal zone resources. Baseline conditions would remain, as described above.

3.10 Socioeconomics and Community Services

The Proposed Action is intended to benefit the socioeconomic conditions of at-risk and homeless veterans and their families in the six counties located in the GLAHS service area (Kern, Los Angeles, San Luis Obispo, Santa Barbara, and Ventura Counties) by providing a needed community service (no-cost housing) at the WLAMC. Therefore, this section analyzes the potential impacts of the Proposed Action on the socioeconomic conditions of this population, and community services as it relates to permanent supportive housing at the WLAMC.

3.10.1 Existing Environment

Veteran Population

The VA National Center for Veterans Analysis and Statistics (NCVAS) provides a broad range of data and statistics about veteran populations and programs throughout the U.S. According to the NCVAS, approximately 417,183 veterans live in the GLAHS service area; of these, 294,652 live in Los Angeles County (NCVAS, 2018). The veteran population in the GLAHS service area is projected to decrease to 350,753 by 2020; 237,944 by 2030; and 153,027 by 2045 (NCVAS, 2018). The projected decrease is attributed to the advancing age of veterans in the GLAHS service area.

Veteran Homelessness

On a single night in January 2017, nearly one of every four people experiencing homelessness did so in Los Angeles or New York City. In 2017, nearly all people experiencing homelessness in New York City were sheltered (95%). By comparison, only 25 percent of those experiencing homelessness in Los Angeles were sheltered (U.S. HUD, 2017).

Just under 30 percent of all veterans experiencing homelessness in the U.S. live in California (29% or 11,472 veterans). In 2017, Los Angeles County had the highest rate of unsheltered homeless veterans in the U.S., with a rate of 76.1% (U.S. HUD, 2017).

Within Los Angeles County, the population of homeless veterans was 3,701 in 2016, increased to 4,742 by 2017, and saw a decrease to 3,819 in 2018 (LAHSA, 2018). The homeless populations and homeless veteran populations for Los Angeles County in 2018 are presented in Table 10 (LAHSA, 2018).

Factors that contribute to homelessness include but are not limited to increased cost of living, availability of affordable housing, poverty, changes in social welfare benefits, and lack of affordable mental health services.

Table 10. Homeless Populations for Los Angeles County, 2018

Homeless Population Category	Total	Unsheltered	Sheltered
All Persons	53,195	39,826	13,369
All Veterans	3,819	2,778	1,041
Chronically Homeless Veterans	1,995	1,921	74
Children in Families (under 18)	132	109	23

Source: LAHSA, 2018

Employment

The unemployment rate in Los Angeles County in 2016 was approximately 5.8% for veterans and 6.5% for non-veterans (U.S Census Bureau, 1-Year Estimate for 2016). The national unemployment rate among veterans was 6.4% according to the 2012-2016 ACS 5-Year Estimates (U.S. Census, 2016). According to this same survey, 9.1% of veterans in Los Angeles County earned income hat was below the poverty level, compared to 15.8% for non-veterans (U.S. Census, 2012-2016 American Community Survey, accessed 2018). The average income for veterans was estimated at $39,358. Nationally, 7.1% of veterans earned income that was below the poverty level and the average income for veterans was estimated at $38,175 (U.S. Census, 2016).

Housing

Of veterans in Los Angeles County, approximately 40% did not have a permanent place to live when leaving the military. One in five (20.7%) post-9/11 veterans and nearly one in three (29.7%) pre-9/11 veterans reported unstable housing, placing them at increased risk for future homelessness (Castro, Kintzle, and Hassan, 2014).

In 2017, the WLAMC provided bridge housing (through the Grant and Per Diem [GPD] program) to 1,766 veterans either at the WLAMC or a community shelter off campus.

To provide housing and economic support to veterans in need, the Housing and Urban Development-VA Supported Housing (HUD-VASH) program has awarded approximately 8,000 vouchers nationwide for housing for 2016 (HUD, 2018b). In California, approximately 2,198 vouchers were awarded in 2018, and of this total, 933 vouchers were awarded through the GLAHS (HUD, 2018c). VA's Supportive Services for Veteran Families (SSVF) also provides assistance to veterans in need. HUD has determined that the fair-market monthly rate is $1,067 for a one room efficiency apartment and $1,248 for a one-bedroom apartment in the City of Los Angeles (HUD, 2018). However, approximately 900 vouchers per year are not allocated, partially because veterans are not able to locate housing at a rental rate equal to or below the applicable aforementioned rental rates, or a landlord willing to participate.

3.10.2 Environmental Consequences

3.10.2.1 Proposed Action

Construction. Construction of the Proposed Action would have a short-term, negligible but beneficial impact on the local economy by providing temporary construction jobs to local qualified contractors. These benefits would end once the construction phase is completed. The construction contractors would also be anticipated to purchase selected building materials and supplies from local suppliers in Los Angeles County. These expenditures would have a short-term beneficial impact on the local economy.

Operation. Following construction, operation of the Proposed Action would provide approximately 172 units of permanent dedicated housing at the WLAMC for at-risk and homeless veterans and their families in the GLAHS service area. Doing so would have a long-term, significant beneficial impact on this population, as it would provide no-cost housing in a safe, supportive community. The Proposed Action would also facilitate the ability of medical, social, and safety professionals to offer these services more directly and frequently to this veteran population.

Operation of the Proposed Action would also allow the VA to meet a requirement of the West Los Angeles Leasing Act of 2016, and would be consistent with the January 2015 settlement agreement to help the VA end veteran homelessness in Greater Los Angeles and the Draft Master Plan to provide bridge and permanent supportive housing and services for underserved veteran populations at the WLAMC.

Operation of the Proposed Action would not decrease or eliminate existing homeless veteran housing and support programs (e.g. HUD-VASH).

Therefore, the Proposed Action would have a long-term, significant beneficial impact on socioeconomics and community services provided to veterans and their families, as well as medical professionals who serve these populations.

3.10.2.2 No Action

Under the No Action alternative, Buildings 205, 207, and 208 would not be repurposed for veteran housing. The buildings would continue to remain vacant for the foreseeable future. The current and projected number of at-risk and homeless veterans and their families in the GLAHS service area would remain unchanged under the No Action alternative. Therefore, the No Action alternative would have a long-term, significant adverse impact on socioeconomics and community services.

Additionally, under the No Action alternative, the VA would not be in compliance with the West Los Angeles Leasing Act of 2016; the January 2015 settlement agreement to help the VA end veteran homelessness in Greater Los Angeles; and would not be consistent with the Draft Master Plan to provide bridge and permanent supportive housing and services for underserved veteran populations at the WLAMC.

3.11 Solid and Hazardous Materials

3.11.1 Existing Environment

3.11.1.1 Hazardous Materials Management Regulatory Framework

Hazardous and toxic materials or substances are generally defined as materials or substances that pose a risk (i.e., through either physical or chemical reactions) to human health or the environment. Regulated hazardous substances are identified through a number of federal laws and regulations. The most comprehensive list is contained in 40 CFR 302, and identifies quantities of these substances, when released to the environment, that require notification to a federal agency. Hazardous wastes, defined in 40 CFR 261.3, are considered hazardous substances. Generally, hazardous wastes are discarded materials (e.g., solids or liquids) not otherwise excluded by 40 CFR 261.4 that exhibit a hazardous characteristic (i.e., ignitable, corrosive, reactive, or toxic), or are specifically identified within 40 CFR 261. Petroleum products are specifically exempted from 40 CFR 302, but some are also generally considered hazardous substances due to their physical characteristics (i.e. especially fuel products), and their ability to impair natural resources.

Asbestos-Containing Materials

The rehabilitation of asbestos-containing building materials is regulated under the USEPA NESHAP and the OSHA Asbestos Construction Standard (CFR 1926.1101). The state agencies regulating asbestos are CalEPA (Air Resources Board and Department of Toxic Substances Control) and CalOSHA, under 8 California Code of Regulations (CCR) 1529, 5203, 341.6-341.14

and the California Health & Safety Code. Additionally, any building material potentially disturbed during construction or rehabilitation activities is required to be managed according to VA *Specifications 02 82 11 Traditional Asbestos Abatement* through *02 82 13.41 Asbestos Abatement for Total Demolition Projects*. Further, California asbestos law requires employees and contractors working on asbestos projects greater than 100-square feet with an asbestos concentration above 0.1 percent to register with the Asbestos Contractors' Registration Organization.

Lead-Based Paint

The disturbance of LBP is regulated by OSHA and the NESHAP statue for general dust control. The disposal of commercial waste materials containing lead from rehabilitation, abatement, and/or demolition is regulated by the Resource Conservation and Recovery Act (RCRA). Painted surfaces scheduled for disturbance are required to be tested and abated in accordance with VA Specification *02 83 33.13 Lead-Based Paint Removal and Disposal*, and Cal/OSHA (Leading Construction Standard, Title 8 §1532.1).

Polychlorinated Biphenyls

Building materials "coated or serviced" with polychlorinated biphenyls (PCB) bulk product waste (e.g. caulk, paint, mastics, sealants) at concentrations equal to or greater than 50 parts per million (ppm) at the time of designation for disposal are to be managed as PCB bulk product waste in accordance with 40 CFR 761.3 and the USEPA "PCB Bulk Product Waste Reinterpretation" memorandum dated October 24, 2013.

3.11.1.2 Building-Specific Phase 1 Environmental Site Assessments

Buildings 205 and 208

A Phase I Environmental Site Assessment (ESA) of Buildings 205 and 208 was performed by Mabbett & Associates, Inc. (Mabbett) in August 2017 (Mabbett, 2017). The Phase I ESA included a site visit, interviews with persons knowledgeable about the site, a review of historic information, and a review of local, state, and federal environmental regulatory information for the site and surrounding area. The following Recognized Environmental Conditions (RECs) were identified during the Phase I ESA for Buildings 205 and 208:

- Confirmed presence of asbestos-containing building materials and lead-based paint in Buildings 205 and 208, based on available reports.
- Based on the ages of Building 205 and 208 (constructed prior to 1978), PCBs may be present at regulated concentrations in building materials (e.g. caulks, glaze).
- Observation of visible mold within selected interior areas in Buildings 205 and 208.
- Presence of dilapidated or non-functioning refrigerators and air conditioning equipment in Building 205, which may contain ozone-depleting substances (ODS) regulated under 42 U.S.C. § 7401. The dilapidated condition of these units poses a material threat in that it may cause or contribute to the failure of these units and release ODS to the environment.

Building 207

A Phase I ESA was conducted for Building 207 in August 2018 (Mabbett, 2018). The Phase I ESA included a site visit, interviews with persons knowledgeable about the site, a review of historic information, and a review of local, state, and federal environmental regulatory information for the site and surrounding area. The following RECs were identified during the Phase I ESA for Building 207:

- Confirmed presence of asbestos-containing building materials and lead-based paint in Building 207, based on available reports.
- Likely presence of polychlorinated biphenyls (PCBs) in building materials due to the age of Building 207, which was constructed prior to 1978.
- Presence of dilapidated or non-functioning refrigerators and air conditioning equipment in Building 207, which may contain ODS that are regulated under 42 U.S.C. § 7401. Presuming that ODS remain in these units, the dilapidated condition of these units poses a material threat in that it may cause or contribute to the failure of these units with a release of the ODS to the environment.

No other solid wastes or hazardous materials are known to be or have been present at the Project Study Areas or buildings.

3.11.2 Environmental Consequences

3.11.2.1 Proposed Action

Construction. Prior to any construction activities that may physically impact regulated building materials, the construction contractors would make appropriate notifications and obtain applicable permits. During rehabilitation, appropriate containment and safety measures would be implemented by licensed contractors to ensure that regulated building materials are not released as to the air (as dust) or soil.

Construction debris would be segregated based on its content (e.g. with or without regulated building materials) and containerized in covered roll-offs temporarily staged in a designated area within the construction site. For the Building 205 and 208 Project Study Area, the designated area would be located to the north of Building 205 and east of Building 208 (between the buildings and Patton Avenue). For the Building 207 Project Study Area, the designated area would be in the loading dock located on the northern side of the building. The debris would be transported off-site for disposal, recycling, or reuse based on its content. The nature and quantities of the debris generated during construction would be similar to a typical small-scale commercial construction/rehabilitation project. Accordingly, the annual volume of solid waste would be negligible compared to the total solid waste volume generated and disposed of in the Los Angeles region.

Additionally, all construction contractors would comply with the aforementioned federal and state regulations for managing solid and hazardous materials. Likewise, all solid and hazardous debris would be transported by a licensed contractor in accordance with all state and federal requirements and disposed of at an EPA-approved facility. These management measures would ensure that potential adverse impacts from construction activities would remain at short-term, direct, less-than-significant adverse levels on solid and hazardous materials.

Operation. The operation of the Proposed Action would not require the storage, handling, or use of hazardous materials. The types of solid wastes generated would be similar to those from Building 209 and include discarded recyclable materials (glass, paper, metal), non-recyclable debris, and food waste. Compared to current conditions, there would be an increase in the volume of solid sanitary wastes generated at each building. According to CalRecycle, in 2016 California residents generated approximately 4.9 pounds of waste per day (California Department of Resources Recycling and Recovery, 2018). Based on an occupancy rate of 172 individuals, operation of the Proposed Action would generate approximately 880 pounds of waste per day, which is equivalent to approximately 160 tons per year. In 2016, California landfilled or exported for landfill 35.2 million tons of waste. Therefore, the volume of waste generated during operation of the Proposed Action would account for less than 0.001% of the anticipated total annual volume of waste generated in California.

During operations, solid wastes would be segregated for disposal or recycling in designated areas, and collected on a routine basis by a qualified vendor for appropriate of-site disposal.

Therefore, operation of the Proposed Action would have a long-term, less-than-significant adverse impact regarding solid wastes.

3.11.2.2 No Action

Under the No Action Alternative, regulated building materials (asbestos, lead, PCBs) would remain in Buildings 205, 207, and 208. Deterioration of these regulated building materials could pose a long-term, moderate adverse impact to the health of the individuals working in or visiting these buildings. However, the VA would continue to minimize this risk of exposure to regulated building materials by implementing routine operational and maintenance control measures. No other changes to solid and hazardous materials management would occur under the No Action alternative. Therefore, the No Action alternative would have a long-term, direct, moderate adverse impact regarding regulated building materials.

3.12 Utilities

3.12.1 Existing Environment

Several studies have been performed to assess the condition of utilities at the WLAMC. In 2017, the *VAWLA Site Utility Assessment – Phase 1 Utility Report* (Phase 1 Utility Report) was performed to assess and evaluate the existing site utility conditions, calculate site utility capacities, and study and analysis systems for site development (VA, 2017a). The Phase 1 Utility Study Report recommended that an additional analysis ("Phase 2 Site Utility Assessment") should be performed of "critical systems that will be relied upon for future development/rehabilitation of the overall campus," (VA, 2017a). It was recommended that the Phase 2 utility assessment include field work and detailed underground surveys of utility lines including those for sanitary sewer, potable water, and electrical systems associated with proposed "transitional housing" in the north campus, including at Buildings 205, 208, 209, and 259 (VA, 2017a). A Phase II Utility Survey is currently underway. In the interim, a WLAMC utilities conditions assessment report is being prepared to assess the age, condition, and suitability of utility systems and infrastructure to support WLAMC rehabilitation efforts and new housing units (VA, 2018). The utility analysis presented in this section incorporates information presented in the Phase 1 Utility Report (VA, 2017a) and updated information provided by VA in 2018.

Utilities currently provided to Buildings 205, 207, and 208, include sanitary sewer, potable water, electric, steam, natural gas, and telecommunications. Information for the sanitary sewer, potable water, and electrical utilities presented in these reports is summarized in the following subsections. Under the Proposed Action, the steam and natural gas utilities would not be used, so existing information for these utilities is excluded from this summary. A discussion of the stormwater utility system is provided under the Stormwater heading in Section 3.5.1.2.Sanitary Sewer

Wastewater treatment for the WLA Campus is provided through contracted services from LADWP. LADWP maintains a wastewater partnership with the City of Los Angeles Sanitation (LASAN), as the Los Angeles region public works entity responsible for sanitation operations.

The WLAMC sanitary sewer system ranges in age from 10 to over 80 years old and consists of a network of mains and branch connections that collect building sanitary sewage that is then gravity-conveyed via underground sewer pipes throughout the campus in a general northwest to southeast direction (VA, 2018). This general direction of gravity flow is based on the relative elevation difference between the north (higher elevation) and south (lower elevation) areas of the WLAMC.

The main lines collect and converge the wastewater with a final connection to the LASAN's sewer system at a manhole located on the southern boundary of the WLAMC adjacent to Ohio Avenue and Sawtelle Boulevard.

Many of the main branches and laterals on the north campus have major deficiencies caused by root intrusions, and cracks likely caused by seismic activities. Underground video camera inspections have revealed most of the original construction building laterals and main branches have some form of major defect that compromises the integrity of the pipe system. The bulk of the system consists of original 6-inch, 8-inch, and 10-inch diameter clay pipe in poor shape. Although Building 208 has a newer PVC building connection, it connects to the original clay pipe branch.

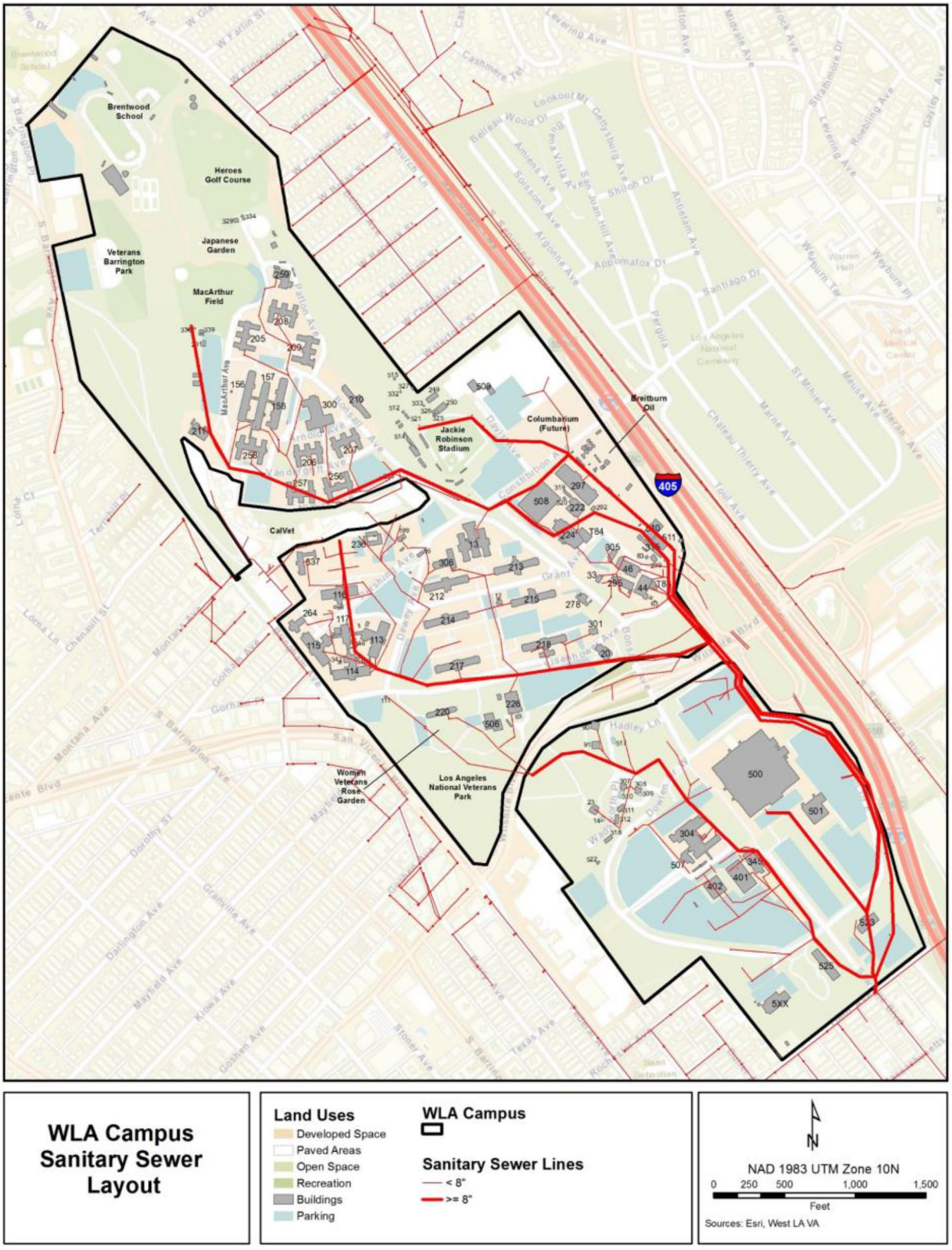
The individual sanitary sewer lateral lines that extend from Building 205, 207, and 208, eventually connect to a 12-inch diameter main (segments A-7 and A-6) beneath Nimitz Avenue (Figure 12). (A description of the sanitary sewer utility corridors is presented under the Transportation heading in Section 3.12.1.) The majority of this 12-inch diameter main (segment A-7) operates at approximately 67% of its load capability (indicating it has sufficient capability), however the downstream segment (A-6) receiving sewerage from Building 207 is at 120% of its load capability (indicating it is overloaded). This main line transitions to segment A-5, also operating at 120% of its capability, until reaching the south campus main headers (A-4 through A-0) that have been upgraded to 18-inch and 24-inch lines and which generally operate at less than 50% of their load capability. In general, the north campus sewer system is considered to be in poor condition and in excess of current load carrying capability.

The peak calculated sanitary sewage demand load is estimated at 580 drainage fixture units (DFUs) for Building 205, at 306 DFUs for Building 207, and at 654 DFUs for Building 208 (VA, 2017a).

Sanitary Sewer Utility Corridor

The existing sanitary sewer utility corridor has separate laterals that extend from the south sides of Buildings 205 and 208 (Figure 12). These laterals join where they pass under a portion of Bonsall Avenue, then extend south under Patton Avenue between Buildings 158 and 300, under a portion of Arnold Avenue and Vandergrift Avenue, and connect to the larger main in the immediate vicinity of Building 257. The Building 207 lateral extends south, crosses under

Figure 12. WLAMC Sanitary Sewer Utility Corridors



Vandergrift Avenue, and also feeds into this larger main. This main corridor continues south, turns east at Constitution Avenue, extends south into the south campus following the alignment of Dowlen Drive East, and eventually discharges in the LADWP sanitary sewer network at border of the south campus along Sawtelle Boulevard.

The existing sanitary sewer utility corridor is located beneath hardscape (roads, sidewalks) and previously disturbed grounds.

3.12.1.1 Potable Water

The Los Angeles Department of Water and Power (LADWP) supplies water to the WLAMC and customers in the greater Los Angeles region. LADWP provides two domestic water main lines serving the WLAMC: a 12-inch diameter water main line for the north campus and a 10-inch diameter water main line for the south campus (Figure 13). There is a third connection from San Vicente Boulevard near Wilshire Boulevard. The water system provides domestic service, fire service to fire hydrants, and building sprinkler systems for the existing structures and irrigation service for the north and south campus.

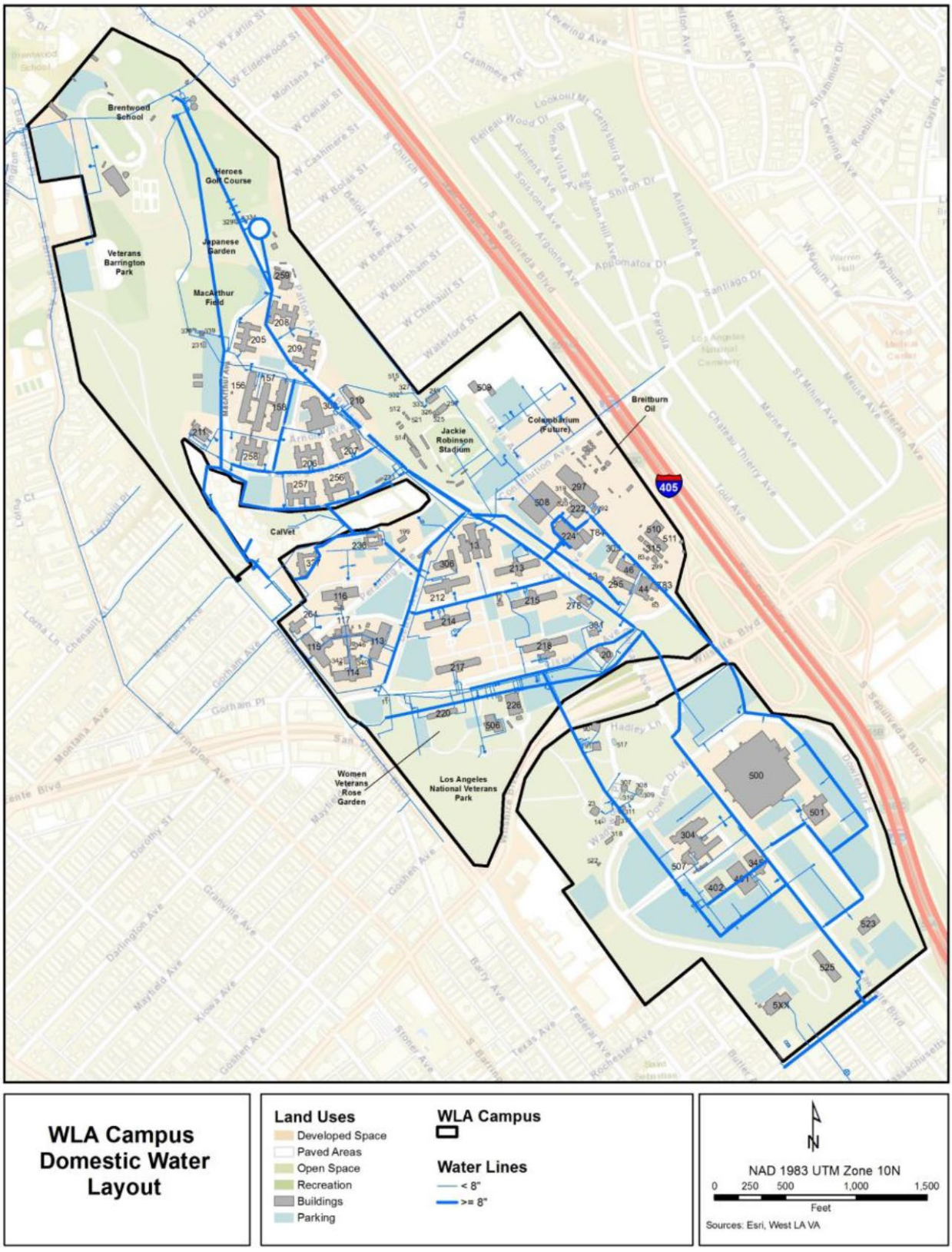
The north campus connection, known as the Brentwood connection, is located at the WLAMC northern boundary adjacent to Brentwood School. This LADWP-metered water main distributes water through three branch supply lines (two 8-inch lines and one 12-inch line) within the WLAMC Campus. Collectively, these branch lines provide domestic water for campus-wide usage. The Brentwood connection can directly replenish the WLAMC's adjacent 800,000-gallon distribution storage tank or bypass the tank to provide direct service to the WLAMC domestic water network. The south campus is served by the north campus supply branches extending under Wilshire Boulevard. It is noted that the most constrained portion of the domestic water network occurs in leg "A-2", which is located along the main junction point for the flow of water from the north service connection near the northern end of Patton Avenue (VA, 2018).

Material of construction for the main portions of the domestic water piping system are cement-lined ductile cast iron pipes, which were installed during construction in 1989. However, a 12-inch diameter high pressure PVC C900 main was installed in 2012 and connects the WLAMC storage tanks to all north campus buildings. The lateral and branches to building service entrances range in age from 10- to 50-years old and were generally constructed as sites were developed or major upgrades occurred.

All domestic water mains and large diameter laterals have sufficient capacity and capability to support the present load and have capacity for additional growth based on domestic use. However, low water pressures have been previously reported at Buildings 205 and 208, as well as at Buildings 156, 157, 240, 259, and 300 in the north campus. Additional capacity enhancements such as larger water lines and water pressure boosters or pump stations have been recommended to increase pressure (VA, 2018).

The WLAMC domestic water distribution main system is used to provide fire sprinkler water demands with a common water line typically provided to each building. The common water line is separated into both fire water and domestic water as the common line approaches a building. The fire water line and domestic water line are then equipped with isolation valves and backflow preventers to protect the campus water distribution system from contamination. Fire suppression system monthly fire pump tests including Buildings 205, 207, and 208, indicated the systems passed with no issues or concerns (VA, 2018).

Figure 13. WLAMC Potable Water Utility Corridors



The following subsections summarize the water utility conditions at Buildings 205, 207, and 208, as presented in the Phase 1 Utility Report (VA, 2017a) and informed by VA in 2018.

Building 205

The building has a single 4-inch domestic water service entrance observed as being in good condition (for the visible portions). The facility has a corresponding service entrance backflow preventer located above-grade outdoors on the south lawn. Service entrance piping enters into a mechanical room located on the basement level. VA-provided record drawings indicate that the facility domestic water service is constructed of ductile cast iron pipe (likely cement-lined), installed in 1987. The system appeared to have been replaced in 2009.

The domestic water service has a peak capacity of 200 gallons-per-minute (GPM), and, based on the facility's plumbing fixtures (determined from available record drawings), has a peak utilization demand flowrate of 189 GPM with flushometer water closets being the dominant type.

Building 207

The building has a single 4-inch domestic water service entrance observed as being in good condition (for the visible portions). Service entrance piping enters into a mechanical room located on the basement level.

The domestic water service entrance has a peak capacity of 200 GPM and, based on the facility's plumbing fixtures (determined from available record drawings), has a peak utilization demand flowrate of 145 GPM with flush tank water closets being the dominant type.

VA-provided record drawings indicate the facility domestic water service is constructed of ductile cast iron pipe (likely cement-lined), which was installed in 1987. The system appeared to have been replaced in 2009.

Building 208

The building has a single 4-inch domestic water service entrance observed as being in good condition, for the visible portions thereof. The facility has a corresponding service entrance backflow preventer located above-grade outdoors on the west lawn. Service piping enters into a mechanical room located in the basement.

The domestic water service entrance has a peak capacity of 200 GPM and, based on the facility's plumbing fixtures (determined from available record drawings), has a peak utilization demand flowrate of 180 GPM with flushometer water closets being the dominant type.

VA-provided record drawings indicated that the water service is constructed of ductile cast iron pipe (likely cement-lined), installed in 1987. It was unclear if the system had been rehabilitated or replaced since its installment.

Overall, all domestic water mains and large diameter laterals modeled have sufficient capacity and capability to support present load and have capacity for additional growth based on domestic use only (VA, 2018). The most constrained portion of the domestic water network, based on domestic water consumptions, occurs in leg A-2, which represents the main junction point for the flow of water from the north service connection.

Potable Water Utility Corridor

The existing potable water utility corridor begins at the Brentwood main at the northern border of

the north campus, then extends to the south, beneath Patton Avenue, where separate laterals extend to the west side Building 208 or the south side of Building 205 (Figure 13). The utility corridor then passes between the two buildings, turns southeast, crosses below a portion of Bonsall Avenue, and then generally extends south, following the alignment of Bonsall Avenue. A lateral extends to the south side of Building 207 from the intersection of Bonsall Avenue and Vandergrift Avenue. The potable water utility corridor continues south along Bonsall Avenue to the south campus, where separate laterals extend to the buildings in that area.

The portion of the existing potable water utility corridor between the Brentwood main and Patton Avenue passes beneath the central portion of the WLAMC golf course. South of the golf course, the corridor is generally located beneath existing hardscape (roads, sidewalks) and previously disturbed grounds.

3.12.1.2 Electric Utility

Electrical utility power at the WLAMC is provided by Southern California Edison (SCE) (VA, 2017a). The WLAMC consumed 47,955 megawatt hours (MWh) in 2015 and 46,707 MWh 2016. Approximately 43 percent of the WLAMC electrical demand occurs during daytime hours.

Electrical circuits enter the WLAMC south campus from the SCE Sawtelle Main Power Substation located on Ohio Avenue (VA, 2017a). Overhead lines extend from this main to other locations within the WLAMC, including the SCA-owned Substation #2 near Building 299. Substation #2 is approximately 45 years old and is in fair condition. Substation #2 serves all of the north campus, including Buildings 205, 207, and 208. Substation #2 consists of exterior transformers feeding distribution equipment located indoors. There are eight 4,160V circuits (#1 through #8) that originate from Building 299 switchgear and extend through 5 kilovolt (kV) underground duct banks to the north campus buildings. The feeders for the eight circuits are in good condition with main branches being installed approximately 10 years ago. However, circuits #7 and #8, which supply nearly all of the buildings in the north campus, currently operate at approximately 87% of their capacity. The remaining circuits #1 thru #6 all have remaining ability to handle additional load (they operate at 62% or less of their capacity). The total demand load on Substation #2 from meter readings is 6.2 MW but could be as high as 12-13 MW if all buildings on the north campus were in operation. VA recommended an analysis (including thermal imaging) and metering of most portions of circuits #7 and #8 be conducted to verify capability of the existing system to handle current loads to avoid damage to distribution equipment.

The duct banks between SCE Substations #2 and the north campus are approximately 50 years old. Although the duct banks were only visually assessed during the prior utility surveys, they were assumed to be in good condition (VA, 2018). The electrical distribution equipment exiting from the SCA Substation #2 is owned by the WLAMC. This equipment ranges in age between 1 and 127 years, with conditions ranging from good to poor (VA, 2018). The older systems are subject to continuous O&M repairs by VA engineering and maintenance staff (VA, 2017a).

Information regarding electrical power systems and estimated electrical loads was available for many of the buildings at the WLAMC, including Buildings 205, 207, and 208 (VA, 2017a; VA, 2018). A summary of the information for each building is presented below.

- Building 205. The estimated electric load is 1,027 KVA. The Building currently has a diesel-powered 150 kW emergency generator that is 21 years old. A 600 KW generator has been recommended to provide emergency power.

- Building 207. The estimated electric load is 663 KVA. Building currently has a diesel-powered 45 KW emergency generator that is 45 years old. The building is served by a 300 KVA pad-mounted transformer.
- Building 208. The estimated electric load is 712 KVA. A 600 KW generator is to be installed to provide emergency power.

These values are similar to the electrical load of 697 KVA at Building 209, which is currently used as a transitional housing facility similar to the Proposed Action (VA, 2018).

The WLAMC also obtains electricity from more than 7 MW of photovoltaic (PV) power systems installed on building roofs, parking lot canopies, and ground-mounted systems at the WLAMC. The electricity generated by the PV systems is returned back into the WLAMC electrical grid.

Electric Utility Corridor

For the 5 kilovolt electrical utility provided by SCE, a new trunk line would be extended from Constitution Avenue at I-405 to the north campus. The electric line would then follow the existing underground electrical duct bank that passes beneath a portion of Bonsall Avenue, extends northwest beneath a portion of Nimitz Avenue and Vandergrift Avenue, and has a lateral extending to the southwest corner of Building 207 (Figure 14). The existing electrical utility corridor then continues north along Patton Avenue between Buildings 158 and 300, passes west beneath Bonsall Avenue, then branches off with separate laterals to Buildings 205 and 208.

The proposed and existing electric utility corridor is located beneath hardscape (roads, sidewalks) and previously disturbed grounds.

3.12.2 Environmental Consequences

3.12.2.1 Proposed Action

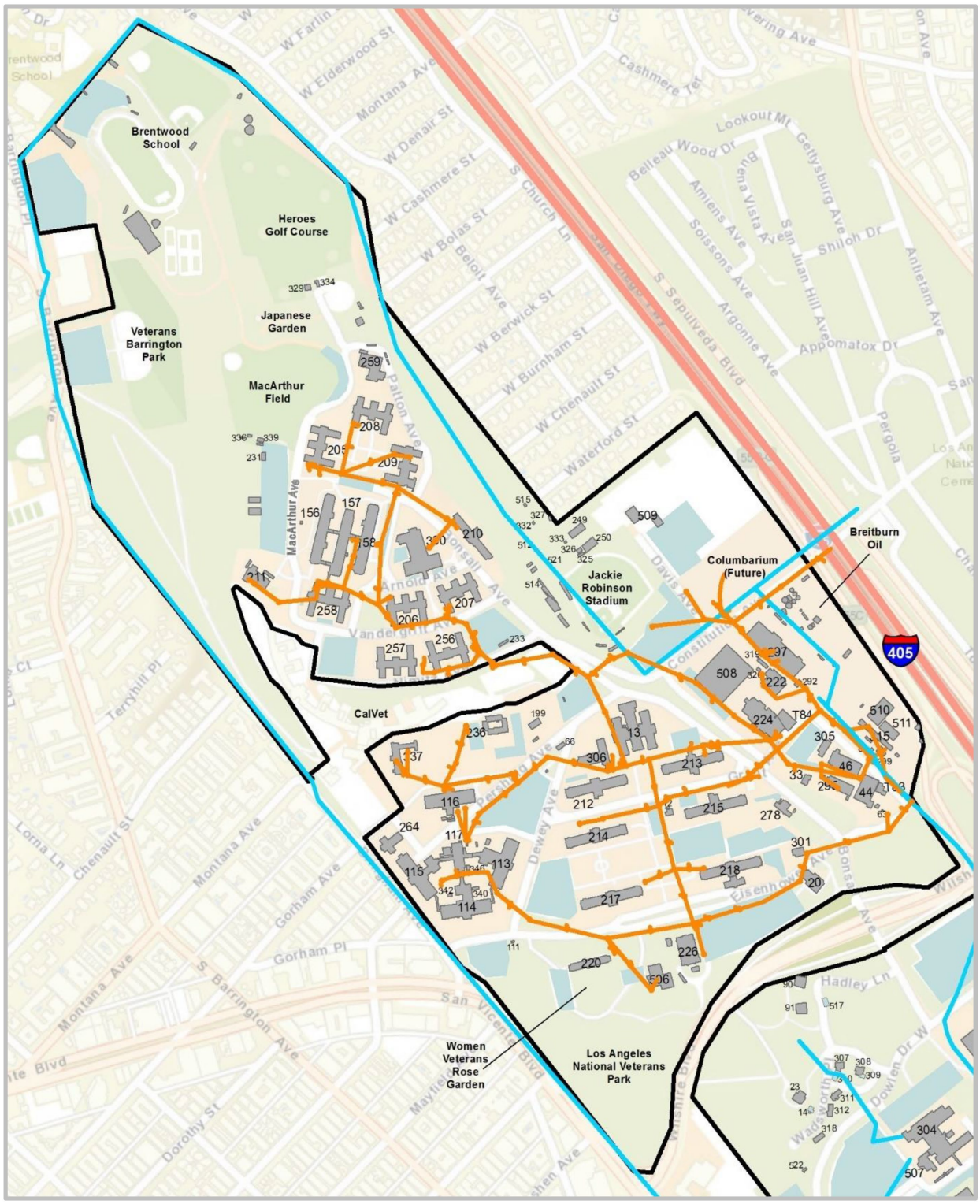
Under the Proposed Action, the private entities would be responsible for obtaining, operating, and maintaining all utility services at the three buildings. Additionally, the private entities would be responsible for installing, maintaining, and operating new physical utility lines for potable water, sanitary sewer, and electric services.

As described in the following subsections, transitioning the responsibility of operating and maintaining utility services from the WLAMC to the private entities would have a less-than-significant adverse impact on stormwater, sanitary sewer, potable water, and the electrical utilities at the WLAMC.

Construction. Prior to construction of the new utility lines, the private entities would coordinate with the WLAMC and each utility provider to confirm the physical location of each utility, develop schedules to avoid conflicts with other projects, and prevent interruptions in service to other utility users at the WLAMC. This coordination and approval process would continue from design engineering until final construction is completed.

Under the Proposed Action, the existing potable water, electric, and sanitary sewer utility lines provided to Buildings 205, 207, and 208 would be replaced by the private sector entities undertaking the development with new lines – independent of VA's existing systems and connections. The new lines would be installed within existing utility corridors and all work would proceed according to the archaeological sensitivity model previously described under Section 3.3.1.

Figure 14. WLAMC Electric Utility Corridors



3.12.3 Environmental Consequences

3.12.3.1 Proposed Action

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As described in the following subsections, transitioning the responsibility of operating and maintaining utility services from the WLAMC to the private entities would have a less-than-significant adverse impact on stormwater, sanitary sewer, potable water, and the electrical utilities at the WLAMC.

Construction. Prior to construction of the new utility lines, the private entities would coordinate with the WLAMC and each utility provider to confirm the physical location of each utility, develop schedules to avoid conflicts with other projects, and prevent interruptions in service to other utility users at the WLAMC. This coordination and approval process would continue from design engineering until final construction is completed.

Under the Proposed Action, the existing potable water, electric, and sanitary sewer utility lines provided to Buildings 205, 207, and 208 would be replaced by the private sector entities undertaking the development with new lines – independent of VA's existing systems and connections. The new lines would be installed within existing utility corridors and all work would proceed according to the archaeological sensitivity model previously described under Section 3.3.1.

For the LADWP potable water utility, new subsurface lateral piping would be extended along the existing utility corridor from the Brentwood main to each of the buildings. For the SCE electrical utility, a new trunk line would be extended from Constitution Avenue at I-405 onto the north campus and then follow the existing underground electrical duct bank along Bonsall Avenue before branching off to each building. For the sanitary sewer utility, new branch laterals would be extended from each building to the existing main beneath Vandergrift Avenue; the existing main would not be replaced as part of the Proposed Action. The VA has confirmed that any potential future extensions of utilities to Buildings 205, 207, and 208 would occur along existing utility corridors. Limiting excavations to areas that are already disturbed minimizes the potential for impacting cultural resources and degrading soil quality.

These new utility lines would address the aforementioned deficiencies in the age, size, and integrity of the existing sanitary sewer pipes; the potential capacity limitations of the existing feeder circuits that serve the north campus from SCE Substation #2; and low pressure and potential insufficient capacity of the existing water lines to support additional demand associated with the rehabilitation of other buildings in the north campus (VA, 2018).

Under the Proposed Action, the steam and natural gas utilities would no longer be provided to Buildings 205, 207, and 209. However, the physical infrastructure would remain in place.

The WLAMC GEMS Coordinator confirmed that similar construction activities to repair or upgrade utility systems and requiring temporary roadway lane closures has not had an adverse impact on traffic or continuity of utility services elsewhere on campus (Mabbett, 2018b). Therefore, construction activities associated with utility upgrades would be anticipated to have a

short-term, direct, negligible adverse impact on utility services within the WLAMC.

Operation. Upgrades to the aforementioned utility network infrastructure associated with Buildings 205, 207, and 208 would provide a direct, long-term, beneficial impact on the quality of utility services provided to future residents at these buildings. The new utility infrastructure would also require less maintenance. The increase in utility demand compared to current conditions would not reduce utility service quality elsewhere within the WLAMC or off-site, because the utility providers have sufficient capacity to meet the negligible increase in demand. Additionally, operation would no longer place a demand on the steam or natural gas utilities.

Therefore, operation of the Proposed Action would have a long-tern, direct, less-than-significant beneficial impact on utility infrastructure.

3.12.3.2 No Action

Under the No Action alternative, Buildings 205, 207, and 208 would remain vacant. No upgrades or changes to the utility infrastructure would be made, and no changes in utility utilization rates would occur at each building. Therefore, no impacts to utilities would occur. Baseline conditions would remain, as described above.

3.13 Transportation and Parking

3.13.1 Existing Environment

3.13.1.1 Transportation

The WLAMC north campus has four entrance points accessible by motor vehicle, bicycle, or pedestrians. The southern entrance is on Bonsall Avenue, which is accessible via Wilshire Boulevard. The eastern entrance is on Constitution Avenue and is accessible from Sepulveda Boulevard. The western entrances to the WLAMC north campus are along Bringham Avenue, on Pershing Avenue and Eisenhower Avenue, and are for emergency use only. The WLAMC is improved with sidewalks, but has no designated bike lanes.

Within the WLAMC, Buildings 205 and 208 are accessible from Bonsall Avenue and Patton Avenue. Building 207 is accessible from Bonsall Avenue, Vandergrift Avenue, and Arnold Avenue.

The WLAMC is served by an extensive system of bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro), Los Angeles Department of Transportation (LADOT), Santa Monica Big Blue Bus ("BBB"), Culver City Bus, and the Antelope Valley Transit Authority. There are 11 bus lines that stop within a "comfortable walking distance" (approximately 0.25 mile) from the Project Study Areas. Of the 11 bus lines, five (5) are walkable from both north and south campus, three (3) are walkable from the north campus, three (3) are walkable from the south campus.

A potential future Los Angeles County Metro Rail Station ("Purple Line VA Station") is conceptually planned near the intersection of Wilshire Boulevard and Bonsall Avenue, approximately 0.5-miles southeast of the Project Study Areas.

Traffic volumes at three intersections leading to the three buildings within the north campus and at three intersections at the WLAMC entrances has been studied (VA, 2018a). Relatively good levels of service (LOS A, B, and C) were present at five of the six intersections. An LOS rating of A, B, or C indicates the roadways have no or few vehicle backups at signaled intersections. The

intersection at the Sepulveda Boulevard and Wilshire Boulevard operated at LOS D (substantial delays during rush hour) during the peak evening rush hour.

The traffic study count in 2017 also determined that 400 vehicles traveled to and from Building 208 at the time when Building 208 was used for a mental health clinic; the building is currently vacant. No traffic was associated with Buildings 205 and 207, as they were vacant when the traffic count analysis was performed in 2017.

3.13.1.2 Parking

A parking inventory and parking utilization survey for the existing parking resources available at the WLAMC north campus was performed in 2017 (VA, 2018b). There are currently 2,130 parking spaces and storage capacity for 192 bicycles in the north campus (Figure 15) (VA, 2018b).

Parking along Bonsall Avenue is generally prohibited, except for the segment between Vandergrift Avenue and Patton Avenue. Parking along Nimitz Avenue is prohibited in the westbound direction, but is permitted along the eastbound curb. Parking along Constitution Avenue is prohibited in both directions, except for some perpendicular parking spaces just east of Davis Avenue.

The following subsections provide specific parking details for each Project Study Area.

Buildings 205 and 208

There is a total of 271 parking spaces provided by six (6) parking lots immediately adjacent to the Building 205 and 208 Project Study Area. The parking lots nearest Buildings 205 and 208 include Lots 27, 28, and 38. These lots can be accessed via Bonsall Avenue and Patton Avenue. In 2017, and prior to becoming vacant, Building 208 had a parking demand of 135 spaces (VA, 2018b).

Building 207

There is a total of 121 parking spaces provided by one (1) parking lot (Lot 48) and street parking along Vandergrift Avenue, immediately adjacent to the Building 207 Project Study Area. A parking demand survey in 2017 determined that between 8 a.m. and 5 p.m. on a weekday, between 31 and 95 cars utilized Lot 48 (31-96% utilization rate) (VA, 2018b).

3.13.2 Environmental Consequences

3.13.2.1 Proposed Action

Construction.

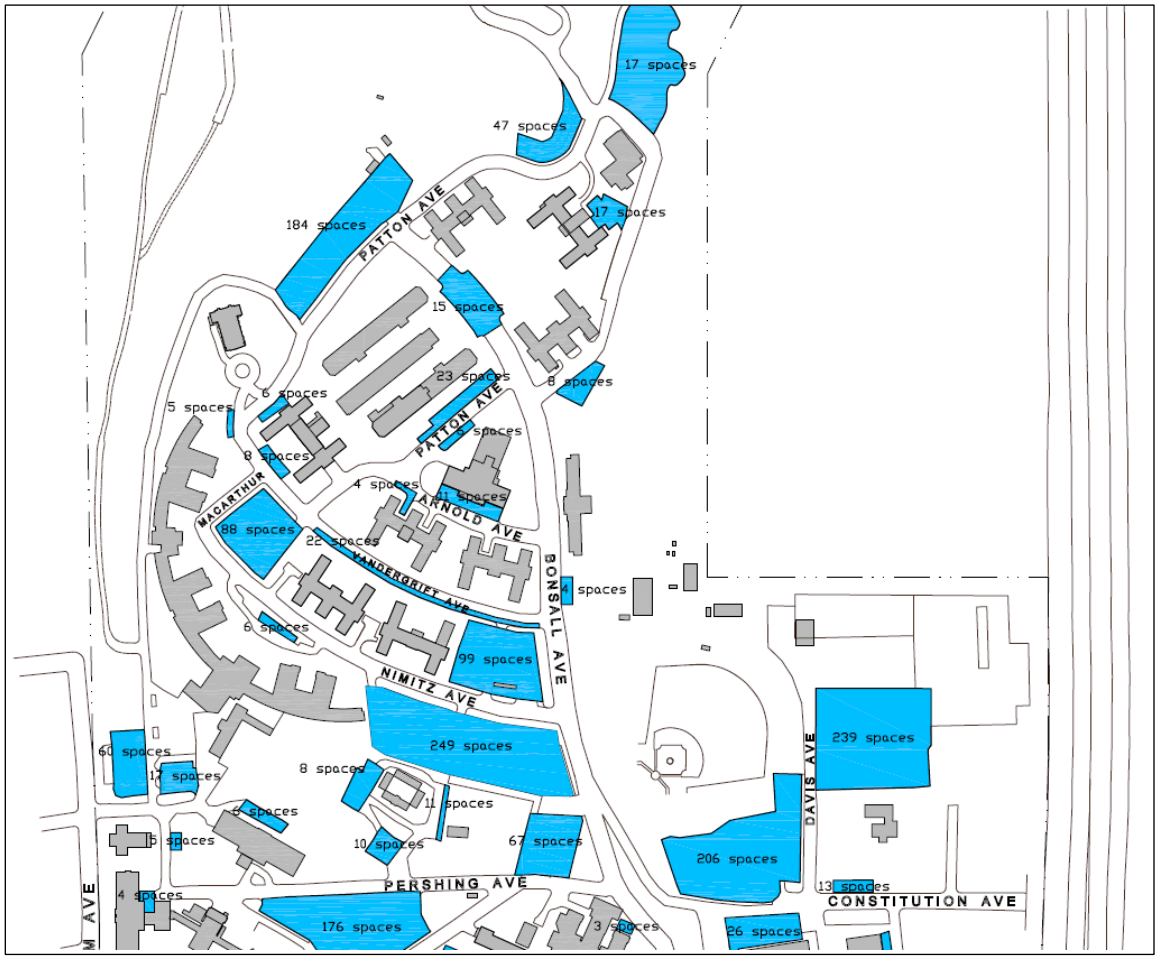
Above-Ground Building Rehabilitations

Construction vehicles traveling to and from the WLAMC would utilize the main entrance at Wilshire Boulevard (Mabbett, 2018b), and then access the Project Study Areas from Bonsall Avenue and Patton Avenue. These roads would not require closing, special permits, or physical modifications to handle the volume or types of construction vehicles traveling to and from the Project Study Areas. The entrance at Sepulveda Boulevard/Constitution Avenue has a height restriction of 15 feet (due to the I-405 overpass) and therefore would be a suitable entry point for only those construction vehicles under this height.

Buildings 205 and 208

Construction vehicles and equipment would be staged in the open area between the north side of Building 205 and the west side of Building 208 (refer to Figure 3). This area has previously been used to stage construction equipment.

Figure 15. Parking Spaces at the WLAMC North Campus



During the construction phase, the parking spaces immediately adjacent to the Project Study Area would remain available to visitors and staff in these areas. If necessary, some spaces in the lot immediately north of Building 208 may be temporarily reserved for use by construction vehicles and/or equipment staging.

Building 207

Construction vehicles and equipment would be staged on the concrete loading dock driveway on the north side of Building 207, entirely avoiding the need to park on the surrounding streets (Figure 4). If needed, construction vehicles/equipment could also be staged within the grounds immediately surrounding Building 207. Because Building 207 is currently vacant, construction activities would not interfere with any parking or transportation routes to other buildings in this area.

Above-Ground Construction Impacts on Transportation and Parking

Construction vehicles mobilizing to and from the Project Study Areas would utilize Bonsall Avenue. These roads would not require closing, special permits, or physical modifications to handle the volume or types of construction vehicles associated with the Proposed Action.

At both Project Study Areas, a gravel construction pad (or other material having a similar function) may be established at the exit of each construction staging area to ensure dirt and debris is removed from construction vehicle tires before those vehicles travel on Bonsall Avenue, Patton Avenue, or Vandergrift Avenue.

Therefore, construction activities associated with building rehabilitations would have a short-term, direct, negligible adverse impact on transportation and parking.

Excavations Along Existing Utility Corridors

Under the Proposed Action, the existing potable water, electric, and sanitary sewer utility lines provided to Buildings 205, 207, and 208 would be replaced with new lines. Access to the utility lines would require excavation along each of the existing utility corridors. A description of the alignment and excavation work for the separate utility corridors is provided in the following subsections.

Utility Construction Impacts on Transportation and Parking

The WLAMC GEMS Coordinator explained that prior excavations of utility corridors along Bonsall Avenue and other roadways typically required closing one lane of traffic during the repair, with no short- or long-term adverse impact on traffic resulting (Mabbett, 2018b).

For the Proposed Action, only a short segment of each utility corridor would be excavated at any one time. Where the utility corridor or lateral passes beneath a roadway, one lane of the roadway would be temporarily closed while the new utility line is installed and the roadway is repaved. Excavations in parking areas are not anticipated.

Therefore, construction associated with utility corridor excavations would have a short-term, direct, less-than-significant adverse impact on transportation, and no impact on parking.

Operation.

Transportation

The transportation impact analysis study determined that operation of the Proposed Action would not decrease the current LOS at any of the six intersections near the Project Study Areas (VA, 2018a). The transportation analysis also estimated projected traffic volumes for the year 2023 based on future operations of the Proposed Action and 50 proposed off-site developments near the WLAMC. The analysis determined that the future operation of the Proposed Action and other proposed projects would not decrease the LOS of these intersections (VA, 2018a).

The transportation impact analysis also projected that on a daily basis between 64 and 76 vehicles would travel to each of the three buildings (for a total daily volume of approximately 216 vehicles) (VA, 2018a). This future operational traffic volume represents a net decrease of approximately 184 vehicles compared to the 400 vehicles that traveled to Building 208 alone in 2017 (the most recent data were available, and when Building 208 was still in use as a mental health clinic) (VA, 2018a).

As a result, operation of the Proposed Action would not impact LOS conditions at any of the intersections, and would result in a net decrease in traffic volume on the north campus roadways leading to each of the three buildings. Therefore, operation of the Proposed Action would have no impact on transportation.

Parking

Buildings 205, 207, and 208 are currently vacant and therefore do not have an associated current parking demand. Once these building are occupied and in use as permanent supportive housing, there would be an increase in parking demand compared to their prior vacant condition. As summarized in Table 11, the existing parking supply associated with each building is greater than the operational demand that is associated with residential use of the buildings, using either empirical rates or those published by the Institute of Transportation Engineers (VA, 2018b). The transportation impact study concluded that this parking supply is expected to meet the City of Los Angeles Municipal Code (LAMC) parking requirements for restricted affordable units and also comply with the LAMC bicycle parking requirements by providing sufficient long-term and short-term bicycle stalls (VA, 2018a). Additionally, the transportation impact analysis determined that operation of the Proposed Action would have no significant impacts on public transit systems (VA, 2018a).

Therefore, operation of the Proposed Action would have no impact on transportation and parking conditions at the Project Study Areas.

Table 11. Operational Parking Demand

Location	Current Parking Supply for this Location	Proposed Residential Units	Peak parking Rate (empirical rate of 0.26 spaces/residential unit)	Project Parking Demand (ITE rate of 0.41 spaces/residential unit)
Building 205 and 208 Project Study Area	271	68 units (Building 205) 54 units (Building 208)	18 (Building 205) 14 (Building 208)	28 (Building 205) 22 (Building 208)
Building 207 Project Study Area	121	50 units	13	21

3.13.2.2 No Action

Under the No Action alternative, the Proposed Action would not be implemented. No changes would occur to current traffic or parking conditions associated with each building. Baseline conditions would remain, as described above.

3.14 Environmental Justice

3.14.1 Existing Environment

Executive Order (EO) 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" was enacted in 1994 to focus federal agency's attention on the environmental and human health conditions in minority communities and low-income communities with the goal of achieving environmental justice. Under this Executive Order, federal agencies must identify and address the human health or environmental effects of its actions on minority and low-income populations.

As previously described under Socioeconomics and Community Services in Section 3.10, Greater Los Angeles has a disproportionate population of veterans who are homeless and living at or below the poverty level.

Based on the U.S. Census 2011-2015 ACS, approximately 17.9% (2,194,536 people) of the population in the GLAHS service area lived at or below the poverty level, compared to 16.3% (6,135,142 people) statewide. The most common racial or ethnic groups living at or below the poverty line identified as Hispanic or Latino (38.4%), Caucasian (28.4%), and non-white races and origins (18.7%).

Of the 131,227 veterans living at or below the poverty level in California, approximately 33,862 (7.8%) were in the GLAHS service area (U.S. Census, 2011-2016 ACS). Throughout California, there were 3,965,884 non-veterans in poverty and 1,425,565 (15.7%) in poverty.

The total population of Los Angeles County was 10,038,388 people in 2017. Of this population, 53.3% identified as White, 48.2% as Hispanic, 19.6% as Other (non-White), 14.1% as Asian, 8.3% as Black or African American, 3.9% as having two or more races, and 0.3% as Native Hawaiian/Pacific Islander (U.S. Census, 2017).

3.14.2 Environmental Consequences

3.14.2.1 Proposed Action

By providing dedicated housing to the homeless and at-risk veteran population, the Proposed Action would have a long-term, significant beneficial impact on low-income and minority veterans in the GLAHS service area. The Proposed Action includes support services to assist veterans to avoid homelessness and increase resiliency and independence; therefore, the Proposed Action is generally anticipated to decrease the number of veterans becoming homeless or returning to homelessness. The Proposed Action would not have an impact on populations of non-veterans or their families relative to income levels, housing, local tax revenues, or other homeless veteran's program community services.

3.14.2.2 No Action

The No Action alternative would result in a disproportionate lack of supportive housing at the WLAMC for homeless or at risk low-income and minority veteran populations in need. The No Action alternative would effectively require the VA to ignore its commitment to provide dedicated housing and homelessness services at the WLAMC to these veteran populations. Therefore, the No Action alternative would cause a direct, long-term, significant adverse impact on environmental justice by failing to address the needs of these minority and low-income populations. Existing baseline conditions would continue or possibly worsen.

3.15 Cumulative Impacts

The CEQ regulations for implementing NEPA (40 CFR Part 1508.7), cumulative impacts are defined as "…the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." Cumulative impacts accumulate over time, from one or more sources, and can result in the degradation of important resources. In general, cumulative impacts are difficult to assess due to the uncertainty associated with foreseeing future actions.

Past activities are those actions that occurred within the geographic scope of cumulative effects that have shaped the current environmental conditions of the project site. For many resource areas, the effects of past actions are now part of the existing environment and are included in the description of the affected environment.

The scope of the cumulative effects analysis involves the timeframe and geographic extent to which effects could be expected to occur, and a description of the resources that could be cumulatively affected. Additionally, cumulative environmental effects of a Proposed Action, or set of actions, may often be manifested only at the cumulative level on selected resources, such as traffic congestion, air quality, noise, biological resources, cultural resources, socioeconomic conditions, utility system capacities, and others.

3.15.1 Projects Considered for Potential Cumulative Impacts

Projects considered for evaluation in this cumulative effects analysis were identified in the Draft Master Plan, the Programmatic EIS, and information provided by VA and WLAMC staff. The selected projects that have a size and scope similar to the Proposed Action include:

- The prior rehabilitation (seismic corrections, physical improvements) and reuse of Building 209 to a residential facility for homeless veterans.
- Repair and/or replacement of existing utilities including stormwater, potable water, sanitary sewer, and electrical services within the north campus of the WLAMC.
- Future projects that involve the rehabilitation of buildings into supportive housing in the immediate vicinity of the Buildings 205, 207, and 208, as separately described in the Draft Master Plan.

As previously described, the concept for the Proposed Action was developed prior to the Draft Master Plan, and the two actions are independent from one another. That is, the Proposed Action has independent utility from potential future projects to provide supportive housing at the WLAMC as described in the Draft Master Plan, which considers implementing future projects under the single "Principal Developer" concept. Considering its earlier timing and independent sequencing, the design for the Proposed Action is well developed. Therefore, implementing the Proposed Action would expedite the VA's ability to begin providing supportive housing to homeless and at-risk veterans at the WLAMC.

As noted above, the Proposed Action would not have a significant adverse impact on any of the resources analyzed in this EA. Should the potential future projects associated with the Draft Master Plan be determined to have significant adverse impacts, the mitigation for those impacts would be implemented during those future actions under the Draft Master Plan.

3.15.2 Effects of Cumulative Actions on the Proposed Action

The construction and operation of the Proposed Action would result in impacts to resources identified in Sections 3.1 through 3.14. These include potential adverse impacts to aesthetics (construction), air quality (construction and operation), soils (construction), hydrology and water quality (construction), noise (construction), wetlands (construction), solid and hazardous wastes (construction and operation), transportation (construction), and selected utilities (construction).

Adverse impacts to these resources would occur at less-than-significant levels, and implementation of the BMPs and impact minimization measures would help to ensure that the intensity and context of the impact to each resource does not increase to a significant adverse level.

Of the above resources, those that have the potential to be cumulatively affected by the Proposed Action, when combined with other past, present, and reasonably foreseeable future projects at the WLAMC, include the utility infrastructure and transportation. The cumulative impacts analysis for these resources is discussed in the following subsections.

Utility Infrastructure

As previously described, under the Proposed Action the private entities would be responsible for obtaining, operating, and maintaining all utility services at the three buildings. Additionally, the private entities would be responsible for installing, maintaining, and operating new physical utility lines for potable water, sanitary sewer, and electric services. Transitioning the responsibility of operating and maintaining utility services from the WLAMC to the private entities would have a less-than-significant adverse impact on stormwater, sanitary sewer, potable water, and the electrical utilities at the WLAMC. The addition of past, present, and foreseeable actions on the WLAMC as it relates to utility conditions is described in the following paragraphs.

As detailed under the Stormwater heading in Section 3.5.1.2, much of the existing stormwater is generally in good condition but is also over 80 years old. Although the Proposed Action would not increase impervious surfaces and the volume of stormwater entering the stormwater network, several of the Draft Master Plan projects, such as new construction in MacArthur Field and Heroes Golf Course, involve construction activities that would convert open grassy areas to impervious surfaces (buildings, roadways, parking areas), resulting in an increase in stormwater volumes. This increased volume could potentially exceed the capacity of the existing stormwater network, resulting in localized flooding where the stormwater cannot be conveyed into the network as fast as it is generated. To avoid this adverse impact, Draft Master Plan projects would be required to comply with EISA Section 438, utilize LID, and install appropriate stormwater management systems, such as underground retention, dry wells, bioretention areas, and permeable pavements. Additionally, VA-related construction activities on the WLAMC would meet the BMPs and erosion and sediment control strategies provided in the VA's Site Development Design Manual.

The addition of past, present, and foreseeable actions on the WLAMC would have a cumulative impact on the potable water utility. In additional to the Proposed Action, other proposed future building retrofits and rehabilitations would require upgrades to the existing water distribution system at the WLAMC. Constraint points in the current water supply system would be identified prior to construction, and service lines with insufficient capacity would be replaced with larger lines. These proposed future projects could also require the installation of water pressure boosters or pump stations to ensure adequate water pressure at repurposed and new buildings. Future projects would also increase water demand, particularly at new residential facilities. To limit this

increase, water conservation measures under VA's 2015 Strategic Sustainability Performance Plan (SSPP) would be implemented to reduce potable water demand. Overall, these projects are expected to produce a minor increase above the current WLAMC water demand, which would be a negligible increase relatively to overall consumption in the Los Angeles region. The LACDWP is anticipated to have suitable capacity available to meet this future increase in demand without decreasing service quality to other customers. The potential upgrades to water lines and connections on the WLAMC would provide an overall beneficial impact during operation of those projects and the Proposed Action. Therefore, cumulative impacts on the potable water utility would remain at below less-than-significant adverse levels.

The addition of past, present, and foreseeable actions on the WLAMC would have a cumulative impact on the sanitary sewer utility. In addition to the Proposed Action, potential future projects would require improvements to the existing sanitary sewer network to support the added potable water demand associated with future building activities. The improvements would require upgrading and replacing existing sewer mains and branch lines to meet the increased demand, because many of the existing sanitary sewer mains, branches, and laterals either exceed design capacity or are near their limits, with age and condition the primary cause for concern (VA, 2018). The potential future projects would result in a significant increase in sanitary sewerage volume compared to current conditions at the WLAMC. However, this increase would be negligible relative to the volume treated by the LACDWP/LASAN in the Los Angeles region. The LACDWP/LASAN is anticipated to have suitable capacity available to meet this future increase in demand without decreasing service quality to other customers. The potential upgrades to sanitary sewer lines would provide an overall beneficial impact during operation of future projects and the Proposed Action. Therefore, cumulative impacts on the sanitary sewer utility would remain at below less-than-significant adverse levels.

The addition of past, present, and foreseeable actions on the WLAMC would have a cumulative impact on the electric utility. As previously described, the Proposed Action would require the private entities to install a new trunk line from the SCE Substation #2 to Buildings 205, 207, and 208. In addition to the Proposed Action, potential future projects would require improvements to the existing electric network to support the added demand associated with future building activities. The proposed future rehabilitations to existing buildings would replace older, energy-intensive systems with more energy-efficient models and implement the VA's SSPP target for a 30% reduction in electric usage. However, a new SCE feeder would be required to meet potential future loads in the north or south campus. Additionally, Substation #2, which currently serves the north campus, only has an additional 2 MW of capacity available and would not be capable of supporting the anticipated increase in new loads. New or expanded electric infrastructure would be required to adequately serve potential future developments at the WLAMC. The potential future electric demand at the WLAMC would be a negligible increase relative to the demand in the Los Angeles region, and SCE (or the LACDWP) is anticipated to have suitable capacity available to meet this future increase in demand without decreasing service quality to other customers. The potential upgrades to the electric utility infrastructure would provide an overall beneficial impact during operation of future projects and the Proposed Action. Therefore, cumulative impacts on the electric utility would remain at below less-than-significant adverse levels.

Parking

The addition of past, present, and foreseeable actions on the WLAMC would have a cumulative impact on parking conditions. Currently, the north campus has 2,130 spaces, but the potential future development under the Draft Master Plan is expected to require 2,682 spaces. However, the Draft Master Plan concepts include the flexibility to provide as many future parking spaces as needed, therefore avoiding a future parking shortage (VA, 2018b). Additionally, prior to implementing potential future phases of the Draft Master Plan, the parking conditions should be monitored to ensure that the parking demand and supply are balanced. Furthermore, the location of future parking should be analyzed to assess whether it is located within a reasonable distance from the primary users and whether an expanded shuttle service should be provided. Therefore, cumulative impacts on parking would remain at below less-than-significant adverse levels.

Transportation

The addition of past, present, and foreseeable actions on the WLAMC would have a cumulative impact on transportation conditions. The operation of the Proposed Action is not anticipated to result in any adverse impacts on transportation. However, the cumulative impacts of the Proposed Action and potential future Master Plan phases are projected to create significant traffic impacts at 22 intersections by 2029. Implementation of potential future projects as contemplated under the Draft Master Plan and being evaluated in a Programmatic EIS would require identification and possible implementation of mitigation measures.

3.15.3 Effects of Cumulative Actions on the No Action Alternative

Under the No Action alternative, the VA would not rehabilitate and repurpose Buildings 205, 207, and 208 as permanent supportive housing for veterans in the GLAHS service area. Instead, the buildings would remain vacant and underutilized, and the VA would not be in compliance with prior commitments and agreements to make effective use of WLAMC facilities to address veteran homelessness. The capacity of supportive housing for homeless and at-risk veterans and their families at the WLAMC would remain unchanged until the potential future development specified under the Draft Master Plan is implemented by the Primary Developer. During this interval, which could be several years, other organizations/programs that provide homeless housing services to veterans could see an increase in demand for assistance.

Under the No Action alternative, physical improvements to Buildings 205, 207, and 208 would not be made, leading to the continued deterioration of the aesthetic appearance and culturally significant elements of each building.

3.16 Potential for Generating Substantial Controversy

The Proposed Action would improve the quality of life for many homeless and at-risk veterans and their families in need of permanent supportive housing in the GLAHS service area. This improvement is anticipated to be perceived positively within both the veteran and non-veteran communities throughout the GLAHS service area. Further, based on the analyses in the previous sections, no major elements or impacts associated with the Proposed Action were identified that are anticipated to generate negative public perception or reaction. Considering these factors, implementing the Proposed Action is not anticipated to generate substantial public controversy.

However, the public is generally anticipated to have a negative reaction if the Proposed Action is not implemented. The VA would likely be perceived as ignoring its mission and prior commitments to provide permanent supportive housing at the WLAMC. The No Action alternative, therefore, is anticipated to generate substantial adverse public controversy.

4. Agency Coordination and Public Involvement

The VA invites public participation in decision-making on new proposals through the NEPA process. Public participation with respect to decision-making on the Proposed Action is guided by 38 CFR Part 26, VA's policy for implementing the NEPA. Additional guidance is provided in VA's Environmental Compliance Management Directive (VA, 2012) and VA's NEPA Interim Guidance for Projects (VA, 2010). Consideration of the views and information of all interested persons promotes open communication and enables better decision-making. Agencies, organizations, and members of the public with a potential interest in the Proposed Action, such as minority, low-income, and disadvantaged persons, are urged to participate. The following sections describe agency coordination and public involvement efforts associated with this Draft EA.

4.1 Federal, State, and Local Agency Coordination

The VA provides federal, state, and local agencies and organizations with an opportunity to comment on the Proposed Action. Specifically, the VA has mailed letters for receipt by October 31, 2018, to agencies and organizations informing them of the availability of the Draft EA and the opportunity to provide comment during a 30-day review period ending on December 1, 2018. Additionally, these agencies and organizations have been invited to attend and provide comments at the public meeting (described in further detail in Section 4.3). All agency and organization comments received during the review period and at the meeting will be documented and addressed in the Final EA. Copies of correspondence to the VA will be included in Appendix A.

4.2 Native American Tribal Coordination

In accordance with 36 CFR 800.2 and EO 13175, Consultation and Coordination with Indian Tribal Governments, dated November 6, 2000, the VA will coordinate with the California Native American Heritage Commission by notifying them of the availability of the Draft EA and to distribute the Draft EA to the appropriate tribal organizations within California. This provides the opportunity for tribal organizations to provide comments on the Proposed Action during the 30-day review period.

All comments received from tribal organizations will be documented and addressed in the Final EA. Copies of all correspondence with tribal organizations will be provided in Appendix A.

4.3 Public Involvement

The VA, as the federal proponent of the Proposed Action, will make the Draft EA available for a 30-day public review and comment period. The start of the comment period and the process to obtain a copy of the Draft EA will be announced in a Notice of Availability (NOA) published in the *Los Angeles Times*, which covers the West Los Angeles region. The Draft EA will be published and available for review in printed format at the WLAMC medical library located on the 6th Floor of the main hospital Building 500, Monday through Friday, 8AM-4PM, and at the Westwood Public Library, 1246 Glendon Ave, Los Angeles, CA 90024, Phone: (310) 474-1739; West Los Angeles Regional Public Library 11360 Santa Monica Blvd, Los Angeles, CA 90025, Phone: (310) 575-8323; Donald Bruce Kaufman – Brentwood Public Library, 11820 San Vicente Blvd, Los Angeles, CA 90049, Phone: (310) 575-8273. Additionally, the draft EA will be available for electronic download from the West Los Angeles Medical Center website at https://www.losangeles.va.gov/index.asp.

Comments received during the 30-day public review will be addressed and documented in the Final EA. Public comments and an affidavit of the NOA will be included in Appendix B.

Additionally, a public meeting will be held during the 30-day public review period at which the VA will describe the Proposed Action and the NEPA process and receive public comments. The VA will announce the details (date, location) of the meeting in the same NOA described above. Comments received during the public meeting will be addressed and documented in the Final EA. A transcript of the public comments and responses made during the meeting will be included in Appendix B.

5. BEST MANAGEMENT PRACTICES and IMPACT MINIMIZATION MEASURES

As described throughout Section 3, the following best management practices, impact minimization measures, required commitments, and monitoring opportunities would maintain the potential impacts from construction and/or operation of the Proposed Action at less-than-significant adverse levels.

AESTHETICS
Construction
• Design and rehabilitate Buildings 205, 208, and 207 consistent with *SOI Standards* to preserve integrity of the historic district.
• Implement dust control measures specified under the Air Quality heading.
• Utilize designated construction staging areas for equipment and materials, and use good housekeeping to maintain the appearance of the area.
• Erect a privacy fence around the construction zone and maintain the existing vegetative buffers around the site border.
Operation
• Professionally maintain landscaped areas with native, non-invasive vegetation.
• Maintain the buildings in a manner that increases the functionality and preserves the integrity of the WLA VA Historic District.
AIR QUALITY
Construction
• Prior to performing rehabilitation activities that may disturb asbestos-containing building materials (based on an asbestos survey completed by a Cal/OSHA certified asbestos consultant), the construction contractors would complete the SCAQMD registration and notification required under Rule 1403. All asbestos-containing materials that may be disturbed would either be avoided or abated by a Cal/OSHA licensed abatement contractor. This management approach would limit potential asbestos emissions from building rehabilitation activities. Additionally, prior to disturbance of building materials containing PCBs or lead-based paint, complete abatement and/or encapsulation according to all applicable federal, state, and local regulations. Only licensed contractors would perform these activities.
• To the extent practicable use newer off-road and on-road construction equipment that meets the latest USEPA or CARB standards.
• Reduce nitrogen oxides, volatile organic compounds (VOCs), and CO from engines rated over 50 bhp by complying with SCAQMD Rule 1110.2 (“Emissions from Gaseous- and Liquid-Fueled Engines”).
• Limit the idling of mobile sources to three minutes.
• Implement dust suppression methods identified in VA Specification *01 57 19: Temporary Environmental Controls,* and in the SCAQMD “Fugitive Dust Mitigation Measures” Tables XI-A through XI-E. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspension of dust-generating activities during sustained high wind conditions (e.g. 10-40 mph with gusts at or above 50 mph).
• Cover all incoming and outgoing haul trucks with tarps to minimize generation of dust and other particulate matter.
• Travel on paved roads within the WLAMC and the vicinity at speeds at or below posted limits. This will minimize dust generated by vehicles and equipment on paved surfaces. On unpaved surfaces, vehicle speeds will be maintained at or below 5 miles per hour to prevent dust generation of exposed soil.
• Stabilize exposed soil to minimize erosion and subsequent dust generation.

• Visually monitor all construction activities on a daily basis, and particularly during extended periods of dry weather; implement additional dust control measures as needed.
CULTURAL RESOURCES
• Apply the *SOI Standards* to all design and construction phases.
• Maintain the buildings appropriately for their continued use and functionality.
• Follow the plan for unanticipated discoveries in the event construction impacts previously unknown archaeological properties.
• Extend utilities through existing corridors and subsurface trenches/duct banks.
GEOLOGY, SOILS, AND TOPOGRAPHY
Construction
• Construct seismic retrofit upgrades at each building according to the LADBS Ordinance 183893.
• Any changes to the existing grade caused by construction activities would be corrected and restored to the original grade by the end of the construction phase.
• For subsurface utility excavations, manage excess soils by containerizing or stockpiling and covering to prevent erosion. Limit length and duration of open excavations to only the area undergoing upgrades. Immediately backfill open excavations and restabilize exposed soils with the original cover material once upgrade work is completed.
• The construction contractors would develop a soil erosion and sediment control (SESC) plan for approval by the VA and prior to conducting any work.
• Install and maintain sedimentation and erosion control measures, including silt fences and water breaks, detention basins, filter fences, sediment berms, interceptor ditches, synthetic straw bales, rip-rap, and/or similar physical control structures.
• Retain on-site vegetation to the maximum extent possible.
• Revegetate disturbed areas as soon as construction is completed. Use native, non-invasive vegetation. Professionally maintain vegetation during operation.
• Implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the Project Study Areas, to reduce the impacts of incidental releases of construction vehicle fluids to soil quality. Report releases of regulated quantities of regulated chemicals to the VA and California Environmental Protection Agency. Perform cleanup according to applicable regulatory requirements.
Operation
• Conduct routine landscaping to ensure soil remains vegetated and stabilized to prevent erosion.
HYDROLOGY AND WATER QUALITY
Construction and Operation
• Prepare a site-specific Stormwater Pollution Prevention Plan as part of the Construction General Permit and implement required BMPs and monitoring to minimize erosion and sedimentation of runoff.
• Comply with EISA Section 438 to the maximum extent technically feasible.
• Incorporate Low Impact Development (LID) to manage stormwater infiltration and quality during operation of the Proposed Action, including stormwater capture, use of bioswales, and using stormwater as irrigation water.
• Implement spill and leak prevention and response procedures as previously described for Soils.

HABITAT AND WILDLIFE
Construction
• Avoid clearing or damaging the existing mature vegetation around the buildings.
• Replace any damaged or removed vegetation with native, non-invasive, drought-resistant varieties.
NOISE
Construction
• Schedule construction activities on weekdays between 7 a.m. and 8 p.m., consistent with noise ordinances from Los Angeles County and the City of Los Angeles to minimize potential impacts to nearby residential areas. Notify the WLAMC at least 24 hours in advance of work that cannot be performed during this period.
• Equip and maintain noise-buffering mufflers on construction equipment and shut down construction equipment when not in use for more than 3 minutes.
• Comply with OSHA requirements to protect hearing of workers around loud construction equipment.
WETLANDS
Construction
• Implement the BMPs specified for Soil and Stormwater.
SOLID WASTE AND HAZARDOUS MATERIALS
Construction
• Prior to rehabilitation, abate, encapsulate, or other manage regulated building materials according to federal, state, and local regulations. Transport and dispose of regulated building materials according to applicable federal, state, and local regulations.
• Segregate, contain, and disposal of construction debris based on its content.
• Recycle or reuse construction debris that does not require landfilling.
Operation
• Manage solid wastes in designated areas and establish routine pickup and disposal to appropriate landfill facilities by qualified vendors.
TRANSPORTATION AND PARKING
Construction
• Schedule construction activities to avoid coinciding with generally increased traffic periods within the WLAMC.
• Stage construction equipment at the site to avoid unnecessarily taking up parking spaces surrounding each building and to avoid blocking adjacent roadways.
• Gravel pads would be established at the exit of the construction areas to ensure dirt is removed from construction vehicle tires before traveling onto campus roadways.
• Limit open excavations of existing utility corridors in roadways to minimize the area and period of roadway lane closure.
UTILITIES
Construction
• Prior to construction, coordinate with the WLAMC and each utility provider to confirm the physical location of each utility, develop schedules to avoid conflicts with other projects, and prevent interruptions in service to other utility users at the WLAMC. Continue coordination from design engineering until final construction is completed.
• Extend new utility lines within existing utility corridors.

6. Regulatory Framework

This EA has been prepared under the provisions of, and in accordance with the NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, and 38 CFR Part 26. In addition, the EA has been prepared as prescribed in VA's NEP Interim Guidance for Projects (VA 2010b). Federal and state laws and regulations specifically applicable to this Proposed Action are specified, where appropriate, within this EA, and include:

- California State Water Resources Control Board (NPDES, Construction General Permit Order 2009-0009-DWQ).
- Coastal Zone Management Act of 1972 and the California Coastal Act of 1976.
- Endangered Species Act (ESA) of 1973, as amended (7 USC 136; 16 USC 1531 et seq.).
- Executive Order 11988, Floodplain Management (24 May 1977).
- Executive Order 11990, Protection of Wetlands (24 May 1977).
- Executive Order 12898, Environmental Justice (11 February 1994).
- Executive Order 13175, Consultation and Coordination with Indian Tribal Governments (06 November 2000).
- Executive Order 13514/Energy Independence Security Act (EISA) Section 438.
- Executive Order (EO) 13693, Planning for Federal Sustainability in the Next Decade (19 March 2015).
- Federal Clean Air Act (CAA) of 1990 (42 USC 7401 et seq., as amended).
- Federal Clean Water Act (Federal Water Pollution Control Act) of 1948, as amended (1972, 1977) (33 USC 1251 et seq.); Sections 401 and 404.
- Mandatory Reporting of Greenhouse Gases Rule (74 FR 56260) (30 October 2009).
- Migratory Bird Treaty Act (MBTA; 16 USC 703-712, 3 July 1918; as amended 1936, 1960, 1968, 1969, 1974, 1978, 1986, and 1989).
- Native American Graves Protection and Repatriation Act, as amended (NAGPRA) (25 USC 3001 et seq.).
- National Historic Preservation Act (NHPA) of 1966, as amended (36 CFR Part 800).
- South Coast Air Quality Management District (SCAQMD) Air Quality Regulations.
- USEPA National Emission Standards for Hazardous Air Pollutants (NESHAP).
- Cal/OSHA, Title 8 §1532.1, Lead OSHA.

7. List of Environmental Permits, Approvals, and Determinations Potentially Required

The following federal or state environmental permits, approvals, or determinations are potentially required as part of this Proposed Action:

1. General Permit for Discharges of Storm Water Associated with Construction Activities Storm Water General Permit (2009-0009-DWQ) (NPDES compliance), including preparation of a SWPPP. Submit an NOI at least seven days prior to the start of construction.
2. Asbestos - NESHAP regulations require the owner or the operator of the rehabilitation or demolition operation to notify the appropriate delegated entity (SCAQMD) before any demolition, or before any rehabilitations of buildings that contain a certain threshold amount of regulated asbestos-containing material. Comply with AQMD Rule 1403.
3. Demonstrate compliance with EISA Section 438 to the maximum extent technically feasible.
4. California Office of Historic Preservation – State Historic Preservation Officer – Adherence to the *SOI Standards* through consultation with the State Historic Preservation Office; such action will not adversely affect historic properties.

8. List of Preparers

U.S. Department of Veterans Affairs

Contractor Staff

The Craddock Group

Mabbett & Associates, Inc.

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S. Abbott, BS	Jr. NEPA Analyst Document Preparation	2
M. Krah, JD	Subject-Matter Expert, Document Preparation	8
H. Bisbee, BA	Senior NEPA Analyst Document Review	12
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10. Glossary

Sources:

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- Glossary of Terms Used in Department of Energy NEPA Documents, http://energy.gov/sites/prod/files/NEPA_Glossary%2008_2011.pdf
- NEPA Glossary, U.S. Fish and Wildlife Service, http://www.fws.gov/r9esnepa/Intro/Glossary.PDF

Aesthetic resources: The components of the environment as perceived through the visual sense only. Aesthetic specifically refers to beauty in both form and appearance.

Affected environment: A portion of the NEPA document that succinctly describes the environment of the area(s) to be affected or created by the alternatives under consideration. Includes the environmental and regulatory setting of the proposed action.

Alternative: A reasonable way to fix the identified problem or satisfy the stated need.

Attainment area: An area that the Environmental Protection Agency has designated as being in compliance with one or more of the National Ambient Air Quality Standards (NAAQS) for sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone, lead, and particulate matter. An area may be in attainment for some pollutants but not for others.

Conformity analysis: The *Clean Air Act* requires the Environmental Protection Agency to promulgate rules to ensure that federal actions conform to the appropriate state implementation plans (SIP) for air quality. Two sets of rules (one for transportation and one for all other actions) developed by USEPA establish the criteria and procedures governing the determination of this conformity. A conformity analysis follows these criteria and procedures to quantitatively assess whether a proposed federal action confirms with the SIP.

Council on Environmental Quality (CEQ): Established by Congress within the Executive Office of the President as part of the *National Environmental Policy Act of 1969*, CEQ coordinates federal environmental efforts and works closely with agencies and other White House offices in the development of environmental policies and initiatives. The Council's Chair, who is appointed by the President with the advice and consent of the Senate, serves as the principal environmental policy adviser to the President. The CEQ reports annually to the President on the state of the environment, oversees federal agency implementation of the environmental impact assessment process, and acts as a referee when agencies disagree over the adequacy of such assessments.

Criteria pollutant: An air pollutant that is regulated by National Ambient Air Quality Standards (NAAQS). Criteria pollutants include sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone, lead, and two size classes of particulate matter, PM10 and PM2.5 New pollutants may be added to, or removed from, the list of criteria pollutants as more information becomes available.

Cumulative effect (cumulative impact): The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

Decibel (dB): A unit for expressing the relative intensity of sounds on a logarithmic scale from zero for the average least perceptible sound to about 130 for the average level at which sound causes pain to humans. For traffic and industrial noise measurements, the A-weighted decibel (dBA), a frequency-weighted noise unit, is widely used. The A-weighted decibel scale corresponds approximately to the frequency response of the human ear and thus correlates well with the loudness perceived by people.

Effects: Effects and impacts, as used in NEPA, are synonymous. Effects include ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions that may have both beneficial and detrimental effects, even if on balance the agency believes that the effect would be beneficial. There are direct effects and indirect effects. Direct effects are caused by the action and occur at the same time and place. Indirect effects are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

Endangered species: Plants or animals that are in danger of extinction through all or a significant portion of their ranges and that have been listed as endangered by the U.S. Fish and Wildlife Service or the National Marine Fisheries Service following the procedures outlined in the *Endangered Species Act* and its implementing regulations.

Environmental assessment (EA): A concise public document for which a federal agency is responsible that serves to briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement (EIS) or a finding of no significant impact; aid an agency's compliance with NEPA when no environmental impact statement is necessary; or facilitate preparation of an EIS when one is necessary. Includes brief discussions of the need for the proposal, of alternatives, of the environmental impacts of the proposed action and alternatives, and a listing of agencies and persons consulted.

Environmental impact statement (EIS): A detailed written statement required by Section 102(2)(C) of NEPA, analyzing the environmental impacts of a proposed action, adverse effects of the project that cannot be avoided, alternative courses of action, short-term uses of the environment versus the maintenance and enhancement of long-term productivity, and any irreversible and irretrievable commitment of resources.

Environmental justice: The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic groups, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies. Executive Order 12898 directs federal agencies to make achieving environmental justice part of their missions by identifying and addressing disproportionately high and adverse effects of agency programs, policies, and activities on minority and low-income populations.

Finding of no significant impact (FONSI): A public document issued by a federal agency briefly presenting the reasons why an action for which the agency has prepared an environmental

assessment has no potential to have a significant effect on the human environment and, thus, would not require preparation of an environmental impact statement.

Floodplain: The lowland and relatively flat areas adjoining inland and coastal waters including flood- prone areas of offshore islands, including at a minimum, that area subject to a one percent or greater chance of flooding in any given year.

Fugitive emissions: Emissions that do not pass through a stack, vent, chimney, or similar opening where they could be captured by a control device. Any air pollutant emitted to the atmosphere other than from a stack. Sources of fugitive emissions include pumps; valves; flanges; seals; area sources such as ponds, lagoons, landfills, and piles of stored material (such as coal); and road construction areas or other areas where earthwork is occurring.

Hazardous material: Any material that poses a threat to human health and/or the environment. Hazardous materials are typically toxic, corrosive, ignitable, explosive, or chemically reactive.

Historic property: Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.

Impacts: see Effects.

Impervious surface: A hard surface area that either prevents or retards the entry of water into the soil or causes water to run off the surface in greater quantities or at an increased rate of flow. Common impervious surfaces include, but are not limited to, rooftops, walkways, patios, driveways, parking lots, storage areas, concrete or asphalt paving, and gravel roads.

National Ambient Air Quality Standards (NAAQS): Standards defining the highest allowable levels of certain pollutants in the ambient air (i.e., the outdoor air to which the public has access). Primary standards are established to protect public health; secondary standards are established to protect public welfare (for example, visibility, crops, animals, buildings).

National Pollutant Discharge Elimination System (NPDES): A provision of the *Clean Water Act* that prohibits discharge of pollutants into waters of the United States unless a special permit is issued by the Environmental Protection Agency, a state, or, where delegated, a tribal government on an Indian reservation.

National Register of Historic Places: The nation's inventory of known historic properties that have been formally listed by the National Park Service (NPS). The National Register of Historic Places is administered by the NPS on the behalf of the Secretary of the Interior. National Register listings include districts, landscapes, sites, buildings, structures, and objects that meet the set of criteria found in 36 CFR 60.4.

No action alternative: The alternative where current conditions and trends are projected into the future without another proposed action.

Particulate matter (PM), PM10, PM2.5: Any finely divided solid or liquid material, other than uncombined (that is, pure) water. A subscript denotes the upper limit of the diameter of particles included. Thus, PM10 includes only those particles equal to or less than 10 micrometers (0.0004 inch) in diameter; PM2.5 includes only those particles equal to or less than 2.5 micrometers

(0.0001 inch) in diameter.

Proposed action: In a NEPA document, this is the primary action being considered. Its impacts are analyzed together with the impacts from alternative ways to achieve the same objective and the required no action alternative, which means continuing with the status quo.

Runoff: The portion of rainfall or irrigation water that flows across ground surface and is eventually returned to streams. Runoff can pick up pollutants from the air or the land and carry them to streams, lakes, and oceans.

Scope: Consists of the range of actions, alternatives, and impacts to be considered in an environmental analysis. The scope of an individual statement may depend on its relationships to other statements (also see tiering).

Scoping: An early and open process for determining the extent and variety of issues to be addressed and for identifying the significant issues related to a proposed action (40 CFR §1501.7). The scoping process helps not only to identify significant environmental issues deserving of study, but also to deemphasize insignificant issues, narrowing the scope of the NEPA process accordingly, and for early identification of what are and what are not the real issues (40CFR §1500.5(d)). The scoping process identifies relevant issues related to a proposed action through the involvement of all potentially interested or affected parties (affected federal, state, and local agencies; recognized Indian tribes; interest groups, and other interested persons) in the environmental analysis and documentation.

Significant: As used in NEPA, requires considerations of both context and intensity. *Context*—significance of an action must be analyzed in its current and proposed short- and long-term effects on the whole of a given resource (for example, affected region). *Intensity*—refers to the severity of the effect.

Solid waste: Non-liquid, non-soluble materials ranging from municipal garbage to industrial wastes that contain complex and sometimes hazardous substances. Solid wastes also include sewage sludge, agricultural refuse, demolition wastes, and mining residues. Technically, solid waste also refers to liquids and gases in containers.

Wetlands: Those areas that are inundated by surface water or groundwater with a frequency sufficient to support, and under normal circumstances do, or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas.

Jurisdictional wetlands are those wetlands protected by the *Clean Water Act*. They must have a minimum of one positive wetland indicator from each parameter (vegetation, soil, and hydrology). The U.S. Army Corps of Engineers requires a permit to fill or dredge jurisdictional wetlands.

APPENDICES

Appendix A – Project Study Area Photos

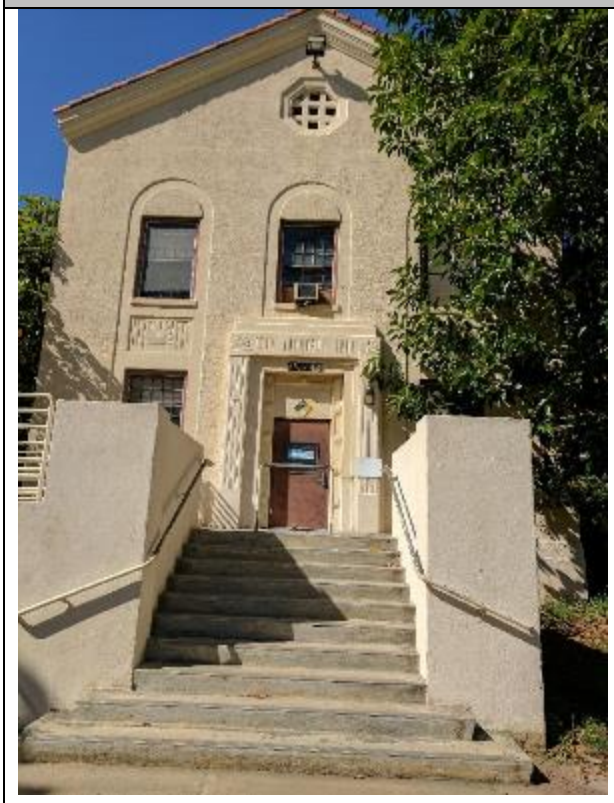
Appendix B – Regulatory Communications

Appendix C – Public Comments

Appendix A – Project Study Area Photos

Building 205	
	South side view of Building 205 (courtyard and Parking Lot No. 27 are east of building)
	East side view and entrance of Building 205 facing courtyard

	Looking northwest at Parking Lot No. 27
	Parking Lot 38 (left of photo), McArthur Field (center of photo) and Building 205 (right of photo)

Building 208	
	Building 208 entrance (south side facing courtyard)
	Building 208 Accessibility Ramp

	Building 208 from north side
	Parking Lot No. 28 (Building 208 is southeast of this parking lot)
	Grassy area northwest of Building 208 (Parking Lot No. 28 is north of this area)

Building 205, 208, and 209 Courtyard	
	Courtyard (Building 208 is located behind the trees)

Building 207	
	Southwest side of Building 207
	Southeast side of Building 207

	West side of Building 207 (right side of photo), south side of Building 300 (center of photo in background), and east side of Building 206 (left side of photo)
	Looking south at Parking Lot No. 48

Appendix B – Regulatory Communications

Appendix C – Public Involvement/Comments