

**FINDING OF NO SIGNIFICANT IMPACT (FONSI)**  
**U.S. DEPARTMENT OF VETERANS AFFAIRS GREATER LOS ANGELES HEALTHCARE SYSTEM**  
**PROPOSED REHABILITATION AND OPERATION OF BUILDINGS 205, 207, AND 208**  
**WEST LOS ANGELES MEDICAL CENTER**  
**LOS ANGELES, CALIFORNIA**

**1.0 Introduction**

The U.S. Department of Veterans Affairs (VA) completed an Environmental Assessment (EA) to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Proposed Action to enter into Enhanced-Use Lease (EUL) agreements with private-sector entities to rehabilitate and operate Buildings 205, 207, and 208, which are currently underutilized and vacant buildings located at VA's West Los Angeles Medical Center (WLAMC), located at 11301 Wilshire Boulevard, Los Angeles, California. The WLAMC is part of VA's Greater Los Angeles Healthcare System (GLAHS).

The EA is attached to this Finding of No Significant Impact (FONSI) document and is incorporated in its entirety by reference. The EA was prepared in accordance with the *National Environmental Policy Act of 1969* ([NEPA]; 42 United States Code [USC] 4321 et seq.), the President's Council on Environmental Quality (CEQ) *Regulations Implementing the Procedural Provisions of NEPA* (40 Code of Federal Regulations [CFR] Parts 1500-1508), VA's NEPA implementing regulations, 38 CFR Part 26, *Environmental Effects of the Department of Veterans Affairs Actions*, and VA's NEPA Interim Guidance for Projects (VA, 2010).

To combat the large, increasing populations of homeless Veterans in Greater Los Angeles, VA developed conceptual design plans in 2013 for the rehabilitation and reuse of Buildings 205, 207, and 208. Efforts to analyze the potential environmental and historic impacts of this action were initiated at that time, prior to VA's development of the separate WLAMC Draft Master Plan in 2016, which outlined the long-term plan to help VA achieve its goal to revitalize the WLAMC campus to be more Veteran focused. Consistent with the 2016 Draft Master Plan, environmental review of the Proposed Action for Buildings 205, 207, and 208 proceeded apart from the PEIS because this Proposed Action was initiated prior to the WLAMC Draft Master Plan.

According to VA's National Center for Veterans Analysis and Statistics, approximately 417,183 Veterans live in the GLAHS service area. Of these, approximately 294,652 live in Los Angeles County and 40% did not have a permanent place to live when leaving the military. In 2017, Los Angeles County had the highest rate (76.1%) of unsheltered homeless Veterans in the country. One of the largest contributing factors to the high rate of Veteran homelessness in Greater Los Angeles is the lack of available affordable housing.

**2.0 Description of the Proposed Action**

Under the Proposed Action described in the EA, VA would use its authority to enter into EUL agreements with private-sector entities who would make seismic retrofits, utility upgrades, rehabilitate interior and exterior elements, and repurpose Buildings 205, 207, and 208 to provide approximately 186 units of housing dedicated to homeless and at-risk Veterans and their families. As contributing resources to the West Los Angeles Veterans Affairs Historic District, the proposed rehabilitations to Buildings 205, 207, and 208 would be accomplished in consultation with the California State Historic Preservation Office (SHPO). Additionally, VA intends to utilize the Secretary of the Interior's *Standards for Rehabilitation (SOI Standards)* (36 CFR 67) to avoid adverse effects to historic resources. Following rehabilitation, the private-sector entities would operate and maintain the housing facilities at Buildings 205, 207, and 208 under the long-term EULs.

The **purpose** of the Proposed Action is to enable VA to provide permanent supportive housing for homeless and at-risk Veterans and their families at the WLAMC.

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

### **3.0 Alternatives Considered**

In addition to the Proposed Action described above, VA evaluated a No Action Alternative as required under NEPA Regulations (40 CFR 1502.14). The No Action Alternative provides a comparative baseline against which the effects of the Proposed Action were evaluated. Under the No Action Alternative, 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. The No Action Alternative would not increase the number of housing units at the WLAMC dedicated for homeless and at-risk Veterans and their families, thereby placing an undue burden on underserved Veterans in need of permanent housing in Greater Los Angeles. Therefore, the No Action Alternative would not meet the purpose and need for action.

### **4.0 Summary of Potential Environmental Impacts Associated with the Proposed Action**

The environmental consequences associated with implementing the Proposed Action are summarized below and discussed in detail in Section 3.0 of the EA. As documented in the EA, VA concludes that implementing the Proposed Action would not result in significant adverse impacts, considered individually or cumulatively, to any of the resources analyzed in the EA.

The Proposed Action incorporates Best Management Practices (BMPs) to ensure the intensity and context of potential adverse impacts to the aforementioned resources do not increase to a significant adverse level. The BMPs and impact minimization measures recommended for each environmental resource are described in Section 5.0 of the EA and are summarized in Appendix A of this FONSI.

The following subsections summarize the anticipated adverse or beneficial impacts associated with construction and operation of the Proposed Action on each of the resources analyzed in the EA.

**Aesthetics.** Short-term, direct, less-than-significant adverse impact from temporary presence of construction equipment and unfinished stages of building rehabilitation. Receptors limited to visitors and staff present at other WLAMC buildings and areas located adjacent to the three buildings. Minor beneficial impact during operation, due to improved appearance of buildings' exteriors carefully rehabilitated per SOI *Standards*.

**Air Quality.** Short-term, direct, less-than-significant adverse impact from emissions of criteria pollutants generated by off-road and on-road construction equipment and workers' vehicles. Emissions would be below General Conformity *de minimis* levels. Rehabilitation activities would disturb building surfaces containing regulated building materials. BMPs and regulatory compliance would prevent the release of these materials as particulates into the air. BMPs would also be implemented to minimize soil exposure and generation of airborne dust. No impact during operation.

**Cultural Resources.** Short-term, direct, less-than-significant adverse impact on the West Los Angeles Veterans Affairs Historic District while buildings are temporarily enclosed by scaffolding during rehabilitation. Temporary adverse impacts would not require removal of the buildings from the historic district or affect the overall historic character of the district. Construction would 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. Rehabilitations would be consistent with SOI *Standards*. Subsurface utility improvements would occur within existing

utility corridors and areas with previously disturbed soils to avoid archaeological properties. Additionally, the Archeological Sensitivity Model shall be utilized for unanticipated discoveries in the event construction impacts previously unknown archaeological properties. Operation would have a long-term, direct, minor beneficial impact to Buildings 205, 207, and 208, as the buildings would have been physically rehabilitated, improved, and strengthened, thereby increasing the longevity of use and maintaining the integrity of the historic district.

**Geology, Topography, and Soils.** No impact on geology. Negligible impact on topography from localized regrading around buildings to direct stormwater away from building foundations. Potential for erosion of soil exposed during construction would be avoided by implementing erosion and sedimentation controls and designated parking/staging areas for vehicles and equipment. Soils would be revegetated at the end of the construction phase to prevent erosion during the operational phase.

**Hydrology and Water Quality.** No water bodies are present; therefore, there would be no impact to surface water quality. No impact to groundwater. Potential for construction activities to generate sediment-laden stormwater runoff to reach the arroyo located at the western boundary of the WLAMC would be minimized by installing engineered barriers to trap sediment (silt fence, straw bales) before stormwater migrates beyond the construction area. Operation would have a long-term, direct, less-than-significant beneficial impact on stormwater quality at each of the three buildings by diverting stormwater into a collection basin, filtration through bioswales, and using it to irrigate landscaping around each building.

**Wildlife and Habitat.** No listed flora or fauna present. Negligible impact to existing urban species and habitat during construction or operation.

**Noise.** Short-term, direct, less-than-significant adverse impact from noise generated by construction equipment and vehicles while traveling within the WLAMC to and from the construction sites during the approximately 24-month construction period. Receptors to noise generated from rehabilitations at Buildings 205 and 208 include residents, visitors, and staff at adjacent Building 209 and in nearby buildings 156, 157, 158, and 259. Receptors to noise generated from rehabilitations at Building 207 include nearby receptors in Buildings 206, 256, and 300. No impact during operation.

**Land Use.** No impact during construction or operation on land at or in immediate vicinity of the buildings or the WLAMC. Repurposing of the buildings is consistent with their intended use for Veterans' benefits programs.

**Floodplains, Wetlands, and Coastal Zone Management.** The three buildings are outside of the 100-year floodplain and coastal zone management zone; therefore, there would be no impact to these resources. While wetlands are not present at the building sites, any potential negligible adverse impact to the arroyo wetland on the western border of the WLAMC would be avoided during construction by implementing stormwater BMPs to capture and remove sediment before stormwater migrates beyond the construction site. Sediment traps would also be placed over storm drains that discharge to the arroyo. No impact during operation.

**Socioeconomics and Community Services.** Short-term, localized, minor beneficial impact from hiring local construction workers and purchasing materials and supplies from local vendors. Operation would have a long-term, significant beneficial impact by providing permanent supportive housing to homeless and at-risk Veterans and their families in Greater Los Angeles.

**Solid Waste and Hazardous Wastes.** Potential for short-term, direct, minor adverse impacts during rehabilitation of buildings would be avoided by handling, managing, and disposing of any regulated building materials (asbestos, lead-based paint, and polychlorinated biphenyls) according to BMPs, regulatory requirements and permit conditions specified by federal, state, and local regulations, including

containment, dust suppression, and respiratory and contact protections for workers. Excess construction debris would be recycled or reused to the maximum extent practicable. During operation, solid wastes would be segregated for disposal or recycling. Operation annual waste volume would account for less than 0.001% of waste generated statewide.

**Utilities.** Short-term, negligible, adverse impact on utilities during upgrades should temporary outages be required while the private-sector entities replace existing utility laterals with new laterals between mains and the three buildings for potable water, sanitary sewer, electric (via the new SCE trunk line), and natural gas. The developer of Building 207 may upgrade the sewer main closest to Building 207 as a corrective action to address an overcapacity issue. Subsurface utility work would occur within existing utility corridors to avoid impacts to cultural resources. Operation would have a long-term, direct, minor beneficial impact on utilities due to new utility laterals, reducing the burden on existing VA utility systems, as well as increased energy efficient building upgrades and operation and maintenance of laterals by the private-sector entities. There would also be a negligible beneficial impact from discontinuing steam service from the WLAMC steam plant to the three buildings.

**Transportation and Parking.** Short-term, direct, less-than-significant adverse impact on transportation should temporary road or lane closures within the WLAMC would be required to complete improvements to subsurface utility lateral lines for potable water, electric, natural gas, and sanitary sewers. Where the utility passes beneath a roadway, the road segment or lane may be temporarily closed while the new utility lateral is installed and when the roadway is repaved. To minimize impacts, only short segments of each utility corridor would be excavated at any one time. No impact to transportation during operation, as confirmed by a site-specific traffic study based on full occupancy of 186 units, and no impact on parking during construction or operation.

**Environmental Justice.** No impact during construction. Operation would have long-term, significant beneficial impact on low-income and minority Veterans in the GLAHS service area. Operation would not adversely impact populations of non-Veterans or their families relative to income levels, housing, local tax revenues, or other homeless Veteran's program community services.

### **Cumulative Impacts**

The EA identified past, present, and reasonably foreseeable future actions at WLAMC and evaluated whether these actions would have a cumulative impact in combination with impacts associated with the Proposed Action. The EA concluded that cumulative impacts could occur to the following resources.

**Utility Infrastructure.** The 2016 Draft Master Plan proposes projects that convert open grassy areas in the north campus to impervious surfaces, resulting in an increase in stormwater volume. This increased volume could potentially exceed the capacity of the existing stormwater network, resulting in localized flooding where excess stormwater cannot be conveyed into the storm drain network as fast as it is generated. Proposed future projects could also increase demand for potable water, sanitary sewer, electric, and natural gas service, potentially exceeding the existing infrastructure capability. These potential cumulative adverse impacts would be minimized by improving the utility infrastructure; replacing older, energy-intensive systems with more energy-efficient models; implementing VA's SSPP target for a 30% reduction in electric usage; and coordinating these improvements between the private-sector entities and utility providers. Cumulative increased demands on all utilities are anticipated to be negligible relative to the overall demand in the Los Angeles region.

**Transportation and Parking.** Potential future development at the WLAMC associated with the WLAMC 2016 Draft Master Plan is projected to create traffic impacts. Mitigation for these traffic impacts is currently addressed in the Draft PEIS for the 2016 Draft Master Plan published for comment in December 2018. Currently, the north campus has 2,130 parking spaces, but the potential future development under the 2016 Draft Master Plan is expected to require 2,682 parking spaces. However, the 2016 Draft Master

Plan concepts include the flexibility to provide as many future parking spaces as needed, therefore avoiding a future parking shortage, thereby avoiding cumulative impacts.

### **5.0 Agency and Public Review and Comment**

VA involved regulatory agencies and the public in decision-making for this Proposed Action. A Notice of Availability (NOA) was published on October 31, 2018, and November 3, 2018, in the *Los Angeles Times* to inform the public of Draft EA release and the 30-day comment period. The Draft EA was available for review at the WLAMC medical library; Westwood Public Library; West Los Angeles Regional Public Library; Donald Bruce Kaufman – Brentwood Public Library; and at the West Los Angeles Medical Center website [www.westladraftmasterplan.org/documentation](http://www.westladraftmasterplan.org/documentation). The NOA also invited the public to attend VA's meeting about the Proposed Action held at the WLAMC on November 13, 2018. Additionally, VA mailed letters to relevant federal, state, and local governmental agencies and community groups to notify them of the release of the Draft EA, the 30-day review period, and the meeting.

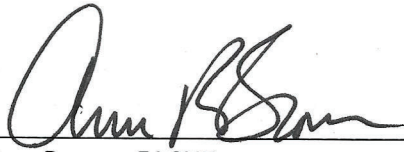
No comments were received from regulators during the 30-day review period. Written comments received from the Brentwood Homeowners Association (BHA) indicated their strong support for development of the WLAMC for housing and services for homeless Veterans. The comments also requested clarification regarding the scope of development analyzed in the Draft EA and its relationship to wider development described in the 2016 Draft Master Plan and PEIS; why the Proposed Action involved rehabilitation of Buildings 205, 207, and 208, rather than demolition and new construction; and the status of traffic studies and responsibilities for the future road network at the WLAMC.

Following release of the Draft EA and completion of the 30-day review period, the private-sector entities responsible for the rehabilitations determined that several of the original design elements described and analyzed in the Draft EA required modifications, including increasing the number of units from 172 to 186, utilizing natural gas to power boilers, and making improvements to selected segments of the sanitary sewer main. Accordingly, VA prepared a Revised Draft EA to describe and document the potential impacts associated with these modifications. Additionally, the Revised Draft EA included responses to BHA's comments on the Draft EA. The Revised Draft EA was released for a 15-day review period, announced by the publication of a NOA in the *Los Angeles Times* on March 15 and 19, 2019. The Revised Draft EA was available for review in the same locations as the Draft EA.

Responses to comments on the Revised Draft EA have been addressed and included in the Final EA. The comments received were considered prior to a decision being made on whether or not to implement the Proposed Action.

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

As a result of the analysis of impacts presented in the Final EA, summarized and incorporated by reference herein, it is the conclusion of VA that, with the implementation of appropriate BMPs, minimization, and regulatory compliance measures included as Appendix A in this FONSI, the Proposed Action would not generate significant public controversy and would have no significant impact of an adverse nature on the quality of the natural or human environment within the meaning of Section 102(2)(C) of the *National Environmental Policy Act of 1969*. Therefore, per the NEPA, the CEQ regulations, and 38 CFR Part 26, I am signing this FONSI, and preparation of an Environmental Impact Statement for the Proposed Action is not required.



Ms. Ann Brown, FACHE  
Director, West Los Angeles Medical Center

4/4/19

Date

Glenn M. Elliott  
689970

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Elliott 689970  
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Mr. Glenn Elliott, Senior PP/M  
Environmental Officer  
VA Construction and Facilities Management Office

Date

**APPENDIX A**

**Best Management Practices, Environmental Avoidance and Protection Measures, and Regulatory Compliance Measures Incorporated into the Proposed Action**

<b>AESTHETICS</b>
<b>Construction</b>
<ul style="list-style-type: none"> <li>Design and rehabilitate Buildings 205, 208, and 207 consistent with SOI <i>Standards</i> to preserve integrity of the National Register historic district as noted under the cultural heading.</li> </ul>
<ul style="list-style-type: none"> <li>Implement dust control measures specified under the Air Quality heading.</li> </ul>
<ul style="list-style-type: none"> <li>Utilize designated construction staging areas for equipment and materials, and use good housekeeping to maintain the appearance of the area.</li> </ul>
<ul style="list-style-type: none"> <li>Erect a privacy fence around the construction zone and maintain the existing vegetative buffers around the site border.</li> </ul>
<b>Operation</b>
<ul style="list-style-type: none"> <li>Professionally maintain landscaped areas with native, non-invasive vegetation.</li> </ul>
<ul style="list-style-type: none"> <li>Maintain the buildings in a manner that increases the functionality and preserves the integrity of the WLA VA Historic District.</li> </ul>
<b>AIR QUALITY</b>
<b>Construction</b>
<ul style="list-style-type: none"> <li>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 South Coast Air Quality Management District (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 be allowed to perform these activities.</li> </ul>
<ul style="list-style-type: none"> <li>Use Tier 4-compliant engines to reduce emissions of particulate matter and nitrogen oxides to meet emission standards established by USEPA and the California Air Resources Board (CARB).</li> </ul>
<ul style="list-style-type: none"> <li>Reduce nitrogen oxides, volatile organic compounds (VOCs), and Carbon Monoxide (CO) from engines rated over 50 BHP by complying with SCAQMD Rule 1110.2 (“Emissions from Gaseous- and Liquid-Fueled Engines”).</li> </ul>
<ul style="list-style-type: none"> <li>Limit the idling of mobile sources to three minutes.</li> </ul>
<ul style="list-style-type: none"> <li>Implement dust suppression methods identified in VA Specification <i>01 57 19: Temporary Environmental Controls</i>, 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 (10-40 mph with gusts at or above 50 mph).</li> </ul>
<ul style="list-style-type: none"> <li>Cover all incoming and outgoing haul trucks with tarps to minimize generation of dust and other particulate matter.</li> </ul>
<ul style="list-style-type: none"> <li>Travel on paved roads within the WLAMC and the vicinity at speeds at or below posted limits to minimize dust generated by vehicles traveling on paved surfaces. On unpaved surfaces, vehicle speeds will be maintained at or below 5 mph to prevent dust generation from exposed</li> </ul>

soil.
<ul style="list-style-type: none"> <li>Stabilize exposed soil to minimize erosion and subsequent dust generation.</li> <li>Visually monitor all construction activities on a daily basis, and particularly during extended periods of dry weather; implement additional dust control measures as needed.</li> </ul>
<b>CULTURAL RESOURCES</b>
<ul style="list-style-type: none"> <li>Apply the SOI <i>Standards</i> to all design and construction phases.</li> <li>Maintain the buildings appropriately for their continued use and functionality.</li> <li>Follow the Archeological Sensitivity Model (ASM) for unanticipated discoveries in the event construction impacts previously unknown archaeological properties.</li> <li>Extend utilities through existing corridors and subsurface trenches/duct banks.</li> </ul>
<b>GEOLOGY, SOILS, AND TOPOGRAPHY</b>
<b>Construction</b>
<ul style="list-style-type: none"> <li>Construct seismic retrofit upgrades at each building according to the Los Angeles Department of Building and Safety (LADBS) Ordinance 183893.</li> <li>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.</li> <li>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.</li> <li>The construction contractors would develop a soil erosion and sediment control (SESC) plan for approval by VA and prior to conducting any work.</li> <li>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.</li> <li>Retain on-site vegetation to the maximum extent possible.</li> <li>Revegetate disturbed areas as soon as construction is completed. Use native, non-invasive, vegetation. Professionally maintain vegetation during operation.</li> <li>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 VA and California Environmental Protection Agency. Perform cleanup according to applicable regulatory requirements.</li> </ul>
<b>Operation</b>
<ul style="list-style-type: none"> <li>Conduct routine landscaping to ensure soil remains vegetated and stabilized to prevent erosion.</li> </ul>
<b>HYDROLOGY AND WATER QUALITY</b>
<b>Construction and Operation</b>
<ul style="list-style-type: none"> <li>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.</li> <li>Comply with EISA Section 438 to the maximum extent technically feasible.</li> <li>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.</li> <li>Implement spill and leak prevention and response procedures as previously described for Soils.</li> </ul>



<b>HABITAT AND WILDLIFE</b>
<b>Construction</b>
<ul style="list-style-type: none"> <li>• Avoid clearing or damaging the existing mature vegetation around the buildings.</li> <li>• Replace any damaged or removed vegetation with native, non-invasive, drought-resistant varieties.</li> </ul>
<b>Operation</b>
<ul style="list-style-type: none"> <li>• Professionally maintain landscaped vegetation.</li> </ul>
<b>NOISE</b>
<b>Construction</b>
<ul style="list-style-type: none"> <li>• 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.</li> <li>• Equip and maintain noise-buffering mufflers on construction equipment and shut down construction equipment when not in use for more than 3 minutes.</li> <li>• Comply with OSHA requirements to protect hearing of workers around loud construction equipment.</li> </ul>
<b>WETLANDS</b>
<b>Construction</b>
<ul style="list-style-type: none"> <li>• Implement the BMPs specified for Soil and Hydrology and Water Quality.</li> </ul>
<b>SOLID WASTE AND HAZARDOUS MATERIALS</b>
<b>Construction</b>
<ul style="list-style-type: none"> <li>• Prior to rehabilitation, abate, encapsulate, or otherwise 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.</li> <li>• Segregate, contain, and dispose of construction debris based on its content.</li> <li>• Recycle or reuse construction debris that does not require landfilling.</li> </ul>
<b>Operation</b>
<ul style="list-style-type: none"> <li>• Manage solid wastes in designated areas and establish routine pickup and disposal to appropriate landfill facilities by qualified vendors.</li> </ul>
<b>TRANSPORTATION AND PARKING</b>
<b>Construction</b>
<ul style="list-style-type: none"> <li>• Schedule construction activities to avoid coinciding with generally increased traffic periods within the WLAMC.</li> <li>• Stage construction equipment at the site to avoid unnecessarily taking up parking spaces surrounding each building and to avoid blocking adjacent roadways.</li> <li>• 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.</li> <li>• Limit open excavations of existing utility corridors in roadways to minimize the area and period of roadway lane closure.</li> </ul>
<b>UTILITIES</b>
<b>Construction</b>
<ul style="list-style-type: none"> <li>• 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.</li> </ul>

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| <ul style="list-style-type: none"><li>• Extend new utility line laterals within existing utility corridors or previously disturbed grounds.</li></ul>                                                                                                         |
| <ul style="list-style-type: none"><li>• The developer of Building 207 would address a potential overcapacity issue for the segment of the sewer main closest to Building 207 by a corrective action that may include an upgrade to this sewer main.</li></ul> |