FINAL

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
810 Vermont Avenue, NW
Washington, DC 20420

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EXECUTIVE SUMMARY AND CONCLUSIONS

The U.S. Department of Veterans Affairs (VA) has completed the Final Environmental Assessment (EA) that analyzed and documented the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's Proposed Action to enter into Enhanced-Use Lease (EUL) agreements with private-sector entities 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).

A Draft EA was released to regulatory agencies and the public for comment during a 30-day review period beginning on November 1, 2018. Comments received from the public were not in opposition to the Proposed Action. However, following the conclusion of the 30-day review period, several elements of the Proposed Action originally described in the Draft EA were modified by the private-sector entity developers. These modifications included an increase in the estimated number of housing units at Building 207 from 50 to 64, raising the total number of units for all three buildings from 172 to 186, and including the use of natural gas as an energy source by extending this utility to each of the three buildings. Additionally, a new traffic study was performed to analyze the impact of the increased number of housing units. Thus, VA prepared a Revised Draft EA to reflect and analyze the updated Proposed Action design elements. The Revised Draft EA was released to regulatory agencies and the public for comment during a 15-day review period beginning on March 15, 2019. No public comments were received on the Revised Draft EA. Comments from Los Angeles Department of Transportation (LADOT) concurred with the findings of the updated traffic study based on proposed occupancy of 186 units.

Under the Proposed Action, three currently underutilized and vacant buildings, Buildings 205, 207, and 208, would be rehabilitated to provide approximately 186 units of housing to Veterans—particularly Veterans who are chronically homeless, severely disabled, women, and the elderly. 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 VA end Veteran homelessness in Greater Los Angeles, and VA's 2016 Draft Master Plan to provide bridge and permanent supportive housing and services for underserved Veteran populations at the WLAMC.

The ***purpose*** of the Proposed Action is to enable VA to provide permanent supportive housing for at-risk and homeless 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 also the 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***, 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 Code of Federal Regulations 67) at Buildings 205, 207, and 208, and repurpose these currently vacant buildings into approximately 186 units of

housing for homeless and at-risk Veterans and their families. Approximately 68 units would be provided in Building 205, 64 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. The Proposed Action meets the purpose and need by providing 186 units of housing for homeless and at-risk Veterans and their families in Greater Los Angeles.

- Under the **No Action** alternative, VA would not enter into 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. The No Action alternative is not consistent with 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 rehabilitated per SOI *Standards*.	Minor, long-term adverse impact, as building conditions deteriorate 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 deteriorate due to deferred investment.
Geology, Topography, and Soils	No impact on geology. Potential for erosion of soil exposed during construction to be minimized by implementing erosion and sedimentation controls. No impact during operation, as soils would be revegetated to prevent and avoid erosion. Negligible impact on topography from localized regrading around buildings to direct stormwater away from foundations.	No impact.
Hydrology and Water Quality	No water bodies are present; therefore, no impact to surface water quality. No impact on stormwater quality during construction due to installation of engineered barriers to trap sediment. Minor, long-term beneficial impact on stormwater quality due to collection, filtration through bioswales, and use as irrigation water during operation.	No impact.

Resource / Issue	Proposed Action	No Action
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.
Floodplains, Wetlands, and Coastal Zone Management	The project site contains no wetlands and is outside of floodplains and the Coastal Zone Management Zone.	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 Waste and Hazardous Materials	No impact. Potential adverse impact from release of regulated building materials (asbestos, lead, and polychlorinated biphenyls) to the environment during construction would be avoided by permit compliance and best management practices including containment, dust suppression, and protections for workers.	No impact.
Utilities	Negligible, short-term adverse impact on utilities during construction upgrades. Negligible beneficial impact from discontinuing steam service during operation. Minor, long-term beneficial impact during operations due to increased energy efficiency of building upgrades and new utility lateral distribution infrastructure. Long-term, negligible adverse impact on utility provider capacities or service quality to other customers.	No impact.
Transportation and Parking	Short-term, less-than-significant adverse impact from temporary road or lane closures during utility upgrades.	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.

Resource / Issue	Proposed Action	No Action
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 other past, present, 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 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 VA's goal to provide housing for the homeless at the WLAMC.

The analyses presented in the Draft and Revised Draft EAs provide sufficient evidence and analysis for VA to determine that the Proposed Action would not cause significant environmental impacts on the environmental resources presented herein. Thus, VA concludes that an Environmental Impact Statement (EIS) is not warranted and has prepared a finding of no significant impact (FONSI) (40 CFR 1508.9). VA has published a Notice of Availability (NOA) in the *Los Angeles Times* to announce the release of the Final EA and FONSI.

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ACRONYMS AND ABBREVIATIONS

$\mu g/m^3$	micrograms per cubic meter
ACS	American Community Survey
amsl	above mean sea level
ASM	archaeological sensitivity model
BHA	Brentwood Homeowners Association
BHP	brake horsepower
BMP	best management practice
CA	California
CAA	Clean Air Act
CAAQS	California ambient air quality standards
CARB	California Air Resources Board
CCC	California Coastal Commission
CEQ	Council on Environmental Quality
CFH	cubic feet per hour
CFR	Code of Federal Regulations
CGP	construction general permit
CMZ	Coastal Management Zone
CO	carbon monoxide
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
EUL	enhanced-use lease
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 gas
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
ITE	Institute of Transportation Engineers
kVA	kilovolt-ampere
kW	kilowatt
LA	Los Angeles
LACFCD	Los Angeles County Flood Control District
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
LAMC	City of Los Angeles Municipal Code
LASAN	City of Los Angeles Sanitation
LID	low-impact development
LOS	level of service
MBTA	Migratory Bird Treaty Act
mph	miles per hour
MWh	megawatt--hour
NAAQS	National Ambient Air Quality Standards
NCVAS	National Center for Veterans Analysis and Statistics
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NOA	notice of availability
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
ODS	ozone-depleting substances
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
PEIS	programmatic environmental impact statement
Phase 1 ESA	Phase 1 environmental site assessment
PM	particulate matter ($PM_{2.5}$, PM_{10})
ppm	parts per million
psi	pounds per square inch
PTE	potential to emit
PV	photo voltaic
PVC	polyvinyl chloride
RCB	reinforced concrete box
REC	recognized environmental conditions
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SESC	soil erosion and sedimentation control
SHPO	State Historic Preservation Officer
SIP	state implementation plan
SO_2	sulfur dioxide
SoCalGas	Southern California Gas
SOI *Standards*	Secretary of the Interior's *Standards for Rehabilitation* (36 CFR 67)
SSPP	strategic sustainability performance plan
SWPPP	storm water pollution prevention plan
tpy	tons per year
U.S.	United States
UCLA	University of California, Los Angeles

USAF	United States Air Force
USC	United States Code
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	United States Department of Veterans Affairs
VOC	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 VA's 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 at the University of California, Los Angeles (UCLA) and University of Southern California 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 conceptual design plans originally developed in 2013 for the rehabilitation and reuse of Buildings 205, 207, and 208 (Castle-Rose, 2015). Analysis of the environmental and historic impacts of this action were initiated at the time, prior to VA's development of the separate WLAMC Draft Master Plan in 2016 (VA, 2016a) that outlined the long-term plan to help VA achieve its goal to revitalize the campus to be Veteran-focused. The development and reuse of other existing buildings and parcels at the WLA Campus identified in the 2016 Draft Master Plan are analyzed in the Programmatic Environmental Impact Statement (PEIS) that was released in December 2018 for comment (VA, 2018c). Although connected to and consistent with the 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. The 2016 Draft Master Plan calls for 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

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

1.2 Overview of the Proposed Action

Under the Proposed Action, VA would enter into Enhanced-Use Leases (EULs) with the private-sector entities at the WLAMC. This Proposed Action is consistent with the West Los Angeles Leasing Act of 2016 and the January 2015 settlement agreement to help VA end Veteran homelessness in Greater Los Angeles, is a key component of VA's mission to provide housing for at-risk and homeless Veterans, and is consistent with VA's Draft Master Plan to provide bridge

and permanent supportive housing and services at the WLAMC for underserved Veteran populations.

In 2013, VA identified Buildings 205, 207, and 208 on 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 map in Figure 2 shows the location of these buildings. 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 186 units of housing for Veterans—particularly those Veterans who are chronically homeless, severely disabled, women, and aging. Approximately 68 units would be provided in Building 205, 64 units in Building 207, and 54 units in Building 208.

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, new utility lateral lines for electric, potable water, sanitary sewer, and natural gas would be extended 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 supportive 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, 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 VA must evaluate the potential environmental impacts of VA facilities, operations, and related funding decisions prior to taking action.

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).

VA recently prepared a Draft EA, which was released for a 30-day review and comment period from November 1, 2018, through December 1, 2018. Following this period, several elements of the Proposed Action analyzed in the Draft EA were modified by the private entity developers, including an increase in the number of proposed housing units from 172 to 186, and inclusion of natural gas as an energy source for the three rehabilitated buildings. VA completed a Revised Draft EA to analyze these modified elements. Similar to the Draft EA, the Revised Draft EA did not anticipate any significant adverse impacts occurring to any resource from implementing the modified Proposed Action. The Revised Draft EA was released for agency and public comment during a 15-review period from March 15, 2019, through March 31, 2019. No public comments were received on the Revised Draft EA. Comments from LADOT concurred with the conclusions of the Transportation Analysis and Addendum methodologies and conclusions that were based on proposed occupancy of 186 units..

1.4 Decision Making

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 (that is, not implementing the Proposed Action), where the conditions as they currently exist at Buildings 205, 207, and 208 would remain unchanged.

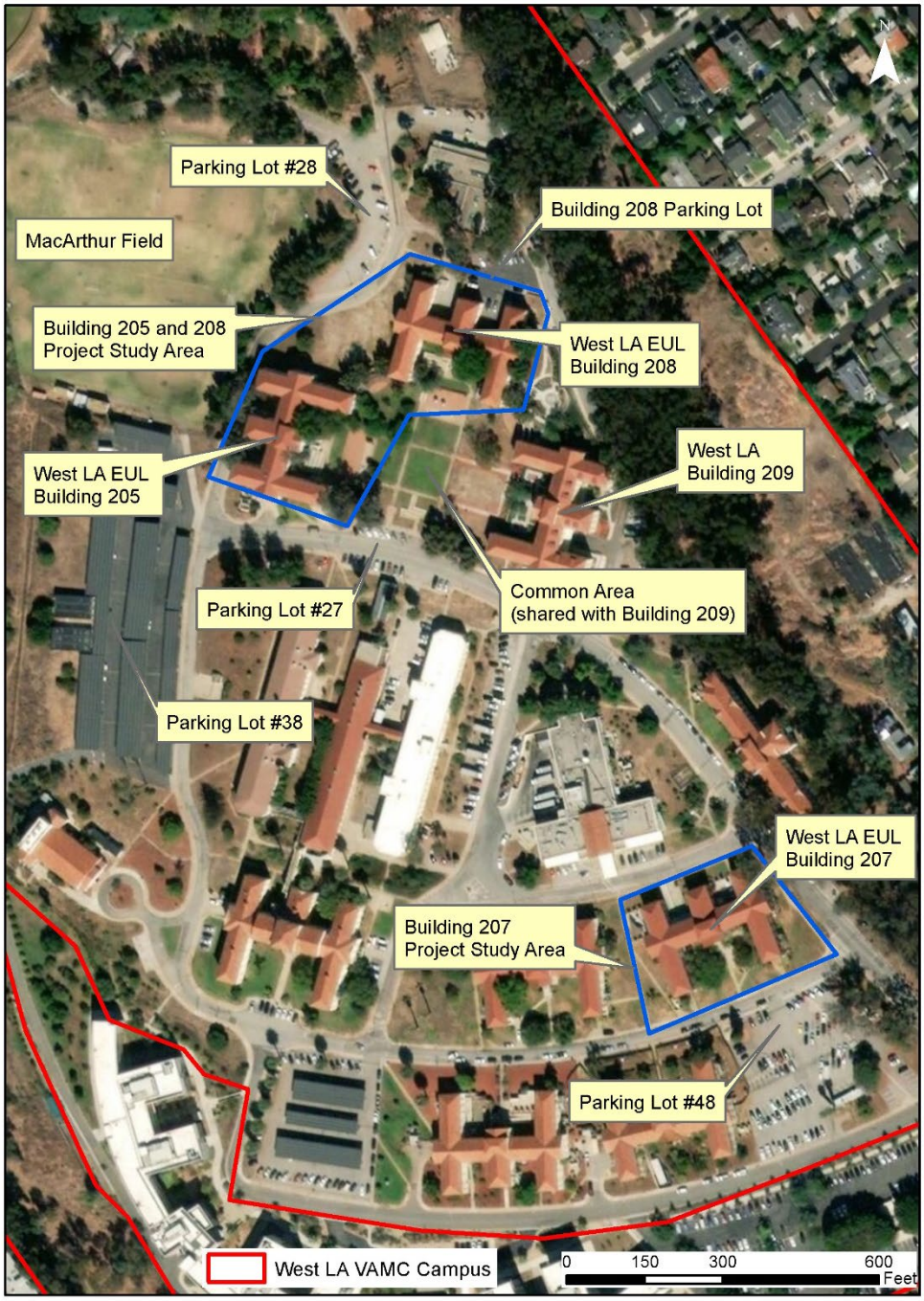
VA, as a federal agency, is required to incorporate environmental considerations into its decision-making process for the actions it proposes to undertake. This is done according to the regulations and guidance identified above. As such, this EA:

- 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 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 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 VA's NEPA guidance (VA, 2010). The decision to be made is whether—having considered the potential physical, environmental, cultural, and socioeconomic effects—VA should implement the Proposed Action including, as appropriate, measures to reduce adverse effects.

Figure 1. WLAMC Location Map

Figure 2. Locations of Buildings 205, 207, and 208, and Selected Parking Areas in the North Campus



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. 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 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. 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. 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 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, 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 186 units of housing dedicated to homeless and at-risk Veterans and their families. As contributing resources to the West Los Angeles Veterans Affairs (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 in the following subsections.

Seismic Corrections

The interior structural system of Buildings 205, 207, and 208 would be modified to have adequate strength to resist the design's lateral and moment forces during a major seismic event. Together with non-structural seismic corrections, these corrections would 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 and roof) would be strengthened as follows:

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

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

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

Architectural Rehabilitation

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

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

- The exterior ground would be regraded, new storm drains and lines installed, and waterproofing added in order to divert stormwater away from foundations and basement.
- The building interior would be entirely reconfigured to support new residential units, staff offices, and support facilities per 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 would be installed at the area between 205 and 208.
- The building exterior would be repaired, cleaned, and painted.
- New central variable air volume heating/ventilation/air conditioning (HVAC) system would be provided, installed, and commissioned.
- New copper plumbing would be installed to meet the current VA *Legionella* directive.

- Building 207
  - New VA accessible ramps would be provided at all exterior entrances.
  - New accessible toilet facilities would be provided.
  - New panic hardware and doors would be provided at all exits.
  - New code-compliant signage would be provided.
  - A new continuous handrail would be provided at the existing stairs.
  - The building interior would be entirely reconfigured to support new residential units, staff offices, and support facilities per VA provided program.
  - Repair or replace all metal sash windows to match the original historical design.
  - The building exterior would be repaired, cleaned, and painted.
- Building 208
  - General Exterior
    - Plaster finish would be protected during construction and repaired or patched where damage is evident due to efflorescence, delamination, spalling, or other processes.
    - Loose and flaking paint would be manually removed, and the exterior would be painted.
    - Proposed paint color would closely match the historical, integrally colored stucco and would be consistent with Building 205 (and the adjacent Building 209).
  - New VA accessible ramps would be provided at all exterior entrances.

- New accessible toilet facilities would be provided.
- New panic hardware and doors would be provided at all exits.
- New code compliant signage would be provided.
- New central HVAC system would be provided, installed, and commissioned.
- A new continuous handrail would be provided at the existing stairs.
- Two additional stairways would be added to meet current life-safety code requirements.
- The exterior ground would be regraded, new storm drains and lines installed, and waterproofing added in order to divert stormwater away from foundations and basement.
- The building interior would be entirely reconfigured to support new residential units, staff offices and support facilities per VA provided program.
- Repair or replace all metal sash windows to match the original historical design.
- Add new glass entry canopy.
- Add new plaza at south elevation.
- A new garden would be installed at the area between Buildings 205 and 208.
- The building exterior would 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 VA accessible ramp.
- Add new entrance atrium.
- New copper plumbing would be installed to meet the current VA *Legionella* directive.

Life Safety and Building Systems Upgrades

Buildings 205, 207, and 208 would receive a complete update to current building codes for building systems and life safety elements such as mechanical, electrical, plumbing, fire sprinkler, and emergency egress systems as follows:

- Add compliant emergency exits and 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-sector entities would be responsible for obtaining, operating, and maintaining all utility services at the three buildings. This includes installing new utility line laterals from the existing utility line mains to Buildings 205, 207, and 208 for potable water, sanitary sewer, electric, and natural gas. New utility line laterals would replace existing laterals, many of which are in poor condition, and would be installed within existing underground utility corridors.

For the potable water utility provided by the Los Angeles Department of Water and Power (LADWP), new lateral piping would be extended from the Brentwood main, which is located north of the WLAMC, following the existing underground potable water utility corridor, and then branching off to each building.

For the electrical utility, existing laterals would be disconnected from the current electric main lines originated at the Southern California Edison (SCE) Substation #2 at Building 299. Instead, new laterals would connect to a new SCE trunk line extending from Constitution Avenue at I-405, then north on Bonsall Avenue following existing underground utility corridors. New lateral connections from each building to this trunk line would be made at existing manholes.

The sanitary sewer system (network of pipes) within the WLAMC is owned and maintained by VA. For the sanitary sewer system utility, new laterals would be extended from Buildings 205 and 208 to either the existing 10-inch diameter lateral beneath Bonsall Avenue or to the 12-inch diameter main beneath Vandergrift Avenue. For Building 207, a new lateral would be extended from the southern side of the building to the 12-inch diameter main beneath Nimitz Avenue. 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. The new laterals and main segment would be installed within the existing underground sanitary sewer utility corridors. The existing WLAMC sanitary sewer system eventually extends to the southern border of the WLAMC, where a terminal main connects and discharges to the sanitary sewer utility line for eventual conveyance to the City of Los Angeles Sanitation (LASAN) treatment plant.

The natural gas utility is provided by Southern California Gas (SoCalGas). However, none of the three buildings are currently connected to the existing natural gas utility line main located in the north campus beneath Bonsall Avenue and terminating at Building 300. For Buildings 205 and 208, new laterals would be extended from this main terminus, following the existing underground electrical utility corridor. For Building 207, the new lateral would be extended from the main on Bonsall Avenue (adjacent to Building 207) where there is an existing utility manhole, to the east side of the building. This underground utility corridor would also be used for the new underground electrical lateral extending from Bonsall Avenue to Building 207.

The existing steam utility lines would remain in place but would be disconnected from each building, as this utility would no longer be used as an energy source at the three buildings under the Proposed Action.

Apart from minor upgrades to each buildings' stormwater drains and lines, which would connect to new stormwater holding tanks, bioswales, and raingardens at each building, no changes to the existing WLAMC stormwater system 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 NEPA Regulations (40 CFR Part 1502.14). For this project, No Action is defined as not implementing the Proposed Action.

Under the ***No Action*** alternative, VA would not enter into 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 presents 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, and 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 (air quality, noise, community services) that could potentially be indirectly or directly impacted by construction and operation of the Proposed Action.

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 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 WLAMC 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 one mile north of the WLAMC, 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 subsections.

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 its use 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 Patton 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, three-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, three-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 in Section 3.3, Cultural Resources. 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 to the north 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 traveling 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 in Section 3.3, Cultural Resources, 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 206, 210, 256, and 300, as Building 207 is visible from those buildings, as well as passersby along 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 subject 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 as those that are proposed for all three buildings. During the Building 209 rehabilitation period, no 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

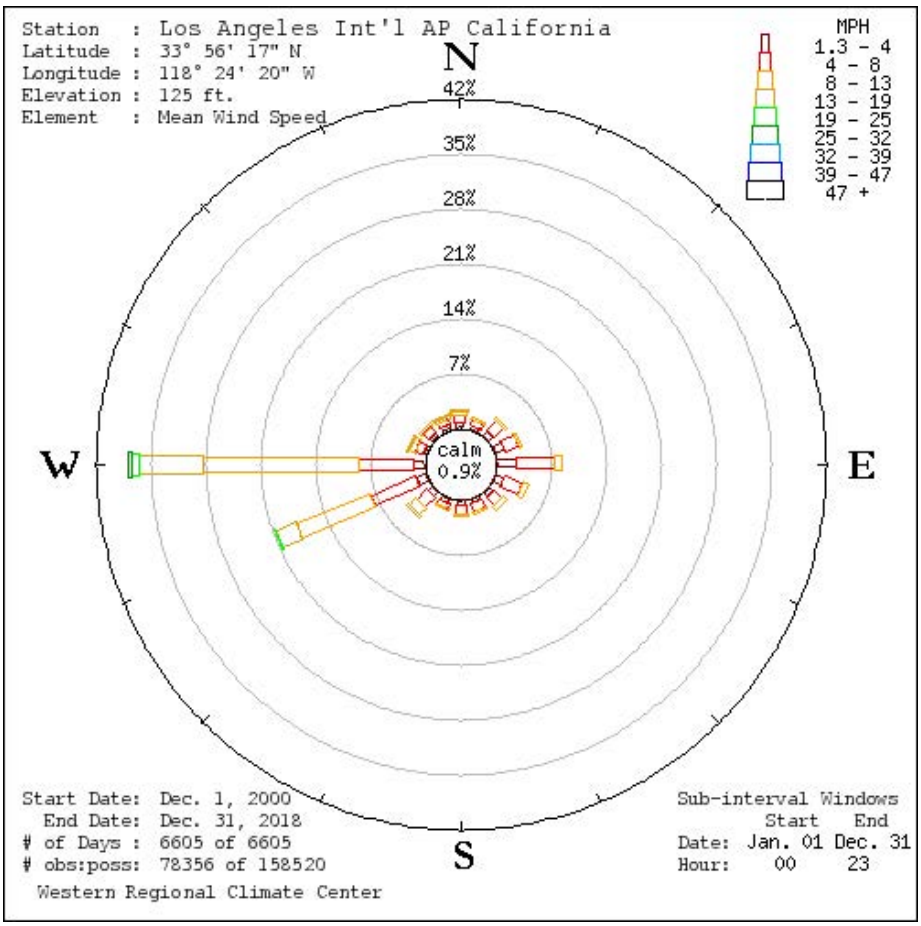
Under the No Action alternative, no changes would occur to the current aesthetic or visual character of Buildings 205, 207, and 208. Taking no action may allow historical features with culturally significant value to deteriorate over time, decreasing the pride of Veterans, visitors, and staff at the 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 Los 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). As 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 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:

- carbon monoxide (CO),
- nitrogen dioxide,
- ozone,
- lead,
- sulfur dioxide (SO_2),
- particulate matter (PM), including:
    - particulate matter sized 10 micrometers or less (PM_{10}), and
    - particulate matter sized 2.5 micrometers 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 (GCR) (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 parts per million [ppm]) – Non-attainment (extreme)
- CO
  - 1-Hour (35 ppm) – Attainment (Maintenance)
  - 8-Hour (9 ppm) – Attainment (Maintenance)
- Nitrogen dioxide
  - Annual (0.030 ppm) – Attainment (Maintenance)
- 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
  - 24-Hour (150 micrograms per cubic meter [$\mu g/m^3$]) – Attainment (Maintenance)
- Particulate matter 2.5
  - 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 PM_{10} status 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

In addition to the six criteria pollutants, the CAA regulates 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 (that is, 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 (identified as marginal, moderate, serious, severe, and extreme).

The WLAMC currently operates under a Title V Facility Permit (Facility Identification No. 14966) issued 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 (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 per 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 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 the National Cemetery Administration'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 GHGs, such as carbon dioxide, occur naturally and are emitted to the atmosphere through natural processes and human activities. Other GHGs (such as fluorinated gases) are created and emitted solely through human activities. The principal GHGs that enter the atmosphere because of human activities are CO2, methane, nitrous oxide, and fluorinated gases (including 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 GHGs, when a gas influences the atmospheric lifetimes of other gases, 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 GHG data and other relevant information from large sources and suppliers in the United States, no general GHG regulatory guidelines are in place. The purpose of the rule is to collect accurate and timely GHG data to inform future policy decisions. 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 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 (such as asbestos, lead-based paint, and polychlorinated biphenyls [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 a 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, potentially creating 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, $PM_{2.5}$, 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 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 $PM_{2.5}$) 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 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 – Volatile organic compounds (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 (for example, 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 (tpy)[1]	0.024804	0.156955	0.15506	0.000391	0.007197
On-Road Emissions (tpy)[2]	0.00054	0.0014	0.005	0.00002	0.00032
Total Emissions (tpy)	0.025	0.16	0.16	0.0004	0.007
General Conformity *de minimis* threshold (tpy)	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 disturbing building materials containing PCBs or lead-based paint, perform abatement and/or encapsulation according to all applicable federal, state, and local regulations. Only licensed contractors would perform these activities.
- Contractors would use equipment with Tier 4-compliant engines to reduce emissions of particulate matter and nitrogen oxides to meet emission standards established by USEPA and CARB.
- Reduce nitrogen oxides, volatile organic compounds (VOCs), and CO from engines rated over 50 brake horsepower (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 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 (10-40 miles per hour [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 would 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 (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 has 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 wall and ceiling 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.

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, 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) define an "adverse effect" as:

1. Physical destruction of or damage to all or part of the property;
2. Alteration 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; or
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 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*.

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 VA, in coordination with the developer, determines that application of the SOI *Standards* is not suitable for rehabilitation 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 (ASM) 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, 207, and 208 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 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 would be temporary in nature and would be minimized to the extent feasible. The temporary effects would not require removal of the buildings from the historic district or affect the historic character of the overall historic 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. In the event that a previously unidentified archaeological resource is discovered during the ground disturbing activities by the monitors, VA will follow the ASM, 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, VA shall proceed with reference to State Health and Safety Code Section 7050.5 states and Public Resources Code Section 5097.98. 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, VA shall comply with the requirements of the Native American Graves Protection and Repatriation Act. 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 in accordance 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, 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, 207, and 208 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, 207, and 208 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 U.S. Geological Survey (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.

VA's Office of Construction and Facilities Management 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 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 lower elevations along the western and eastern borders of the WLAMC create a plateau on which the remainder of the WLAMC is located. The two topographic bordering 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% 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 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 the long-term, significant beneficial impact of 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. During construction, the exterior grounds immediately surrounding the building exterior would be regraded in order to divert stormwater away from the foundation and basement. This grade would be maintained during operation. Overall, this regrading activity would represent an insubstantial change relative to existing topographic conditions. Further, 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 a negligible adverse 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 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.

Figure 8. USDA-NRCS Soil Map

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 rehabilitation 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 soils, 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 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 (such as diesel or hydraulic fluids) to soil quality. The construction contractors would be required to report releases of regulated quantities of petroleum-based fluids to 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 no adverse impact on soils.

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 soils.

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 on the buildings' resiliency to a seismic event. The No Action alternative would have no impact on other geological conditions, topography, or soils. 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. Wetlands and floodplains are discussed 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 them by natural and built features including Patton Avenue, a photovoltaic (PV) panel-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).

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 one 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.

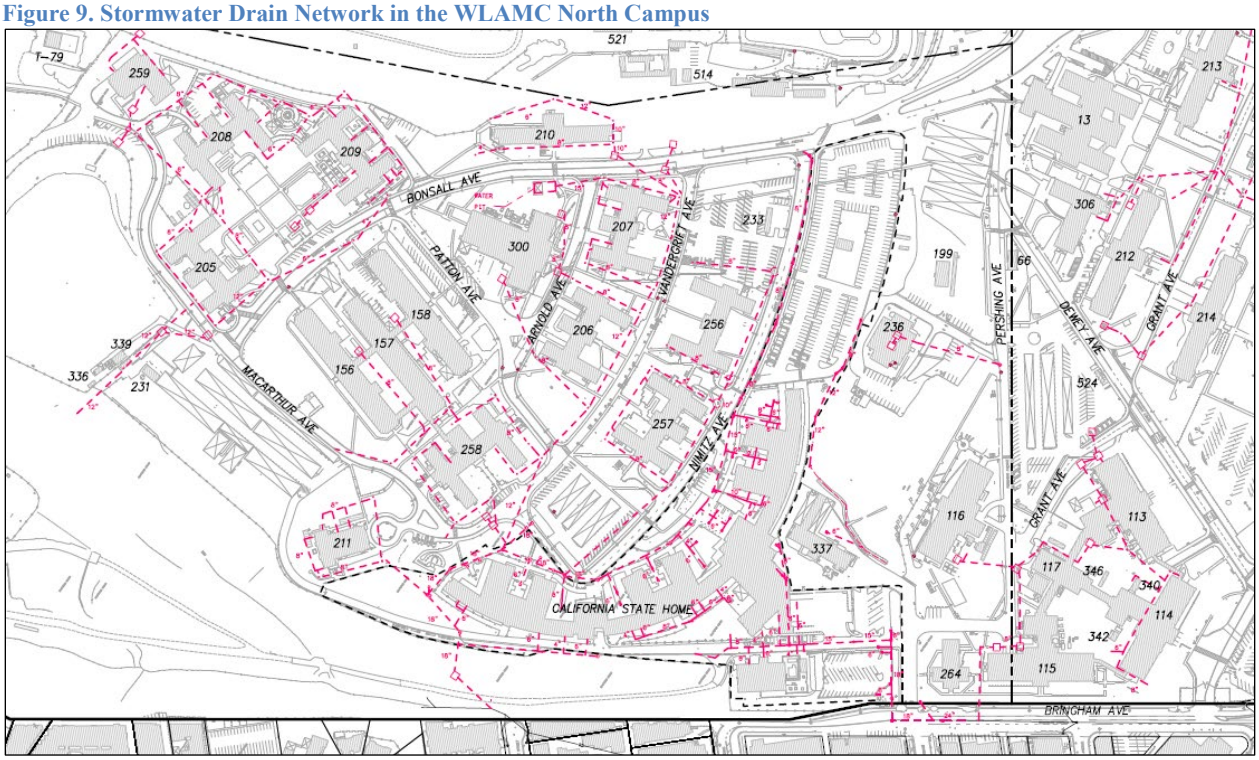
Stormwater is an important component of surface water systems because of its potential to introduce sediments and other contaminants that could degrade lakes, rivers, and streams. Stormwater flows, which can be exacerbated by high proportions of impervious surfaces associated with buildings, roads, and 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%) 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 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 are 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, toward 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 Boulevard and Bonsall Avenue 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 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, which regulate discharges to waters of the United States.

The Los Angeles Regional Water Quality Control Board 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 LA County Department of Public Works-owned drain lines that extend beyond the WLAMC. According to the WLAMC Green Energy Management System (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

Construction projects that disturb one 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. 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 the 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, 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 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 no 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 (such as mulching, catch basin inlet protection, silt fencing) 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 no 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. Additionally, regrading the grounds immediately surrounding each building to divert stormwater away from foundations and basements would improve stormwater drainage and subsequent capture in the aforementioned tank.

Therefore, operation of the Proposed Action would have no adverse impact on stormwater volume, and would have a minor, long-term, beneficial impact on stormwater 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 Federally Listed Plants and Wildlife

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

Migratory Bird Treaty Act

The U.S. Fish and Wildlife Service (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, Executive Order (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

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 Listed 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 federally 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 five miles 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 temporary 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 loss of habitat or the creation of new or improved habitat; therefore, no changes in the type of wildlife at the Proposed Action site would be anticipated. 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; therefore, there would be 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 include residences, hospitals, libraries, recreation areas, and religious institutions.

Sound pressure levels are quantified in decibels (dB), which depend on both frequency and intensity, and are identified by a level on a logarithmic scale. The way the human ear hears sound intensity is quantified in dBA, which are weighted according to the "A" weighting curve. 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 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. and 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 (such as construction activity or rubbish collection), standards for determining noise deemed a disturbance of the peace, and legal remedies for violations. This ordinance adopts the state California Environmental Quality Act 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 10 days in a three-month period would exceed existing ambient noise levels by 5 dBA or more at a noise sensitive use; 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 Avenue and Patton Avenue, 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 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 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 (Compensated 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 (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 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 UCLA campus is located one mile east of the WLAMC. UCLA has a longstanding relationship with 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 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 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 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 in Section 3.3, Cultural Resources.

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. Buildings 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 186 new permanent housing units on the WLAMC campus, allowing 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 186 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 National Wetlands Inventory 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".

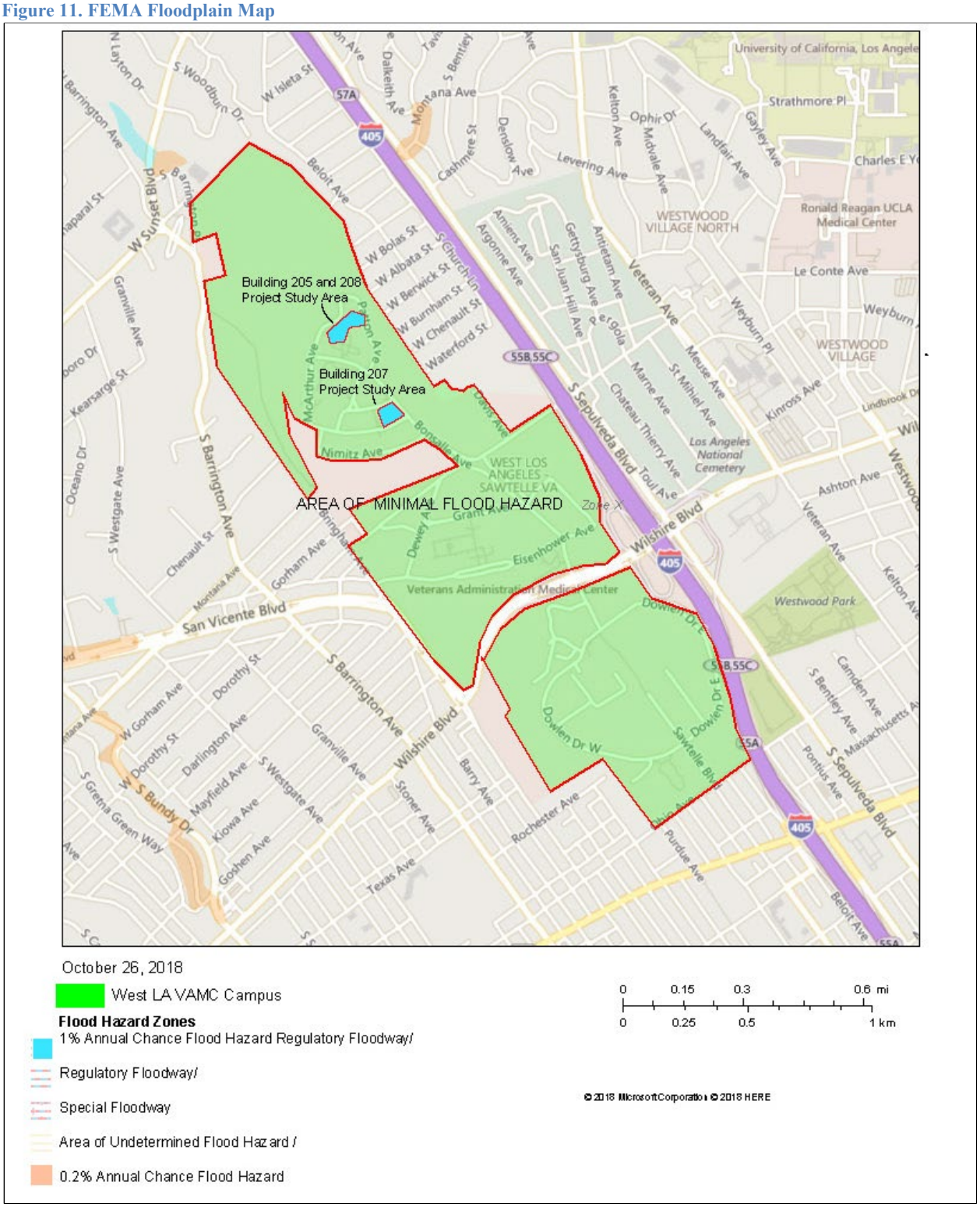
The Project Study Areas are located on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) No. 06037C1580F and 06037C1590F, dated September 26, 2008 (FEMA, 2008). According to the FIRMs, the Project Study Areas are in an area of minimal flood hazard, outside of the 0.2%- and 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 (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 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 no 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, 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

VA's 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 in the U.S. 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% of those experiencing homelessness in Los Angeles were sheltered (U.S. HUD, 2017).

Just under 30% 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 (US Census Bureau, 1-Year Estimate for 2016). The national unemployment rate among Veterans was 6.4% according to the 2012-2016 American Community Survey (ACS) 5-Year Estimates (U.S. Census, 2016). According to this same survey, 9.1% of Veterans in Los Angeles County earned income that 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 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 186 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. 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 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 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 (for example, 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, VA would not be in compliance with the West Los Angeles Leasing Act of 2016; the January 2015 settlement agreement to help 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 Waste 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 (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 (solids or liquids) not otherwise excluded by 40 CFR 261.4 that exhibit a hazardous characteristic (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 (such as 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 (29 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 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% to register with the Asbestos Contractors' Registration Organization.

Lead-Based Paint

The disturbance of lead-based paint 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. 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 PCB bulk product waste (for example, caulk, paint, mastics, sealants) at concentrations equal to or greater than 50 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 (such as 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 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 required permits. During rehabilitation, appropriate containment and safety measures would be implemented by licensed contractors to ensure that regulated building materials are not released to the air (as dust) or soil.

Construction debris would be segregated based on its content (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 waste and hazardous materials. All solid waste 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 solid waste and hazardous materials management measures would ensure that no adverse impacts from construction activities would occur.

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 person per day (California Department of Resources Recycling and Recovery, 2018). Based on an occupancy rate of 186 individuals, operation of the Proposed Action would generate approximately 880 pounds of waste per day, which is equivalent to approximately 160 tpy. 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-based paint, 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, 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 waste 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 analyze 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 (VA, 2018).

Utilities currently provided to Buildings 205, 207, and 208, include sanitary sewer, potable water, electric, steam, natural gas, telecommunications, and stormwater. The following subsections summarize information about these. Under the Proposed Action, the steam utility would not be used, so existing information for this utility is excluded from this summary. This summary includes a discussion of the natural gas utility, which is not currently provided to the three buildings but would be under the Proposed Action. Additionally, the telecommunication utility is not discussed, as no substantive changes would occur under the Proposed Action. A discussion of the stormwater system is provided under the Stormwater heading in Section 3.5.1.2 and is not repeated here.

3.12.1.1 Sanitary Sewer

The sanitary sewer system (the network of underground utility lines) within the WLAMC is owned and operated by VA. Sanitary septic wastewater treatment for the WLAMC is provided through contracted services from LADWP. LADWP maintains a wastewater partnership with 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 lateral 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) (Figure 12). 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 utility lines collect and converge the sanitary septic wastewater with a final connection to the LASAN's sanitary sewer system at a manhole located on the southern boundary of the WLAMC, adjacent to Ohio Avenue and Sawtelle Boulevard (Figure 12).

Many of the mains 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 polyvinyl chloride (PVC) building connection, it connects to the original clay pipe lateral.

The individual sanitary sewer lateral lines that extend from Building 205 and 208 eventually connect to a 12-inch diameter main (segment A-7) beneath Vandergrift Avenue, while the Building 207 lateral connects to this main at segment A-6 beneath Nimitz Avenue (Figure 13). The A-7 section of this 12-inch diameter main (shaded light green on Figure 13) initially receiving flow from Buildings 205 and 208 operates at approximately 67% of its load capability (indicating it has sufficient capability). However, the downstream A-6 segment (shaded yellow on Figure 13), after receiving sewerage from Building 207, is at 120% of its load capability (indicating it is overloaded). This main line A-6 segment transitions to segment A-5, also operating at 120% of its capability, until reaching the A-4 segment (shaded dark green on Figure 13) which eventually transitions to the south campus main headers 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). The aforementioned load capabilities include the peak sewage demand loads from Buildings 205, 207, and 208.

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 located south of Building 257 on Nimitz Avenue. The Building 207 lateral extends south, crosses under Vandergrift Avenue, then connects to the larger main on Nimitz Avenue. This main continues east along Constitution Avenue, then extends south into the south campus following the alignment of Dowlen Drive East. It eventually discharges to the LASAN sanitary sewer network at a connection point located along the border of the south campus at the intersection of Sawtelle Boulevard and Ohio Avenue.

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

3.12.1.2 Potable Water

The LADWP supplies water to the WLAMC and customers in the greater Los Angeles region. LADWP provides two domestic potable 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 14). 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 diameter 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 tanks or bypass the tanks 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).

Figure 12. WLAMC Sanitary Sewer Utility Corridors

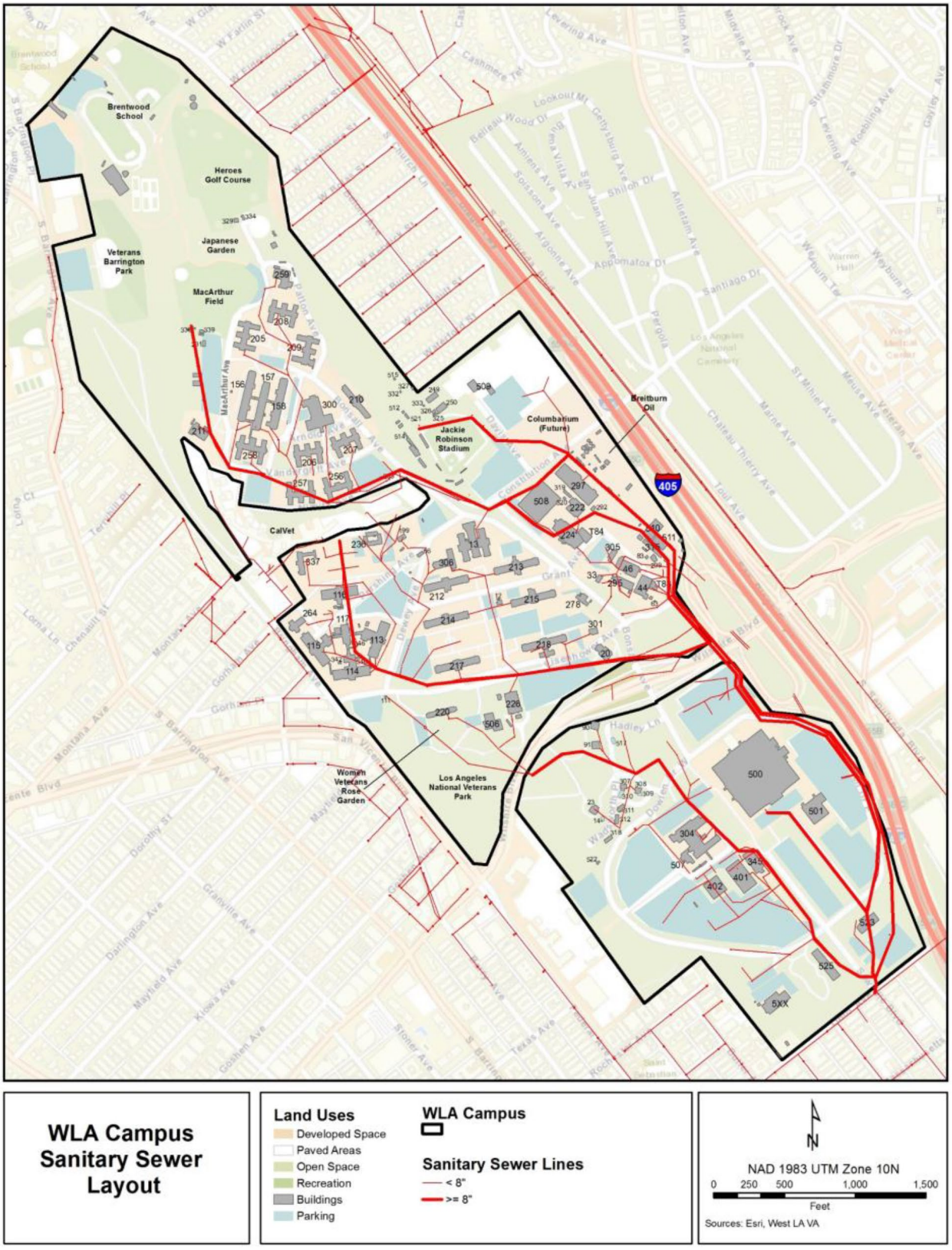


Figure 13. Sanitary Sewer System Capability Detail

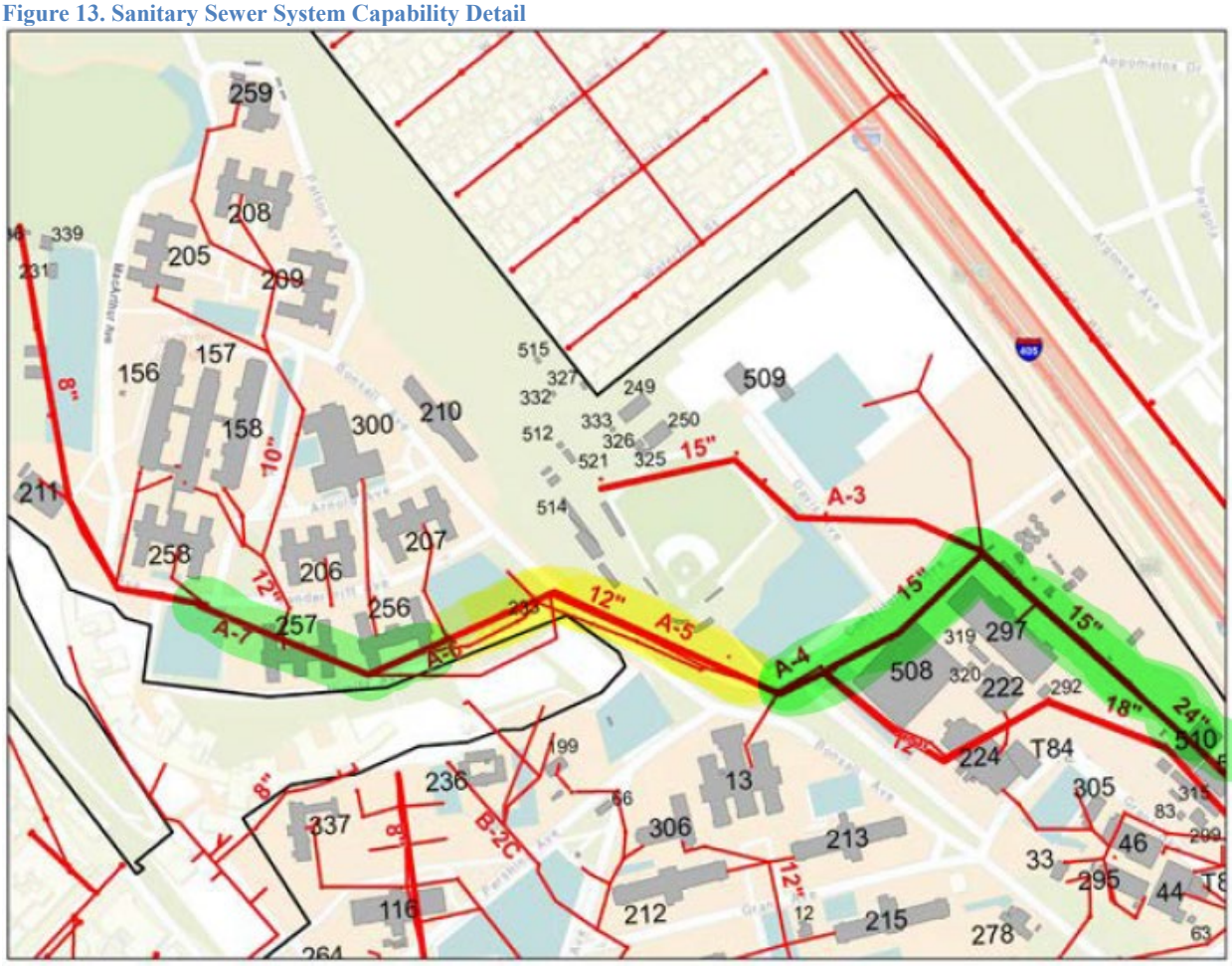
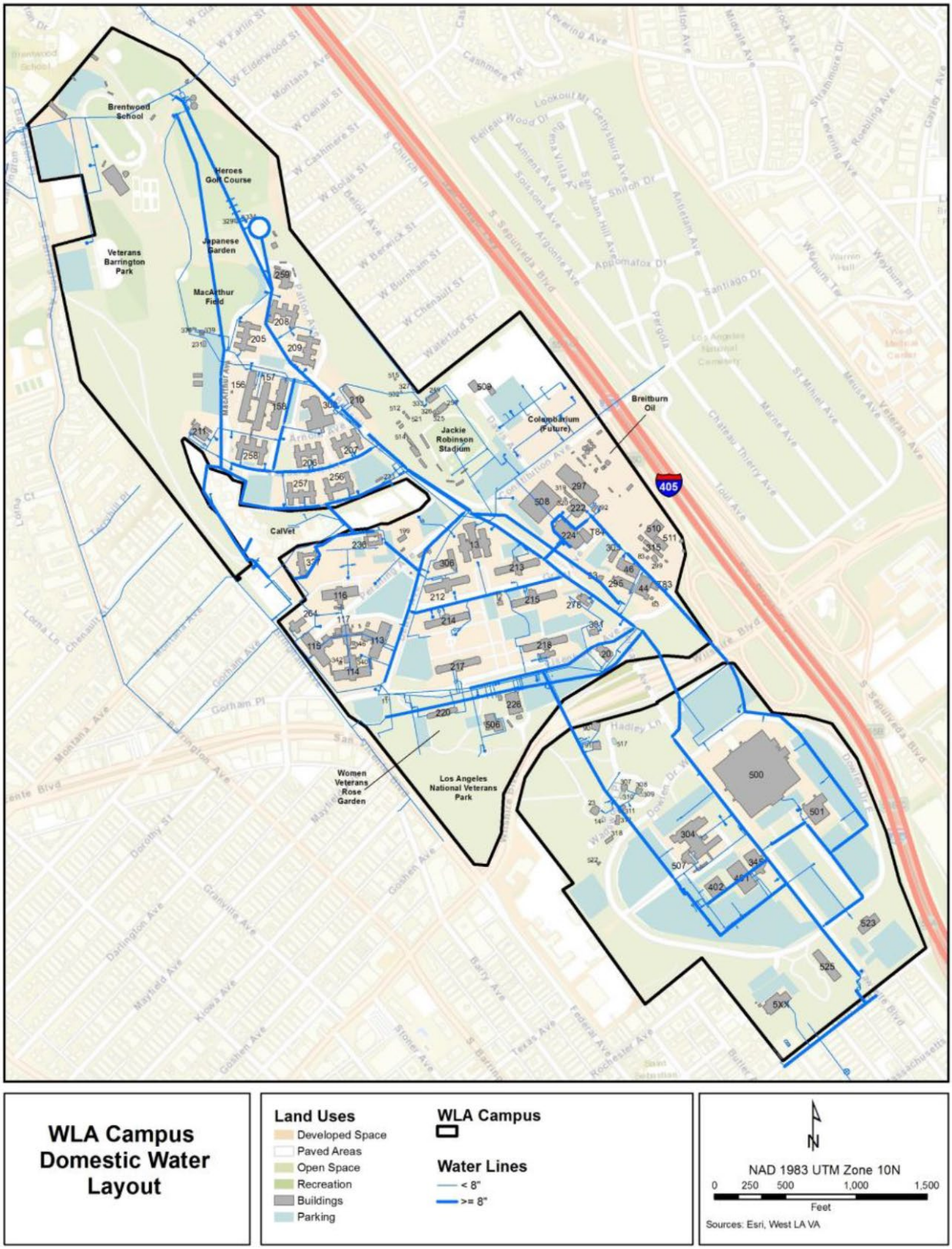


Figure 14. WLAMC Potable Water Utility Corridors



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 at Buildings 205, 207, and 208, indicated the systems passed with no issues or concerns (VA, 2018).

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

Building 205

Building 205 has a single 4-inch diameter 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 GPM, and, based on the building'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

Building 207 has a single 4-inch diameter 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. 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.

The domestic water service entrance has a peak capacity of 200 GPM and, based on the building'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.

Building 208

Building 208 has a single 4-inch diameter 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 west lawn. Service piping enters into a mechanical room located in the basement. 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.

The domestic water service entrance has a peak capacity of 200 GPM and, based on the building'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.

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). As previously noted, 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 of Building 208 or the south side of Building 205 (Figure 14). 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 underground 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.

3.12.1.3 Electric Utility

Primary electrical utility power at the WLAMC is provided by SCE (VA, 2017a). The WLAMC consumed 47,955 megawatt hours (MWh) in 2015 and 46,707 MWh in 2016. Approximately 43% 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 near the eastern border of the south campus. 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. Circuits #1 thru #6 all have remaining capability 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 MWh but could be as high as 12-13 MWh 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 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 operation and maintenance 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 kilovolt ampere (kVA). The building currently has a diesel-powered 150 kilowatt (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. The 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 estimated load 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).

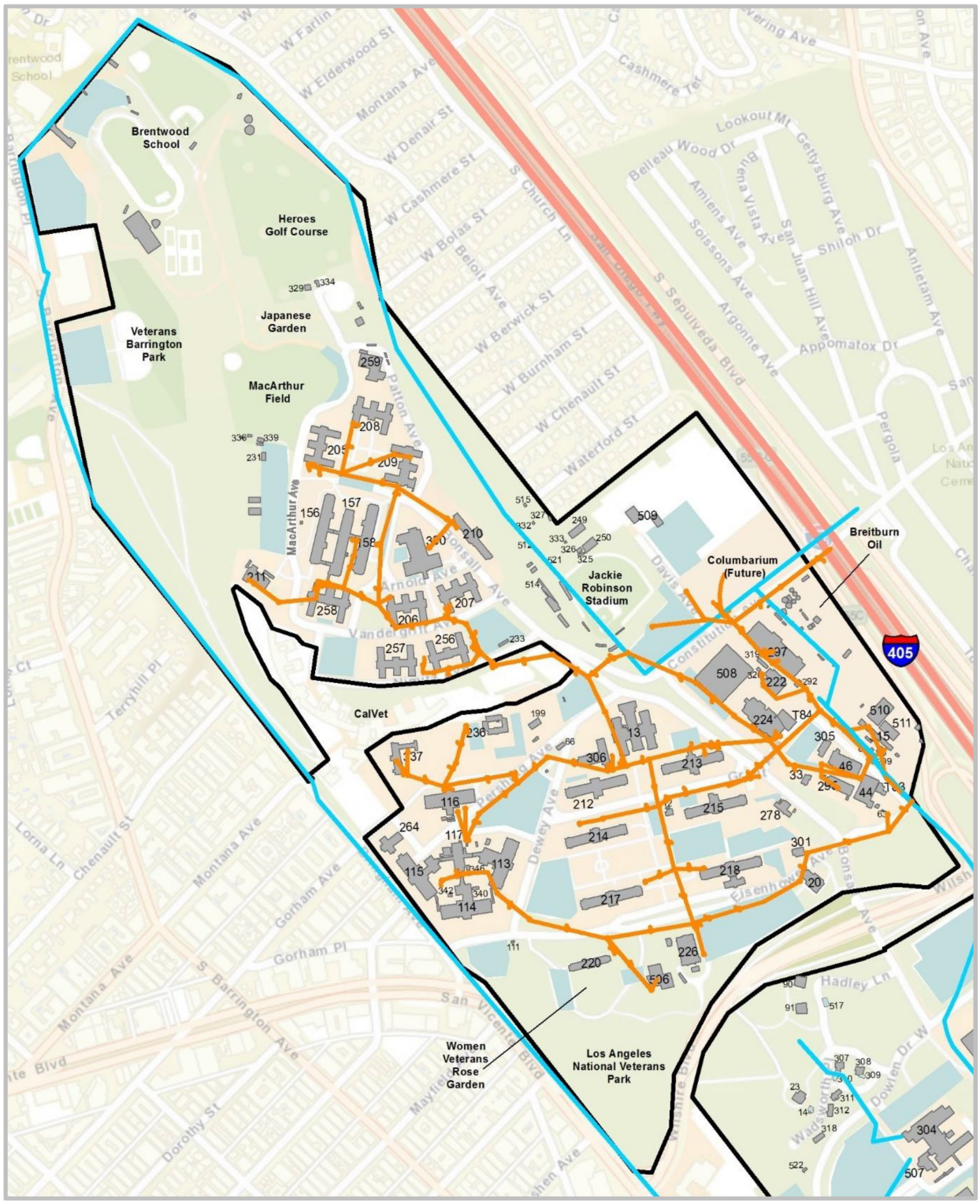
The WLAMC also obtains electricity from more than 7 megawatts of PV power systems installed on building roofs, parking lot canopies, and ground-mounted systems at the WLAMC The electricity generated by the PV systems is returned to the WLAMC electrical grid.

Electric Utility Corridor

The WLAMC 5 KV electrical utility (orange line on Figure 15) serving the north campus is distributed via an underground duct bank that extends north from Building 299 and generally parallel to Bonsall Avenue, passes beneath Constitution Avenue then turns northwest to pass under Bonsall Avenue, and continues northwest beneath a portion of Nimitz Avenue and Vandergrift Avenue, where a lateral extends from the main duct bank to the southwest corner of Building 207. The electrical utility duct bank continues north along Patton Avenue, between Buildings 158 and 300, passes west beneath Bonsall Avenue, then extends in separate banks leading up to Buildings 205, 208, and 209, with short laterals extending into each building.

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

Figure 15. WLAMC Electric Utility Corridors



3.12.1.4 Natural Gas Utility

Natural gas fuel is purchased through a VA-negotiated commodity contract with Tiger Natural Gas, Inc (VA, 2017a). The purchased natural gas is then transported to the WLAMC under a separate contract with SoCalGas. Natural gas is delivered to the WLAMC through the SoCalGas Los Angeles natural gas piping infrastructure.

Natural gas service enters the WLAMC via an 8-inch diameter SoCalGas underground mainline near Building 299, where it enters a pressure reducing station to reduce the pressure from 30 pounds per square inch (psi) to 7 psi prior to distribution within the WLAMC (Figure 16). Underground distribution lines generally follow existing utility corridors beneath Bonsall Avenue to supply the north or south campus. Although the natural gas piping in the south campus is newer high-density polyethylene, the north campus piping is original construction, coated-black steel. The original piping available for inspection was in poor condition (VA, 2017a). Only 31 buildings tie into the natural gas distribution system. Currently, Buildings 205, 207, and 208 do not have natural gas connections. In the north campus, the natural gas line extends beneath Bonsall Avenue, with a lateral to Building 300.

The baseline natural gas demand for the WLAMC was approximately 242,000 million British thermal units (MMBtu) in 2017 (VA, 2017a). The peak load of demand for natural gas at the WLAMC is approximately 80,190 cubic feet per hour (CFH). (One CFH is roughly equivalent to 1,000 Btu). Currently, approximately 87% of the natural gas supplied to the WLAMC is consumed by the laundry facility (6,000 CFH) and the central steam plant (64,000 CFH). These two facilities are served by dedicated natural gas piping from the pressure reducing station such that their gas consumption does not impact demand for other facilities at the WLAMC.

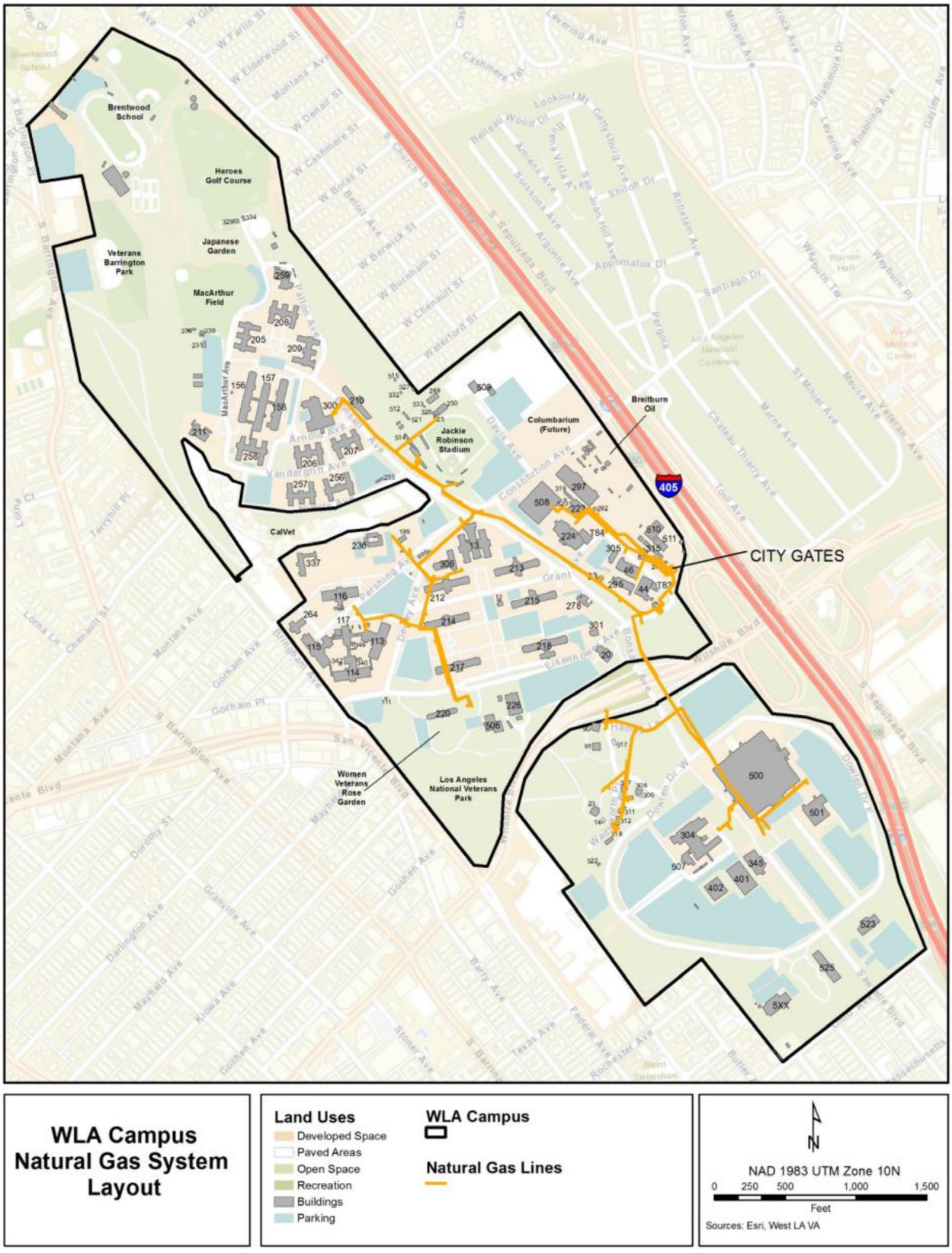
An analysis of the existing natural gas utility determined that there is sufficient natural gas capacity to support future demand at a level 150% above the current demand (VA, 2017a). However, if greater pressures were available at the utility pressure-reducing station, then the WLAMC natural gas mains would have a greater capacity to carry a higher volume of gas with potential to meet expected future demand (VA, 2017a).

Natural Gas Utility Corridor

The existing underground natural gas utility corridor in the north campus is located beneath Bonsall Avenue and terminates near its lateral to Building 300 (Figure 16). The underground natural gas line utility corridor beneath Bonsall Avenue is located approximately 45 feet east of Building 207, while its terminus (near Building 300) is located approximately 750 feet southeast of Buildings 205 and 208.

The existing natural gas utility corridor is located beneath hardscape (roads, sidewalks) in previously disturbed grounds.

Figure 16. Natural Gas Underground Distribution Network and Utility Corridors



3.12.2 Environmental Consequences

3.12.2.1 Proposed Action

Under the Proposed Action, the private-sector entities would be responsible for obtaining, operating, and maintaining all utility services at the three buildings. Additionally, the private-sector entities would be responsible for installing, maintaining, and operating new utility line laterals that extend from the existing utility line mains for potable water, sanitary sewer, electric (via the new SCE trunk line), and natural gas, to Buildings 205, 207, and 208. This action upgrades the existing sanitary sewer, potable water, and electric underground utility line laterals, many of which are in poor condition, and supplies the natural gas utility to each building.

All of the new utility line laterals, as well as the new electric trunk line from Constitution Avenue north to Bonsall Avenue, would be installed within existing utility corridors and disturbed grounds, and all work would proceed according to the ASM previously described under Section 3.3.1. Limiting excavations to areas that are already disturbed minimizes the potential for impacting cultural resources and degrading soil quality.

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

Additionally, the WLAMC GEMS Coordinator has confirmed that similar construction activities to repair or upgrade utility systems have not adversely impacted the 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.

Construction. Prior to construction of the new potable water, sanitary sewer, electric, and natural gas utility line laterals, the private-sector 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 potential 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.

An analysis of the potential construction impacts for each utility is provided in the following subsections.

Potable Water Utility

For the LADWP potable water utility, a new subsurface lateral would be extended along the existing potable water utility corridor from the Brentwood main to each of the three buildings. Any further extension of separate branch laterals to each building would also follow existing underground branch corridors.

Electric Utility

For the electrical utility, the three buildings would connect to a new SCE trunk (main) line that extends from Constitution Avenue at I-405 onto the north campus to Bonsall Avenue, and then north on Bonsall Avenue following existing underground utility corridors. The trunk line would extend to existing utility manholes located near each of the three buildings. This new trunk line

would be separate from and not connected to the existing electric utility infrastructure at the WLAMC or at Substation #2.

At Building 207, a new electric lateral would be extended approximately 45 feet from the new trunk line (connect at the utility manhole beneath Bonsall Avenue) to the eastern side of the building. The grounds between the manhole and Building 207 have previously been disturbed during construction of utility corridors for storm drains and a former water line (currently abandoned). This lateral utility corridor would also be used for the new natural gas lateral. For Buildings 205 and 208, new lateral connections would be made to the new trunk line within existing utility manholes near each building, and extend to each building using existing utility corridors.

Sanitary Sewer Utility

For the sanitary sewer utility, the existing clay laterals between each building would be removed and replaced with new PVC laterals. For Building 207, the new lateral would extend approximately 350 feet between the south side of the building to the 12-inch diameter main (segment A-6) beneath Nimitz Avenue. For Buildings 205 and 208, new laterals would be extended from each building to either the existing 10-inch diameter lateral beneath Bonsall Avenue or to the 12-inch diameter main (segment A-7) beneath Vandergrift Avenue. All of the new sanitary sewer laterals would be installed within existing sanitary sewer utility corridors. 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. Work would be performed within the existing sanitary sewer corridor.

Natural Gas Utility

None of the three buildings are currently connected to the existing natural gas utility system in the north campus. This main is located beneath Bonsall Avenue and terminates at Building 300. At Building 207, a new lateral would be installed and extended approximately 45 feet from the natural gas main (where a utility manhole currently exists) beneath Bonsall Avenue to the eastern side of the building. The natural gas lateral underground utility corridor would be adjacent to the electric duct servicing Building 207. For Buildings 205 and 208, the natural gas utility would be extended north from the existing terminus near Building 300, following the existing underground electrical utility corridor to each building.

Steam Utility

Under the Proposed Action, steam service would no longer be provided to Buildings 205, 207, and 208. However, the physical infrastructure (steam and condensate lines) would remain in place.

Operation. Upgrades to the aforementioned utility 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 occupants of these buildings. This benefit would be achieved because the new utility infrastructure would be constructed of newer materials and comply with modern building codes, thus requiring less overall maintenance to operate efficiently and at full design capacity. Additionally, operation would no longer place a demand on the steam utility.

The renovation of Buildings 205, 207, and 208 would also result in the replacement of obsolete electrical and plumbing fixtures with energy-efficient and low-flow versions; replacement of obsolete HVAC systems with modern energy-efficient components, air flow design, and controls;

and replacement of single-pane windows with energy-efficient versions. Accordingly, operating Buildings 205, 207, and 208 would utilize utilities more efficiently and potentially reduce the rate at which utilities are consumed.

Operation of the Proposed Action would involve typical residential activities at up to 186 units; these activities would use these aforementioned utilities. Based on the prior utility studies (VA, 2017A, VA, 2018), the utility infrastructure that the new laterals would connect to has sufficient capacity to meet projected demand without reducing service quality to other utility users at WLAMC or in the surrounding community. Additionally, connecting new electric laterals to the new electric trunk line avoids placing any demand on the separate WLAMC electric utility infrastructure.

An analysis of operational impacts for each utility is provided in the following subsections.

Sanitary Sewer

The sanitary sewer utility line improvements completed during construction would remain the responsibility of the private-sector entities during operation under the EUL.

As identified in Section 3.12.1.1, the peak calculated sanitary sewage demand load is estimated at 580 DFUs for Building 205, 306 DFUs for Building 207, and 654 DFUs for Building 208 (VA, 2017a, VA, 2018). Based on a comparison of the sanitary sewer utility peak capacities (3,500 DFUs) with the total peak utilization demand for all three buildings, the sanitary sewer utility has sufficient capacity to convey sanitary sewage from the three buildings to the mains. Additionally, the new utility line laterals would help to address potential deficiencies in the age, size, and integrity of the existing sanitary sewer laterals.

Per previous statements in the draft EA released in November 2018, as proposed a portion of the sewer system would be operating at 120% of capacity, assuming full occupancy of Buildings 205, 207, and 208. The overcapacity issue would be addressed by the developer associated with Building 207. A corrective action would be put in place that may include an upgrade to the sewer main closest to Building 207 currently calculated to experience an overcapacity issue.

The WLAMC sewer mains further downstream have sufficient capacity to convey the combined sewage volume generated from the operation of the Proposed Action and other existing buildings at the WLAMC to the LASAN connection. The operational sewage volume would represent a negligible addition and impact on LASAN's sewer system which conveys approximately 400 million gallons per day from four million customers and 29 contracting cities and agencies to four wastewater treatment plants.

Potable Water

The potable water utility line improvements completed during construction would remain the responsibility of the private-sector entities during operation under the EUL.

As identified in Section 3.12.1.2, based on a comparison of the potable water utility peak capacities with the peak utilization demand for each of the three buildings, the potable water utility system has sufficient capacity to supply the three buildings without causing a decrease in service quality to other potable water utility users within WLAMC or in the surrounding community. Obtaining potable water via the new laterals between the Brentwood main and the three buildings would also help to address low water pressure issues previously reported at Buildings 205 and 208. Additionally, the use of water-saving fixtures would further increase the efficient use of the potable water utility during operations.

Electric

The electric utility line improvements completed during construction would remain the responsibility of the private-sector entities during operation under the EUL.

As identified in Section 3.12.1.3, the three buildings would have new laterals connecting to the new electric trunk line. This new trunk line would have sufficient capacity to supply the electric demand from each of the three buildings. As previously described, this new electric utility infrastructure is separate from the existing WLAMC electric utility infrastructure. Therefore, operation of the Proposed Action would have no impact on this existing system or future capacity concerns. Additionally, the aforementioned estimated electrical load that the three buildings would place on the new electric utility infrastructure would not cause a decrease in SCE's quality of service provided to other electric utility consumers at WLAMC or in the surrounding community. Further, the upgraded building systems and energy-efficient appliances would help to increase the efficient use of the electric utility and thereby reduce overall demand.

Natural Gas

The natural gas utility line improvements completed during construction would remain the responsibility of the private-sector entities during operation under the EUL.

As identified in Section 3.12.1.4, the existing natural gas utility has sufficient capacity to meet the demand anticipated at all three buildings without causing a decrease in service quality to other natural gas utility users within WLAMC or in the surrounding community. Using the natural gas utility for heating water would also increase energy efficiency and decrease costs otherwise associated with switching to a new energy source (oil-fired boilers) or using steam.

3.12.2.2 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 or the campus as a whole. 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 on 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), 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 miles) from the Project Study Areas. Of the 11 bus lines, five are walkable from both north and south campus, three are walkable from the north campus, and three 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 have been studied (VA, 2018a; VA, 2019). These studies accounted for existing traffic conditions and projected how traffic would be impacted based on the Proposed Action initially for 172 units (VA, 2018a), as well as the revised Proposed Action for 186 units (VA, 2019). A copy of the 2019 Transportation Analysis and Addendum is accessible at: http://www.westladraftmasterplan.org/documentation/nepa-and-nhpa.

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

According to LADOT policy, a significant impact is identified as an increase in the volume to capacity ratio due to Project-related traffic of 0.010 or more when the final (with Project) Level of Service is LOS E or F, a volume to capacity ratio increase of 0.020 or more when the final Level of Service is LOS D, or a volume to capacity ratio increase of 0.040 or more at LOS C. No significant impacts are deemed to occur at LOS A or B, as these operating conditions exhibit sufficient surplus capacities to accommodate large traffic increases with little effect on traffic delays. However, due to the presence of upstream queuing along Wilshire Boulevard, the most strict significant impact criteria (corresponding to LOS E or F) were applied to the two signalized intersections along the Wilshire Boulevard mainline, regardless of the calculated volume to capacity ratio (VA, 2019).

A 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 17) (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 parking lots immediately adjacent to the Building 205 and 208 Project Study Area. The parking lots closest to Buildings 205 and 208 are 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 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, from 8 a.m. to 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

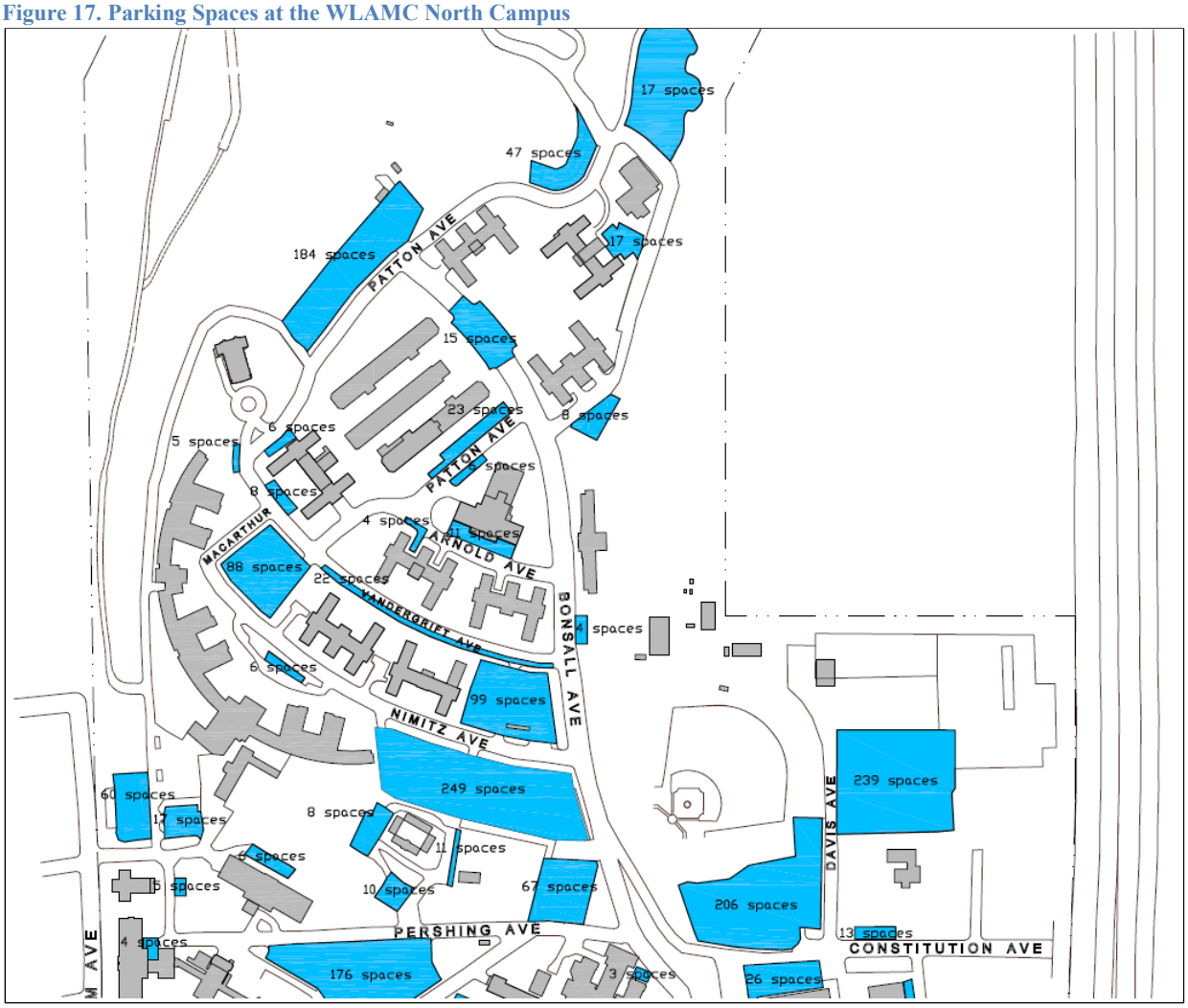
Construction vehicles and equipment would be staged in the open area between the north side of Building 205 and the west side of Building 208 (refer to Figure 3). This area has previously been used to stage construction equipment.

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.

Figure 17. Parking Spaces at the WLAMC North Campus



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 line laterals provided to Buildings 205, 207, and 208 would be replaced with new laterals. Access to the utility lines would require excavation along each of the existing utility corridors.

The WLAMC GEMS Coordinator explained that prior excavations within 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 updated transportation impact analysis determined that operation of the Proposed Action (based on 186 units) would not decrease the current LOS at any of the six intersections near the Project Study Areas (VA, 2019). 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, 2019). LADOT concurred with the methodologies and conclusions presented in the 2019 traffic study (a copy of LADOT's comments are provided in Appendix B).

The transportation impact analysis also projected that, under the Proposed Action with 186 units, on a daily basis between 69 and 86 vehicles would travel to each of the three buildings (for a total daily volume of approximately 236 vehicles) (VA, 209). This future operational traffic volume represents a net decrease of approximately 156 vehicles compared to the 400 vehicles that traveled to Building 208 alone in 2017 (the most recent data that were available, and when Building 208 was still in use as a mental health clinic) (VA, 2018a, VA, 2019).

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 significant adverse traffic impacts at any of the study intersections, roadway segments, or public transportation system (VA, 2019).

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 (ITE) (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 per residential unit)	Project Parking Demand (ITE rate of 0.41 spaces per 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	64 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

EO 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" was enacted in 1994 to focus federal agencies' 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 an insufficient supply of supportive housing at the WLAMC for homeless or at risk low-income and minority Veteran populations in need. The No Action alternative would prevent VA from meeting 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 and trends would continue.

3.15 Cumulative Impacts

The CEQ regulations for implementing NEPA (40 CFR Part 1508.7) define cumulative impacts 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 2016 Draft Master Plan, the 2018 PEIS, and information provided by VA and WLAMC staff. The past, present, and reasonably foreseeable future projects considered include:

- The prior rehabilitation (seismic corrections, physical improvements) and reuse of Building 209 to a residential facility for homeless Veterans.
- Future repair and/or replacement of existing utilities including stormwater, potable water, sanitary sewer, electrical, and natural gas 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 2016 Draft Master Plan, so the planning for the two actions has proceeded independently. That is, decision-making regarding the Proposed Action is independent from the set of other potential future projects designed 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. Implementing the Proposed Action would expedite 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 as part of 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 above a negligible level to aesthetics (construction), air quality (construction), cultural resources (construction), soils (construction), noise (construction), sanitary sewer utility (operation), and transportation (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.

3.15.2.1 Utility Infrastructure

As previously described, under the Proposed Action the private-sector entities would be responsible for obtaining, operating, and maintaining all utility services at the three buildings. Additionally, the private-sector entities would be responsible for installing, maintaining, and operating new utility line laterals for potable water, sanitary sewer, electric (via the new trunk line), and natural gas service. Transitioning the responsibility of operating and maintaining utility services from the WLAMC to the private-sector entities would have a less-than-significant adverse impact on stormwater, sanitary sewer, potable water, electrical service, and natural gas 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 management system is in generally good condition but is also over 80 years old. Although the Proposed Action would not increase impervious surfaces or the volume of stormwater entering the stormwater network, several of the Draft Master Plan proposed projects, such as new construction in MacArthur Field and Heroes Golf Course, involve construction activities that would convert open grassy areas to impervious surfaces (for 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 storm drain 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 tanks, 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 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 addition 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. Water conservation measures under VA's 2015 Strategic Sustainability Performance Plan (SSPP) would therefore 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 relative to overall consumption in the Los Angeles region. The LADWP 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 at 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 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 sewerage volume associated with future building occupancy. The improvements would require upgrading and replacing existing sewer mains, laterals, and branch lines to manage the increased volume, because many of the existing sanitary sewer mains, branches, and laterals are nearing or already exceeding design capabilities, 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 generated at the WLAMC compared to the current volume. However, this increase would be negligible relative to the volume treated by LASAN in the Los Angeles region. LASAN is anticipated to have suitable capacity available to meet this future increase in volume 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 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-sector entities to obtain electric service by connecting laterals to a new trunk line extending from Constitution Avenue and I-405 and then north along Bonsall Avenue. In addition to the Proposed Action, this trunk line may be used to supply the electric demand associated with potential future development in the north campus. The proposed future developments and/or rehabilitations to existing buildings would include replacing older, energy-intensive systems with more energy-efficient models and implementing VA's SSPP target for a 30% reduction in electric usage. However, the potential future developments would increase the demand on the new trunk line. Prior to potential future development, private-sector entities would determine the anticipated demand and coordinate with the WLAMC and SCE to ensure there is adequate supply available either from the new trunk line alone or a combination of the trunk line with the existing electric utility infrastructure. Any upgrades required would be addressed at that time to ensure the electric utility infrastructure adequately serves potential future developments at the WLAMC. The potential future electric demand at the WLAMC would represent a negligible increase relative to the demand in the Los Angeles region, and SCE (or the LADWP) is anticipated to have suitable capacity available to meet future increases 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 less-than-significant adverse levels.

The addition of past, present, and foreseeable actions on the WLAMC would have a cumulative impact on the natural gas utility. As previously described, the Proposed Action would require the private-sector entities to install new underground natural gas laterals from the existing terminus at or near Building 300 to Buildings 205, 207, and 208. The extensions would be made in existing utility corridors and previously disturbed grounds. In addition to the Proposed Action, potential future projects would require extending the natural gas utility distribution network to other areas within the north campus (where a network does not currently exist) to support the added demand associated with future development activities. The potential future physical expansion is not anticipated to have a cumulative significant adverse impact, because, prior to construction, the private-sector entities would coordinate with the utility provider and the WLAMC to ensure the design and installation of the expanded network minimizes or avoids service interruptions within the WLAMC or to other SoCalGas customers. Additionally, the estimated natural gas consumption based on full buildout of the 2016 Master Plan has been estimated to be approximately 2% above the current consumption rate (VA, 2018c). This increased utilization rate can be supported by SoCalGas without causing an adverse impact on service quality to other customers outside of the WLAMC. Therefore, cumulative impacts on the natural gas utility would remain at less-than-significant adverse levels.

3.15.2.2 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 less-than-significant adverse levels.

3.15.2.3 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 traffic impacts. Mitigation for these traffic impacts is currently addressed in the Draft PEIS published for comment in December 2018 (VA, 2018c).

3.15.3 Effects of Cumulative Actions on the No Action Alternative

Under the No Action alternative, VA would not rehabilitate and repurpose Buildings 205, 207, and 208 as permanent supportive housing for Veterans at risk of becoming or are homeless in the GLAHS service area. Instead, the buildings would remain vacant and underutilized, and 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.

Additionally, 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 would be positively perceived by the public.

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

4. AGENCY COORDINATION AND PUBLIC INVOLVEMENT

4.1 Draft EA

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 the Draft EA.

4.1.1 Federal, State, and Local Agency Coordination

VA provides federal, state, and local agencies and organizations with an opportunity to comment on the Proposed Action. Specifically, VA 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 starting on November 1, 2018, and ending on December 1, 2018. Additionally, these agencies and organizations were invited to attend and provide comments at a public meeting held at the WLAMC Building 500 auditorium from 6-8 PM on November 13, 2018. A list of stakeholder agencies and a copy of the letter is provided in Appendix B. No comments were received from these agencies during the 30-day review period or public meeting. Prior to the release of the Draft EA, the SHPO provided comments about the Proposed Action through the Section 106 consultation process. As described in Section 3.3, these comments have been incorporated in the Draft EA.

4.1.2 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, VA coordinated 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 provided the opportunity for tribal organizations to provide comments on the Proposed Action during the 30-day review period and to attend the public meeting. No comments were received from tribal organizations during the 30-day comment period or public meeting.

4.1.3 Public Involvement

VA, as the federal proponent of the Proposed Action, made the Draft EA available to the public during the same 30-day review period for regulatory agencies and tribes. The start of the comment period and the process to obtain a copy of the Draft EA was announced in a Notice of Availability (NOA) published on October 31, 2018 and November 3, 2018 in the *Los Angeles Times*, which covers the West Los Angeles region. The NOA explained how to obtain a copy of the Draft EA and where to submit comments during the 30-day review period. The NOA also invited the public to attend the public meeting. Affidavits of publication of the NOA are provided in Appendix C.

As stated in the NOA, the Draft EA was 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 Avenue, Los

Angeles, CA 90024, Phone: (310) 474-1739; West Los Angeles Regional Public Library 11360 Santa Monica Boulevard, Los Angeles, CA 90025, Phone: (310) 575-8323; Donald Bruce Kaufman – Brentwood Public Library, 11820 San Vicente Boulevard, Los Angeles, CA 90049, Phone: (310) 575-8273. Additionally, the Draft EA was available for electronic download from the West Los Angeles Medical Center website at http://westladraftmasterplan.org/documentation.

During the 30-day review period, VA received written comments from the Brentwood Homeowners Association (BHA) on November 29, 2018 (a copy of the comment letter is provided in Appendix C). The BHA comments indicated their strong support for development of the WLAMC for housing and services for homeless Veterans and requested clarification of several issues including: the scope of development analyzed in the EA and its relationship to wider development described in the Draft Master Plan and PEIS; why the Proposed Action involves rehabilitation of Buildings 205, 207, and 208, instead of demolition followed by new construction; and the status of traffic studies and responsibilities for the future road network at the WLAMC. Responses to BHA comments are provided in Appendix C.

4.2 Revised Draft EA

Following the Draft EA 30-day review period, the private entities responsible for rehabilitation of Buildings 205, 207, and 208 determined that several of the original design elements described and analyzed in the Draft EA required the following modifications:

- Increased the approximate number of planned housing units from 172 to 186 by adding 14 more units to Building 207.
- Revised the original plan that called for using electricity as the sole energy source for heating each building, to now also include the natural gas utility, which would decrease costs associated with utilizing a sole energy source and also increase energy efficiency.

The Revised Draft EA included an analysis of these new elements and concluded that these elements would not cause new adverse impacts to the environment or increase the intensity of adverse impacts previously identified in the Draft EA. Additionally, the Revised Draft EA clarified the independent relationship between the Proposed Action and the 2016 Draft Master Plan, addressed BHA comments and responses, and included minor editorial revisions.

In order to inform regulatory agencies, tribes, and the public about these revisions, VA made the Revised Draft EA available for a 15-day review period, announced by the publication of a NOA in the *Los Angeles Times* on March 15 and 18, 2019. The NOA announced the locations where the Revised Draft EA was available, including the 6th Floor of the WLAMC main hospital Building 500, Monday through Friday, 8AM-4PM; Westwood Public Library, 1246 Glendon Avenue, Los Angeles, CA 90024, Phone: (310) 474-1739; West Los Angeles Regional Public Library 11360 Santa Monica Boulevard, Los Angeles, CA 90025, Phone: (310) 575-8323; and Donald Bruce Kaufman – Brentwood Public Library, 11820 San Vicente Boulevard, Los Angeles, CA 90049, Phone: (310) 575-8273. Additionally, the Revised Draft EA was available for electronic download from the West Los Angeles Medical Center website at http://westladraftmasterplan.org/documentation. The NOA indicated that VA accepted comments via email to: VHAGLAMasterPlan@va.gov, or by mail addressed to: VA Greater Los Angeles Healthcare System, Attn: West Los Angeles Campus Environmental Assessment, 11301 Wilshire Boulevard, Bldg. 500/Rm. 6429A, Los Angeles, CA, 90073. No public comments were received. LADOT on April 2, 2019, provided written concurrence with the methodologies and conclusions of the 2019 Transportation Analysis and Addendum, which assumed occupancy of 186 units (a copy of LADOT's comments is provided in Appendix B).

4.3 Final EA and FONSI

The analyses presented in the Draft and Revised Draft EAs provide sufficient evidence and analysis for VA to determine that the Proposed Action would not cause significant environmental impacts on the environmental resources presented herein. Thus, VA concludes that an EIS is not warranted and has prepared a FONSI.

The NOA for the Final EA and FONSI has been published in the *Los Angeles Times*. As stated in the NOA, the Final EA and FONSI is available at the 6th Floor of the WLAMC main hospital Building 500, Monday through Friday, 8AM-4PM; at the Westwood Public Library, 1246 Glendon Avenue, Los Angeles, CA 90024, Phone: (310) 474-1739; at the West Los Angeles Regional Public Library 11360 Santa Monica Boulevard, Los Angeles, CA 90025, Phone: (310) 575-8323; and at the Donald Bruce Kaufman – Brentwood Public Library, 11820 San Vicente Boulevard, Los Angeles, CA 90049, Phone: (310) 575-8273. Additionally, the Final EA and FONSI is available for electronic download from the West Los Angeles Medical Center website at http://westladraftmasterplan.org/documentation. Further information regarding the Final EA and FONSI may be obtained by emailing VHAGLAMasterPlan@va.gov, or by mail addressed to VA Greater Los Angeles Healthcare System, Attn: West Los Angeles Campus Environmental Assessment, 11301 Wilshire Boulevard, Bldg. 500/Rm. 6429A, Los Angeles, CA, 90073.

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.
• Use Tier 4-compliant engines to reduce emissions of particulate matter and nitrogen oxides to meet emission standards established by USEPA and CARB.
• Reduce nitrogen oxides, 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 (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 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 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 ASM 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 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 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 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 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.
• Segregate, contain, and dispose 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 or previously disturbed grounds.
• 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.

6. REGULATORY FRAMEWORK

The Final 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 Final 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 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, Section 438.
- Executive Order 13693, Planning for Federal Sustainability in the Next Decade (19 March 2015).
- Federal Clean Air Act 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 CFR 56260) (30 October 2009).
- Migratory Bird Treaty Act (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 (25 USC 3001 et seq.).
- National Historic Preservation Act of 1966, as amended (36 CFR Part 800).
- South Coast Air Quality Management District Air Quality Regulations.
- USEPA National Emission Standards for Hazardous Air Pollutants .
- 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 a notice of intent 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 SCAQMD 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

Glenn Elliott, Senior PP/M
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K. Hanrahan, MS	Subject-Matter Expert, Document Preparation	5
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
P. Steinberg, PE, LSP	Program Manager, Document Review	25

9. REFERENCES

California Coastal Commission, 2018. Section 307 of the Coastal Zone Management Act; Coastal Zone Maps; and Federal Consistency requirements. Accessed at: https://www.coastal.ca.gov/fedcd/fedcndx.html

California Department of Resources Recycling and Recovery, 2018. California's 2016 Per Capita Disposal Rate Estimate. Accessed at: https://www.calrecycle.ca.gov/lgcentral/goalmeasure/disposalrate/mostrecent

California Geological Survey, 2018. Geologic Hazards Maps. Accessed at: https://maps.conservation.ca.gov/cgs/EQZApp/app/

California Natural Diversity Database, 2017. State & Federally Listed Endangered & Threatened Animals of California. Accessed at https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109405&inline

California Natural Diversity Database, 2017. State and Federally Listed Endangered, Threatened, and Rare Plants of California. Accessed at https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109390&inline

Carl Andrew Castro, Sara Kintzle, Anthony Hassan, 2014. *The State of the American Veteran: The Los Angeles County Veterans Study.* The USC School of Social Work Center for Innovation and Research on Veteran and Military Families. Accessed at: http://cir.usc.edu/wp-content/uploads/2013/10/USC010_CIRLAVetReport_FPpgs.pdf.

Castle-Rose, 2015. Draft Supplemental Environmental Assessment for the Proposed Seismic Upgrade and Rehabilitation of Buildings 205 and 208, dated April 24, 2015.

City of Los Angeles Department of Building and Safety, 2018. Mandatory Retrofit Programs, Ordinance 183893. Accessed at: http://www.ladbs.org/docs/default-source/publications/misc-publications/ordinance_183893.pdf?sfvrsn=6

City of Los Angeles Department of Public Works, 2017. County of Los Angeles: Ballona Creek & Other Urban Watersheds. Accessed at http://www.ladpw.org/wmd/watershed/bc/docs/BallonaCreeketc_wtrshed.pdf

City of Santa Monica, 2006. Westside Water Quality Improvement Project – Sawtelle Channel (SAC). Accessed at https://www.smgov.net/uploadedFiles/Departments/OSE/Categories/Urban_Runoff/Westside_Project_Description2006.pdf

Dibblee, Jr., 1991. Geologic Map of the Beverly Hills and Van Huys (South ½) Quadrangles, Los Angeles County, California. Accessed at https://ngmdb.usgs.gov/mapview/.

Duke Cultural Resources Management, 2014. Duke Cultural Resources Management, LLC, Archaeological Resources Assessment, Department of Veterans Affairs, West Los Angeles Healthcare center, Seismic Corrections Project, VA Project No. 691-406, Los Angeles, California, prepared for the U.S. Department of Veterans Affairs and the Leo A. Daly Company, September 2014.

FEMA, 2008. Flood Map Service Center, FIRM No. 06037C1580F and No. 06037C1590F. Accessed from https://msc.fema.gov/portal/search#searchresultsanchor.

Los Angeles County, 2018. Planning and Zoning Information Map for Unincorporated Los Angeles County, 2018. Accessed at: http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GISNET_Public

LAHSA, 2018. Los Angeles Homeless Services Authority. 2017 Greater Los Angeles Homeless Count – Data Summary: Los Angeles County. Accessed at: https://www.lahsa.org/documents?id=1353-homeless-count-2017-countywide-results.pdf.

Mabbett, 2017. Phase 1 Environment Site Assessment Report for Buildings 205 & 208, West Los Angeles Veterans Affairs Medical Center.

Mabbett, 2018. Phase 1 Environment Site Assessment Report for Building 207, West Los Angeles Veterans Affairs Medical Center.

Mabbett, 2018b. Pers. communication with Mr. Joe Olsen, WLAMC GEMS Coordinator on October 17, 2018.

Millennium Consulting Associates, 2015. Hazardous Material Assessment – Asbestos and Lead Survey Report; West LA Campus.

National Oceanic and Atmospheric Administration (NOAA), 2017. Daily Summary Station Details. Accessed at https://www.ncdc.noaa.gov/cdo-web/datasets/GHCND/stations/GHCND:USW00023174/detail

NEPAssist, 2017. Accessed at https://nepassisttool.epa.gov/nepassist/nepamap.aspx

South Coast Air Quality Management District (SCAQMD), 2017. Off-Road-Model Mobile Source Emission Factors: Year 2018. Access at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/off-road-mobile-source-emission-factors

South Coast Air Quality Management District (SCAQMD), 2018. Title V Permit No. 14966 for VA Greater Los Angeles Healthcare System, 11301 Wilshire Blvd, Los Angeles, CA 90073. Emissions inventory for 2017. Accessed at: http://www3.aqmd.gov/webappl/fim/prog/facility_details.aspx?fac_id=14966

U.S. Census, 2016, 2017. American Community Survey 5-Year Estimates, Los Angeles County, California. Accessed at: https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml

U.S. Department of Housing and Urban Development (HUD), 2017. Part 1: Point-in-Time Estimated of Homelessness. The 2017 Annual Homeless Assessment Report (AHAR) to Congress. December 2017.

U.S. Department of Housing and Urban Development (HUD), 2018. FY 2018 Fair Market Rent Documentation System for Los Angeles County, California. Accessed from https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2018_code/2018summary.odn

U.S. Department of Housing and Urban Development (HUD), 2018b. Overview of HUD-VASH Vouchers. Accessed at: https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/vash

U.S. Department of Housing and Urban Development (HUD), 2018c. HUD Press Release No. 18-027. "HUD, VA Team Up to Help Homeless Veterans Find Permanent Homes." Released April 6, 2018. Accessed at: https://www.hud.gov/press/press_releases_media_advisories/hud_no_18_027

U.S. Department of Veterans Affairs (VA), 2002. Reinspection for Asbestos Containing Materials, VA-GLAHS Buildings 206, 207, and 208, Los Angles, California. November 8 and 15, 2002.

U.S. Department of Veterans Affairs (VA), 2010. NEPA Interim Guidance for Projects. Accessed at https://www.cfm.va.gov/til/etc/NEPAGuidance.pdf

U.S. Department of Veterans Affairs (VA), 2012. Environmental Compliance Management Directive. Accessed at https://www.va.gov/vapubs/viewPublication.asp?Pub_ID=594&FType=2

U.S. Department of Veterans Affairs (VA), 2016. Office of Construction and Facilities Management, Seismic Design Requirements: Document H-18-8, dated October 1, 2016.

U.S. Department of Veterans Affairs (VA), 2016a. Greater Los Angeles Campus Draft Master Plan. January 28, 2016.

U.S. Department of Veterans Affairs (VA), 2017a. VAWLA Site Utility Assessment – Phase 1: Utility Report prepared by Leo A. Daly. January 12. 2017.

U.S. Department of Veterans Affairs (VA), 2017b. November 30, 2017. Personal communication between Mabbett and WLAMC staff during site reconnaissance.

U.S. Department of Veterans Affairs (VA), 2018. Condition of Utilities at the WLAMC.

U.S. Department of Veterans Affairs (VA), 2018a. Building 205, 207, and 208 Transportation Impact Analysis at the WLAMC.

U.S. Department of Veterans Affairs (VA), 2018b. Campus-Wide Transportation Study at the WLAMC.

U.S. Department of Veterans Affairs (VA), 2018c. Draft Programmatic Environmental Impact Statement and National Historic Preservation Act Section 106 Consultation, West Los Angeles Medical Center Campus Proposed Master Plan for Improvements and Reconfiguration. November 2018.

U.S. Department of Veterans Affairs (VA), 2019. Renovation of Buildings 205, 207 and 208, Traffic Impact Analysis Addendum. Available at: http://www.westladraftmasterplan.org/documentation/nepa-and-nhpa.

U.S. Fish & Wildlife Service (USFWS), 2017. National Wetlands Inventory: Wetlands Mapper. Accessed at https://www.fws.gov/wetlands/Data/Mapper.html

U.S. Geological Survey (USGS), 2001. Seismic Images and Fault Relations of the Santa Monica Thrust Fault, West Los Angeles, California: U.S. Geological Survey Open-File Report 01-111, 34 pp., https://pubs.usgs.gov/of/2001/0111/.

U.S. Geological Survey (USGS), 2012. Geological map. Accessed at https://catalog.data.gov/dataset/usgs-us-topo-7-5-minute-map-for-beverly-hills-ca-2012

U.S. Geological Survey (USGS), 2018. U.S. Seismic Design Maps. Accessed at https://earthquake.usgs.gov/designmaps/us/application.php

U.S. Department of Agriculture - Natural Resources Conservation Service (USDA-NRCS), 2017. Soils. Accessed at https://www.nrcs.usda.gov/wps/portal/nrcs/main/ca/soils/

U.S. Department of the Interior (U.S. DOI), 2014. National Park Service; National Register of Historic Places: Supplementary Listing Record. Accessed at https://www.nps.gov/nr/feature/places/pdfs/14000926.pdf.

U.S. Environmental Protection Agency (USEPA), 1995. AP 42, Fifth Edition, Volume 1 Chapter 13.2.3: Heavy Construction Operations. Accessed at https://www3.epa.gov/ttnchie1/ap42/ch13/final/c13s02-3.pdf

U.S. Environmental Protection Agency (USEPA), 2018. California Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants, as of September 18, 2018. Access at: https://www3.epa.gov/airquality/greenbook/anayo_ca.html

Western Regional Climate Center, 2018. Station graph for the Los Angeles International Airport, years 2000-2018. Accessed at https://wrcc.dri.edu/cgi-bin/wea_windrose2.pl

10. GLOSSARY

Sources:

- Army NEPA Glossary, http://aec.army.mil/portals/3/nepa/glossary00.pdf
- 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, PM_{10} and $PM_{2.5}$. 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 1% 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), PM_{10}, $PM_{2.5}$: 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, PM_{10} includes only those particles equal to or less than 10 micrometers (0.0004 inch) in diameter; $PM_{2.5}$ 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 (40 CFR 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.

Tiering: Tiering is a staged approach to NEPA described in CEQ's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR 1500 – 1508). Tiering addresses broad programs and issues analyses, and analyzes site-specific proposals and impacts in subsequent tier studies. The tiered process supports decision-making on issues that are ripe for decision and provides a means to preserve those decisions.

Utility Line: Any item of public or private property which is buried or placed below ground or submerged for use in connection with the storage or conveyance of water, sewage, telecommunications, electric energy, cable television, oil, petroleum products, gas, or other substances, and includes but is not limited to pipes, sewers, combination storm/sanitary sewer systems, conduits, cables, valves, lines, wires, manholes, attachments, and those portions of poles below ground.

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

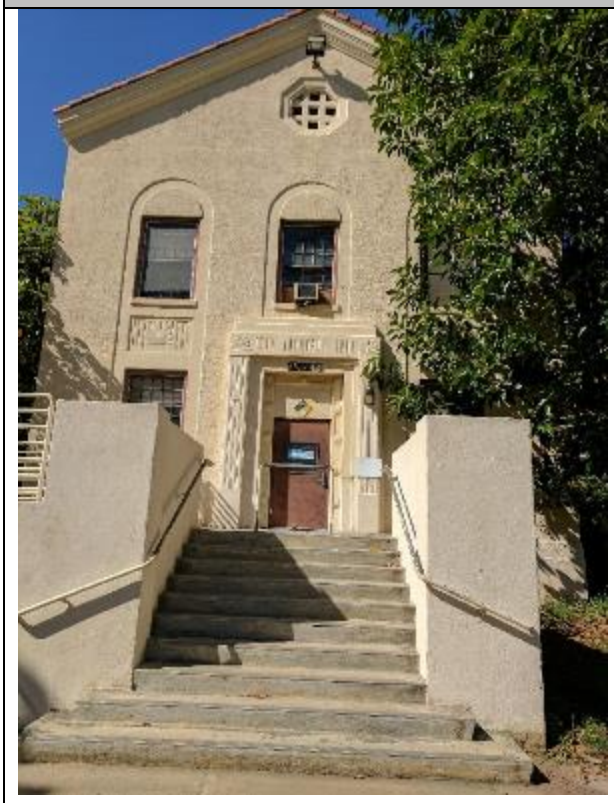
Appendix B – Regulatory Communications

Appendix C – Public Involvement/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

LADOT Comments for Draft Traffic Analysis for the VA Project

From: Eder Romero <eder.romero@lacity.org>
Date: Tuesday, Apr 02, 2019, 5:18 PM
To: Flanz, Meghan Serwin <meghan.serwin@va.gov>
Cc: Hamed Sandoghdar <hamed.sandoghdar@lacity.org>, Elliott, Glenn (CFM) <Glenn.Elliott@va.gov>, mbuckley@concoursefederal.com <mbuckley@concoursefederal.com>, Flanz, Meghan Serwin <meghan.serwin@va.gov>
Subject: [EXTERNAL] Traffic Impact Analysis Review LADOT

Good morning Meghan,

My office has reviewed the Draft Traffic Impact Analysis for the Proposed Renovations at the VA WLA Campus as well as the Draft Addendum Analysis.

DOT agrees with the methodologies and conclusions of the analysis as it relates to the City of Los Angeles. Although we do have minor comments regarding the drafts, our comments will not cause any changes to the conclusions posed within the reports.

Please see the attached PDF for comments to the draft reports that may be taken into consideration by your traffic consultant.

Should you or your traffic consultant have any questions, feel free to contact me via email or telephone.

Thank you.

--

Eder Romero
Transportation Engineering Associate I
West LA / Coastal Development Review

Los Angeles Department of Transportation

LADOT

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1. Intersection #5 within Figure 5(b) has inbound moves that sum to 18% and should sum to 19%.
2. The net trips within Table 1 of the Draft Addendum should be as follows: Daily=(156); AM In=(29), AM Out=4, AM Total=(25); PM In=4, PM Out=(28), PM Total=(24).
3. The LADOT LOS Worksheets should include an Ambient Growth % value of 1.
4. The LADOT LOS Worksheets should not have any Added Volume for the Future W/Project W/ Mitigation column. See intersection #5 AM & PM and intersection #6 AM & PM.
5. Based on peak hour conditions observed at intersections #5 & #6, it is recommended to apply an Override Capacity within the LADOT LOS Worksheets. The appropriate override capacity will likely cause the Level of Service to decrease to E or F, but the project impact should remain unchanged.

DEPARTMENT OF VETERANS AFFAIRS
Greater Los Angeles Healthcare System
11301 Wilshire Boulevard
Los Angeles, CA 90073

In Reply Refer To: 691/00PA

October 30, 2018

West Los Angeles
Healthcare Center
11301 Wilshire Boulevard
Los Angeles, CA 90073
(310) 478-3711

RE: VA West Los Angeles Campus Environmental Assessment for Buildings 205, 207, and 208

The U.S. Department of Veterans Affairs (VA) has prepared a Draft Environmental Assessment (EA) to assess the potential for environmental impacts associated with the VA's Proposed Action to enter into Enhanced-Use Leases (EUL) with private-sector entities to create safe, affordable, permanent supportive housing for veterans and their families who are homeless or at risk of becoming homeless at the VA's West Los Angeles Medical Center (WLAMC), located at 11301 Wilshire Blvd, Los Angeles, California. The WLAMC is part of the VA's Greater Los Angeles Healthcare System. Under these EULs, the private-sector entities would rehabilitate three currently vacant buildings (Buildings 205, 207, and 208) to provide approximately 172 units of housing. The housing will be structured based on the latest homelessness prevention and urban planning sciences, consistent with best practices and evidence-based approaches under the Housing First model. Rehabilitation would include seismic corrections, interior and exterior architectural rehabilitation, and building systems 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 veterans at the WLAMC.

The draft EA has been prepared according to 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), and VA's NEPA implementing regulations (38 CFR Part 26).

The VA invites your organization to provide comments on the draft EA during a 30-day review period, which begins on October 31, 2018. The draft EA is available electronically at http://westladraftmasterplan.com/p/environmentalhistorical and in printed form at 11301 Wilshire Blvd., Building #500 Room #6005 between 8:00AM PST and 4:00PM PST, except Federal holidays. In addition to requesting input from your agency, a Notice of Availability (NOA) of the draft EA will be published in the Los Angeles Times to invite the general public to review and comment on the draft EA

during the 30-day review period. Comments received from your organization and the public will be documented and addressed in the final EA.

Additionally, the VA will hold a public meeting to describe the Proposed Action and the NEPA process while receiving public comment at 11301 Wilshire Blvd., Building #500, Room #1281 at 6:00PM PST on Wednesday, November 14, 2018. The aforementioned NOA will include the meeting information and invite the public to attend. Comments received during the meeting will also be documented and addressed in the final EA.

The VA wishes to take every opportunity to work together in a relationship where a Federal, State, local agency or other stakeholder organization has decision-making authority or special expertise that can enhance VA's decision-making efforts. If you would like to provide comments or request additional information, please contact VHAGLAMasterPlan@va.gov. Comments on the draft EA are respectfully requested no later than December 1, 2018.

Sincerely,

Ann R. Brown, FACHE
Director
Greater Los Angeles Healthcare System

Appendix C – Public Involvement/Comments

BRENTWOOD HOMEOWNERS ASSOCIATION

PO Box 49427 Φ Los Angeles, California 90049 Φ (424) BHA-8765 Φ info@brentwoodhomeowners.org

November 29, 2018

Department of Veteran Affairs
Greater Los Angeles Healthcare System
11301 Wilshire Blvd.
Los Angeles, CA 90073

Email to: VHAGLAMasterPlan@va.gov

RE: 691/00PA
Comments on the VA West Los Angeles Campus Draft Environmental Assessment for Buildings 205, 207 and 208

The Brentwood Homeowners Association (BHA) represents 3,000 single-family homes in the area north and west of the north campus of the WLAMC. We strongly support the development of the VA campus for permanent supportive housing and services for homeless Veterans. The 4,800 homeless Veterans in Los Angeles deserve everyone's efforts to turn this situation around.

We have several comments and questions that we would like addressed.

The decision to establish a principal developer is expected to expedite the renovation of the EULs, which we support. However, the identification of property to be leased is open-ended. The development includes Bldg. 207 "and the development and re-use of other existing buildings and parcels located …"

- The specifics of "other existing buildings and parcels" needs to be defined along with a proposed development timeline.

- Given the seismic condition and historical designation of Bldg. 207, why spend more money, and possibly more time, to retrofit than it would cost to build new? (Parcel 10 was identified last year as new construction and next up for initial-phase development.)

The notice says: "consistent with the framework Draft Master Plan dated January 28, 2016." The Master Plan requires a EIS/EIR and this has not been completed. Most importantly for the surrounding community, there is no Traffic Report nor approved road network on the campus.

- Will the Principal Developer be charged with finalizing the road network? Are the existing roads surrounding Bldg. 207 and the "other" under review?

- The draft EIS/EIR is expected out in 2019. Will the EUL development of Bldg. 207 and the "other" be incorporated into these studies?

Page 74 refers to a "transportation impact analysis study" but only states a few conclusions without any data. This is insufficient since there is nothing to review, such as the assumptions of the study.

Finally, we need to distinguish the merits of the Proposed Action from the process. Since an EIS/EIR, that includes a study of traffic and parking impacts, is expected shortly, please explain why the environmental review process is being piecemealed with these 3 buildings excluded from the EIS/EIR, and the other development under the Master Plan excluded from the EA? Doesn't the law require an analysis of cumulative impacts from the entire Master Plan project? The applicable law may not be evaded by chopping a large project into smaller pieces that taken individually appear to have a less significant environmental impact. The following excerpt from page 80 illustrates the problem:

[illegible]. 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.

Also, why isn't this a violation of the VA's own stated process since a FAQ on the VA web site said:

"Prior to moving forward with any additional development after Building 209, VA plans to complete further environmental, historic, utilities, and traffic due diligence. VA plans to undertake a Programmatic Environmental Impact Statement (PEIS) for the framework Draft Master Plan of the West Los Angeles Campus."

Thank you in advance for your response.

Sincerely,

Raymond Klein

Raymond Klein
President
Brentwood Homeowners Association

Cc: Ann Brown
Mike Bonin
Ted Lieu

RESPONSE TO COMMENTS ON EA FOR BUILDINGS 205, 207 and 208

Comment #1: The decision to establish a principal developer is expected to expedite the renovation of the EULs, which we support. However, the identification of property to be leased is open-ended. The development includes Bldg. 207 "and the development and re-use of other existing buildings and parcels located …"

- The specifics of "other existing buildings and parcels" needs to be defined along with a proposed development timeline.
- Given the seismic condition and historical designation of Bldg. 207, why spend more money, and possibly more time, to retrofit than it would cost to build new? (Parcel 10 was identified last year as new construction and next up for initial phase development.)

Response #1: This EA analyzes the impacts of renovation of Building 207 by the recently selected principal developer (as well as the renovation of Buildings 205 and 208 by Shangri-La). The development and re-use of other existing buildings and parcels at the WLA Campus by the principal developer is analyzed in the Programmatic Environmental Impact Statement (PEIS) released in December 2018 for comment. Establishing a Principal Developer to address Building 207 as well as additional projects yet to be finalized was done to expedite the provision of housing for homeless Veterans as soon as possible.

Comment #2: The notice says: "consistent with the framework Draft Master Plan dated January 28, 2016." The Master Plan requires a EIS/EIR and this has not been completed. Most importantly for the surrounding community, there is no Traffic Report nor approved road network on the campus.

- Will the Principal Developer be charged with finalizing the road network? Are the existing roads surrounding Bldg. 207 and the "other" under review?
- The draft EIS/EIR is expected out in 2019. Will the EUL development of Bldg. 207 and the "other" be incorporated into these studies?

Response #2: A traffic study was completed for the redevelopment of Buildings 205, 207, and 208. While connected to the Draft Master Plan, the renovation of Buildings 205, 207, and 208 is an independent action for which environmental review may proceed apart from the PEIS. However, a larger traffic study has been completed associated with the PEIS and released in December 2018. The larger traffic study addresses the future traffic conditions for all future projects on campus, including the proposed projects under the PEIS and the redevelopment of Buildings 205, 207, and 208.

Comment #3: Finally, we need to distinguish the merits of the Proposed Action from the process. Since an EIS/EIR, that includes a study of traffic and parking impacts, is expected shortly, please explain why the environmental review process is being piecemealed with these 3 buildings excluded from the EIS/EIR, and the other development under the Master Plan excluded from the EA? Doesn't the law require an analysis of cumulative impacts from the entire Master Plan project? The applicable law may not be evaded by chopping a large project into smaller pieces that taken individually appear to have a less significant environmental impact.

Response #3: The conceptual plan for the renovation of Buildings 205, 207, and 208 was originated in 2013, prior to the Draft Master Plan. Efforts to analyze the environmental and historic impacts of this action were initiated at that time. Following the issuance of the Draft Master Plan in 2016, VA determined the need to develop a PEIS to analyze the environmental and historic impacts of redevelopment actions under the Draft Master Plan that had not otherwise been analyzed to date.

While connected to the Draft Master Plan, the renovation of Buildings 205, 207, and 208 is an independent action for which environmental review may proceed apart from the PEIS. This supports VA's interest in providing housing for homeless Veterans as soon as possible. Nonetheless, the EA and PEIS are interrelated documents. The PEIS identifies and evaluates the cumulative impacts of all Draft Master Plan actions, including the renovations of Buildings 205, 207, and 208.

NOTICE OF AVAILABILITY
FINAL ENVIRONMENTAL ASSESSMENT and FINDING OF NO SIGNIFICANT IMPACT
FOR 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, CALIFORNIA

The U.S. Department of Veterans Affairs (VA) hereby gives Notice of Availability (NOA) for the Final Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for VA's Proposed Action to enter into Enhanced-Use Leases (EULs) with private-sector entities at VA's West Los Angeles Medical Center (WLAMC), located at 11301 Wilshire Boulevard, Los Angeles, California. Under the EULs, the private-sector entities would rehabilitate three currently underutilized and vacant buildings (Buildings 205, 207, and 208) to provide approximately 186 units of housing. Rehabilitation would include seismic corrections, interior and exterior architectural renovations, utility improvements, and building system upgrades.

VA completed a Revised Draft EA that documented the avoidance and management measures for potential environmental impacts associated with implementing the Proposed Action. The Revised Draft EA was released for a 15-day review and comment period from March 15 to March 31, 2019. No comments on the Revised Draft EA were received. Accordingly, VA has completed a Final EA and finding of no significant impact (FONSI). The FONSI concludes that the preparation of an Environmental Impact Statement is not required and completes the NEPA review process for this Proposed Action.

The Final EA and FONSI are available for review online at http://westladraftmasterplan.org/documentation; in print at the WLAMC, 11301 Wilshire Blvd., Building #500, Room #6005 between 8:00 AM PST and 4:00 PM PST, Monday – Friday, except Federal holidays; at the Westwood Public Library, 1246 Glendon Ave, Los Angeles, CA 90024, Phone: (310) 474-1739; at the West Los Angeles Regional Public Library 11360 Santa Monica Blvd, Los Angeles, CA 90025, Phone: (310) 575-8323; and at the Donald Bruce Kaufman – Brentwood Public Library, 11820 San Vicente Blvd, Los Angeles, CA 90049, Phone: (310) 575-8273. For further information may be requested via email to VHAGLAMasterPlan@va.gov, or by mail to VA Greater Los Angeles Healthcare System, Attn: West Los Angeles Campus Environmental Assessment, 11301 Wilshire Blvd., Bldg. 500/Rm. 6429A, Los Angeles, CA, 90073.

NOTICE OF AVAILABILITY
REVISED DRAFT ENVIRONMENTAL ASSESSMENT
FOR 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, CALIFORNIA

The U.S. Department of Veterans Affairs (VA) hereby gives Notice of Availability (NOA) for the Revised Draft Environmental Assessment (EA) for VA's Proposed Action to enter Enhanced-Use Leases (EULs) with private-sector entities at VA's West Los Angeles Medical Center (WLAMC), located at 11301 Wilshire Boulevard, Los Angeles, California. Under the EULs, the private-sector entities would rehabilitate three currently underutilized and vacant buildings (Buildings 205, 207, and 208) to provide approximately 186 units of housing. Rehabilitation would include seismic corrections, interior and exterior architectural renovations, utility improvements, and building system upgrades. The conceptual plan for this Proposed Action was initiated in 2013 and is consistent with subsequent plans designed to support Veterans in the Greater Los Angeles Healthcare System service area.

VA recently prepared a Draft EA, which was released for a 30-day review and comment period from November 3, 2018, through December 3, 2018. Following this period, elements of the Proposed Action described in the Draft EA were modified by the private-sector entities, including an increase in the number of proposed housing units from 172 to 186, and inclusion of natural gas as an energy source at the three rehabilitated buildings. The Revised Draft EA analyzes these modified elements. The Revised Draft EA has been prepared according to 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), and VA's NEPA implementing regulations (38 CFR Part 26).

Publication of this NOA starts a 15-day review and comment period for the Revised Draft EA. Comments received during this period will be documented and addressed in a Final EA. The Final EA will be used to determine whether to issue a Finding of No Significant Impact or a Notice of Intent to conduct an Environmental Impact Statement.

The Revised Draft EA is available for review online at http://westladraftmasterplan.org/documentation; and in print at the WLAMC, 11301 Wilshire Blvd., Building #500, Room #6005 between 8:00 AM PST and 4:00 PM PST, Monday – Friday, except Federal holidays; at the Westwood Public Library, 1246 Glendon Ave, Los Angeles, CA 90024, Phone: (310) 474-1739; at the West Los Angeles Regional Public Library 11360 Santa Monica Blvd, Los Angeles, CA 90025, Phone: (310) 575-8323; and at the Donald Bruce Kaufman – Brentwood Public Library, 11820 San Vicente Blvd, Los Angeles, CA 90049, Phone: (310) 575-8273. Comments or questions may be submitted via email to VHAGLAMasterPlan@va.gov, or by mail to VA Greater Los Angeles Healthcare System, Attn: West Los Angeles Campus Environmental Assessment, 11301 Wilshire Blvd., Bldg. 500/Rm. 6429A, Los Angeles, CA, 90073.

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Estate Sales

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Legal Notices

NOTICE OF PETITION TO ADMINISTER ESTATE OF HANS KOSTRZEWSKI, ESTATE NO. 18STPB11462

To all heirs, beneficiaries, creditors, and contingent creditors of Hans Kostrzewski and persons who may be otherwise interested in the will or estate, or both: A petition has been filed by Navigators Specialty Insurance Company in the Superior Court of California, County of Los Angeles, requesting that Laurie Kouzes, Professional Fiduciary, be appointed as personal representative to administer the estate of Hans Kostrzewski.

The petition requests authority to administer the estate under the Independent Administration of Estates Act. This will avoid the need to obtain court approval for many actions taken in connection with the estate. However, before taking certain actions, the personal representative will be required to give notice to interested persons unless they have waived notice or have consented to the proposed action. The petition will be granted unless good cause is shown why it should not be.

The petition is set for hearing in Department 29 of the Los Angeles County Superior Court, located at 111 North Hill Street, Los Angeles, California, at 8:30 a.m. on March 26, 2019.

IF YOU OBJECT to the granting of the petition, you should appear at the hearing and state your objections or file written objections with the court before the hearing. Your appearance may be in person or by your attorney.

IF YOU ARE A CREDITOR or a contingent creditor of the deceased, you must file your claim with the court and mail a copy to the personal representative appointed by the court within the later of either (1) four months from the date of first issuance of letters to a general personal representative, as defined in subdivision (b) of Section 58 of the California Probate Code , or (2) 60 days from the date of delivery of the notice to you under Section 9052 of the California Probate Code .

YOU MAY EXAMINE the file kept by the court. If you are interested in the estate, you may request special notice of the filing of an inventory and appraisal of estate assets or of any petition or account as provided in Section 1250 of the California Probate Code .

Chip Cox, Greenan, Peffer, Sallander & Lally, LLP, 2000 Crow Canyon Place, Suite 380, San Ramon, CA 94583, (925) 866-1000, counsel for Navigators Specialty Insurance Company

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Legal Notices

STATE OF WISCONSIN CIRCUIT COURT SAUK COUNTY

Case No.: 2019-CV-000031
Case Code: 30405, Other Real Estate
DEBRA J. CHRISTENSEN, as personal representative of the ESTATE OF BARBARA A. OBOIS 3930 COUNTY ROAD B WISCONSIN DELLS, WI 53965
Plaintiff,
vs.
MARY SAPPHRON OBOIS, personally and as a trustee of the WALTER OBOIS AND BARBARA OBOIS TRUST POST OFFICE BOX 5414 SANTA MONICA, CA 90409, Defendant.
SUMMONS FOR PUBLICATION
THE STATE OF WISCONSIN
To each person named above as a Defendant: You are hereby notified that the Plaintiff named above has filed a lawsuit or other legal action against you. Within forty (40) days of March 8, 2019, you must respond with a written demand for a copy of the Complaint. The demand must be sent or delivered to the Clerk of Circuit Court, whose address is 515 Oak Street, Baraboo, Wisconsin 53913 and to Axley Brynelson, LLP, Plaintiff's attorney, whose address is 2 E. Mifflin Street, P.O. Box 1767, Madison, WI 53701-1767. You may have an attorney help or represent you.
If you do not demand a copy of the Complaint within 40 days, the Court may grant judgment against you for the award of money or other legal action requested in the Complaint, and you may lose your right to object to anything that is or may be incorrect in the Complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.
Dated this 6th day of March, 2019.
AXLEY BRYNELSON, LLP
Electronically signed by Kristin Renee Pierre
Melissa K. Warner, State Bar No. 1038317
Kristin Renee Pierre, State Bar No. 1085499
Attorneys for Plaintiff
2 East Mifflin Street Post Office Box 1767
Madison, WI 53701-1767
Telephone: (608) 257-5661
E-mail: mwarner@axley.com kpierre@axley.com

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Legal Notices

SUMMONS (CITACION JUDICIAL)
Case Number (Numero del Caso): 56-2018-00513151-CU-PA-VTA

NOTICE TO DEFENDANT: (AVISO AL DEMANDADO):
CARMEN ANGUIANO, an indivdual; and DOES 1 through 20, Inclusive

YOU ARE BEING SUED BY PLAINTIFF: (LO ESTA DEMANDANDO EL DEMANDANTE):
HECTOR MONTES, an individual; MANUEL MONTES, an individual; and OLGA LOPEZ, an individual

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web Site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of $10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

¡AVISO! Lo han demandado. Si no responde dentro de 30 dias, la corte puede decider en su contra sin escuchar su version. Lea la informacion a continuacion.

Tiene 30 DIAS DE CALENDARIO despues de que le entreguen esta citacion y papeles legales para presenter una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefonica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y mas informacion en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede mas cerca. Si no puede pagar la cuota de presentacion, pida al secretario de la corte que le de un formulario de exencion de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podra quitar su sueldo, dinero y bienes sin mas advertencia.

The name and address of the court is: (El nombre y direccion de la corte es):
SUPERIOR COURT OF CALIFORNIA, COUNTY OF VENTURA
800 SOUTH VICTORIA AVE
VENTURA, CA 93009

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: (El nombre, la direccion y el numero de telefono del abogado del demandante, o del demandante que no tiene abogado, es):
HARRIS PERSONAL INJURY LAWYERS
1025 FARM HOUSE LANE 2F
SAN LUIS OBISPO, CA 93401
805.544.0100

Date: (Fecha) JUN 08, 2018

MICHAEL D. PLANET Clerk (Secretario)
AMBER RAMIREZ Deputy (Adjunto)

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Business Names

Fictitious Business Name Statement NO.: 2019043074
The following person is doing business as:
Fictitious Business Name(s) FORESIGHT HEALTH 3831 Hughes Ave, Suite 104 Culver City, CA 90232. **Registered Owner** (S): Kohara Realty LLC 18881 San Felipe St Fountain Valley, CA 92708. **Business is conducted by:** a Limited Liability Company. The registrant commenced to transact business under the fictitious business name or names listed above on **09/01/2018**. I declare that all information in this statement is true and correct. (A registrant who declares as true information which he or she knows to be false is guilty of a crime) **REGISTRANT/CORP/LLC NAME:** KOHARA REALTY LLC. **Signature:** EUNICE KOHARA. This statement was filed with the County Clerk of **Los Angeles County** County on February 20, 2019. **NOTICE**- in accordance with subdivision (a)of section 17920 A Fictitious Name Statement generally expires at the end of five years from the date on which it was filed in the office of the County Clerk except, as provided in subdivision (b) of section 17920, where it expires 40 days after any change in the facts set forth in the statement pursuant to section 17913 other than a change in the residence address of a registered owner. A new fictitious business name statement must be filed before the expiration. The filing of this statement does not of itself authorize the use in this state of fictitious business name in violation of the rights of another under federal state or common law (see section 14411 et seq. Business and Professions code). Dean C. Logan Los Angeles County Clerk, Los Angeles County County Clerk. BY: Sookmin Chang, Deputy. Published 2019, March 1, 8, 15, 22.

Legal Notices

NOTICE OF PETITION TO ADMINISTER ESTATE OF:
Leslie Todd
19STPB00985

To all heirs, beneficiaries, creditors, contingent creditors, and persons who may otherwise be interested in the will or estate, or both, of:
Lillian M. Bolanis
A PETITION FOR PROBATE has been filed by **Catherine Keller& Suzanne Todd** in the Superior Court of California, County of **Los Angeles**
THE PETITION FOR PROBATE requests that **Catherine Keller& Suzanne Todd** be appointed as personal representative to administer the estate of the decedent.
THE PETITION requests the decedent's will and codicils, if any, be admitted to probate. The will and any codicils are available for examination in the file kept by the court.
THE PETITION requests authority to administer the estate under the Independent Administration of Estates Act. (This authority will allow the personal representative to take many actions without obtaining court approval. Before taking certain very important actions, however, the personal representative will be required to give notice to interested persons unless they have waived notice or consented to the proposed action.) The independent administration authority will be granted unless an interested person files an objection to the petition and shows good cause why the court should not grant the authority.
A HEARING on the petition will be held on **April 8, 2019 at 8:30 a.m. in Dept. 20** located at **111 North Hill Street Los Angeles, CA 90012**
IF YOU OBJECT to the granting of the petition, you should appear at the hearing and state your objections or file written objections with the court before the hearing. Your appearance may be in person or by your attorney.
IF YOU ARE A CREDITOR or contingent creditor of the decedent, you must file your claim with the court and mail a copy to the personal representative appointed by the court within the later of either (1) four months from the date of first issuance of letters to a general personal representative, as defined in section 58(b) of the California Probate Code, or (2) 60 days from the date of mailing or personal delivery to you of a notice under section 9052 of the California Probate Code. Other California statutes and legal authority may affect your rights as a creditor. You may want to consult with an attorney knowledgeable in California law.
YOU MAY EXAMINE the file kept by the court. If you are a person interested in the estate, you may file with the court a Request for Special Notice (form DE-154) of the filing of an inventory and appraisal of estate assets or of any petition or account as provided in Probate Code section 1250. A Request for Special Notice form is available from the court clerk.
Attorney for petitioner:
Nancy Noel
44694 Monterey Avenue
Palm Desert, CA 92260
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Business Names

Fictitious Business Name Statement NO.: 2019043074
The following person is doing business as:
Fictitious Business Name(s) FORESIGHT HEALTH 3831 Hughes Ave, Suite 104 Culver City, CA 90232. **Registered Owner** (S): Kohara Realty LLC 18881 San Felipe St Fountain Valley, CA 92708. **Business is conducted by:** a Limited Liability Company. The registrant commenced to transact business under the fictitious business name or names listed above on **09/01/2018**. I declare that all information in this statement is true and correct. (A registrant who declares as true information which he or she knows to be false is guilty of a crime) **REGISTRANT/CORP/LLC NAME:** KOHARA REALTY LLC. **Signature:** EUNICE KOHARA. This statement was filed with the County Clerk of **Los Angeles County** County on February 20, 2019. **NOTICE**- in accordance with subdivision (a)of section 17920 A Fictitious Name Statement generally expires at the end of five years from the date on which it was filed in the office of the County Clerk except, as provided in subdivision (b) of section 17920, where it expires 40 days after any change in the facts set forth in the statement pursuant to section 17913 other than a change in the residence address of a registered owner. A new fictitious business name statement must be filed before the expiration. The filing of this statement does not of itself authorize the use in this state of fictitious business name in violation of the rights of another under federal state or common law (see section 14411 et seq. Business and Professions code). Dean C. Logan Los Angeles County Clerk, Los Angeles County County Clerk. BY: Sookmin Chang, Deputy. Published 2019, March 1, 8, 15, 22.

Legal Notices

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Leslie Todd
19STPB00985

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Lillian M. Bolanis
A PETITION FOR PROBATE has been filed by **Catherine Keller& Suzanne Todd** in the Superior Court of California, County of **Los Angeles**
THE PETITION FOR PROBATE requests that **Catherine Keller& Suzanne Todd** be appointed as personal representative to administer the estate of the decedent.
THE PETITION requests the decedent's will and codicils, if any, be admitted to probate. The will and any codicils are available for examination in the file kept by the court.
THE PETITION requests authority to administer the estate under the Independent Administration of Estates Act. (This authority will allow the personal representative to take many actions without obtaining court approval. Before taking certain very important actions, however, the personal representative will be required to give notice to interested persons unless they have waived notice or consented to the proposed action.) The independent administration authority will be granted unless an interested person files an objection to the petition and shows good cause why the court should not grant the authority.
A HEARING on the petition will be held on **April 8, 2019 at 8:30 a.m. in Dept. 20** located at **111 North Hill Street Los Angeles, CA 90012**
IF YOU OBJECT to the granting of the petition, you should appear at the hearing and state your objections or file written objections with the court before the hearing. Your appearance may be in person or by your attorney.
IF YOU ARE A CREDITOR or contingent creditor of the decedent, you must file your claim with the court and mail a copy to the personal representative appointed by the court within the later of either (1) four months from the date of first issuance of letters to a general personal representative, as defined in section 58(b) of the California Probate Code, or (2) 60 days from the date of mailing or personal delivery to you of a notice under section 9052 of the California Probate Code. Other California statutes and legal authority may affect your rights as a creditor. You may want to consult with an attorney knowledgeable in California law.
YOU MAY EXAMINE the file kept by the court. If you are a person interested in the estate, you may file with the court a Request for Special Notice (form DE-154) of the filing of an inventory and appraisal of estate assets or of any petition or account as provided in Probate Code section 1250. A Request for Special Notice form is available from the court clerk.
Attorney for petitioner:
Nancy Noel
44694 Monterey Avenue
Palm Desert, CA 92260
760-346-8817
Published LA Times

Miscellaneous Merchandise

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NOTICE OF AVAILABILITY REVISED DRAFT ENVIRONMENTAL ASSESSMENT FOR 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, CALIFORNIA

The U.S. Department of Veterans Affairs (VA) hereby gives Notice of Availability (NOA) for the Revised Draft Environmental Assessment (EA) for VA's Proposed Action to enter Enhanced-Use Leases (EULs) with private-sector entities at VA's West Los Angeles Medical Center (WLAMC), located at 11301 Wilshire Boulevard, Los Angeles, California. Under the EULs, the private-sector entities would rehabilitate three currently underutilized and vacant buildings (Buildings 205, 207, and 208) to provide approximately 186 units of housing. Rehabilitation would include seismic corrections, interior and exterior architectural renovations, utility improvements, and building system upgrades. The conceptual plan for this Proposed Action was initiated in 2013 and is consistent with subsequent plans designed to support Veterans in the Greater Los Angeles Healthcare System service area.

VA recently prepared a Draft EA, which was released for a 30-day review and comment period from November 3, 2018, through December 3, 2018. Following this period, elements of the Proposed Action described in the Draft EA were modified by the private-sector entities, including an increase in the number of proposed housing units from 172 to 186, and inclusion of natural gas as an energy source at the three rehabilitated buildings. The Revised Draft EA analyzes these modified elements. The Revised Draft EA has been prepared according to 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), and VA's NEPA implementing regulations (38 CFR Part 26). Publication of this NOA starts a 15-day review and comment period for the Revised Draft EA. Comments received during this period will be documented and addressed in a Final EA. The Final EA will be used to determine whether to issue a Finding of No Significant Impact or a Notice of Intent to conduct an Environmental Impact Statement.

The Revised Draft EA is available for review online at http://westladraftmasterplan.org/documentation; and in print at the WLAMC, 11301 Wilshire Blvd., Building #500, Room #6005 between 8:00 AM PST and 4:00 PM PST, Monday – Friday, except Federal holidays; at the Westwood Public Library, 1246 Glendon Ave, Los Angeles, CA 90024, Phone: (310) 474-1739; at the West Los Angeles Regional Public Library 11360 Santa Monica Blvd, Los Angeles, CA 90025, Phone: (310) 575-8323; and at the Donald Bruce Kaufman – Brentwood Public Library, 11820 San Vicente Blvd, Los Angeles, CA 90049, Phone: (310) 575-8273. Comments or questions may be submitted via email to VHAGLA-MasterPlan@va.gov, or by mail to VA Greater Los Angeles Healthcare System, Attn: West Los Angeles Campus Environmental Assessment, 11301 Wilshire Blvd., Bldg. 500/Rm. 6429A, Los Angeles, CA, 90073.

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Request for Proposal Solicitation
Solicitation No.: AAA-SSP-1920 RFP
Services: Supportive Services Program

Release Date: Friday, March 15, 2019

Mandatory Proposers' Conference:
Friday, March 29, 2019 from 10:00 a.m. - 12:00 p.m. (noon) Pacific Time
(or until all questions have been answered, whichever occurs first)
WDACS
3175 West 6th Street, Room 105
Los Angeles, CA 90020-1708

Proposal Due Date/Time: Monday, April 15, 2019 at 12:00 p.m. (noon) Pacific Time

Additional details are available online:
https://wdacs.lacounty.gov/doing-business-with-wdacs/rfp_/
Direct all questions to:
aaarfp@wdacs.lacounty.gov
Internet access is available at County libraries.
CN958449 03-15-19 Mar 15, 2019

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JUMBLE

Unscramble these Jumbles, one letter to each square, to form four ordinary words.

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OSTUC
ENAWOP
NAMEHU

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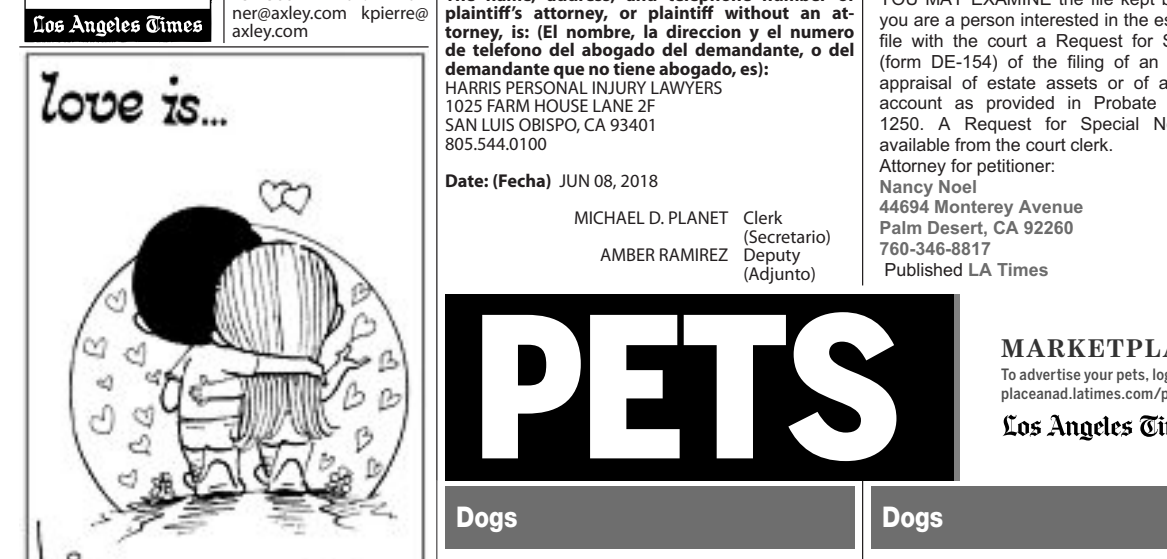
THAT SCRAMBLED WORD GAME
By David L. Hoyt and Jeff Knurek

Now arrange the circled letters to form the surprise answer, as suggested by the above cartoon.

◯◯◯◯ THE ◯◯◯◯ ◯◯◯◯◯

(Answers tomorrow)

Yesterday's Jumbles: HAVEN FATTY WILDLY SINFUL
Answer: Some people don't believe the Earth is spherical and — FLATLY DENY IT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BUILDINGS 205, 207, and 208
U.S. DEPT VETERANS AFFAIRS GREATER LOS ANGELES HEALTHCARE SYSTEM
WEST LOS ANGELES MEDICAL CENTER, CALIFORNIA

The U.S. Department of Veterans Affairs (VA) hereby gives Notice of Availability (NOA) for the draft Environmental Assessment (EA) for the VA's Proposed Action to enter Enhanced-Use Leases (EULs) with private-sector entities to create safe, affordable, permanent supportive housing for veterans and their families who are homeless or at risk of becoming homeless. The Proposed Action would be implemented at the VA's West Los Angeles Medical Center (WLAMC), located at 11301 Wilshire Blvd, Los Angeles, California. Under the EULs, the private-sector entities would rehabilitate three currently underutilized and vacant buildings (Buildings 205, 207, and 208) to provide approximately 172 units of housing. Rehabilitation would include seismic corrections, interior and exterior architectural renovations, and building system 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.

The draft EA has been prepared according to 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), and VA's NEPA implementing regulations (38 CFR Part 26). This Notice of Availability (NOA) starts a 30-day public comment period. Any substantive comments received will be addressed in the Final EA. After the conclusion of the public comment period, a Finding of No Significant Impact or a Notice of Intent to conduct an Environmental Impact Statement will be issued, as appropriate.

The draft EA is available for review online at http://www.losangeles.va.gov. It is available in print 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 public is invited to attend an informational meeting at which the VA will describe the Proposed Action and the NEPA process and receive public comments. The meeting will be held at the WLAMC, 11301 Wilshire Blvd., Building 500, Room 1281, Los Angeles, CA, 90073 at 6:00PM Pacific Time on Wednesday, November 14, 2018.

All comments on the draft EA are requested by December 1, 2018. Comments or questions may be directed to VHAGLAMasterPlan@va.gov or VA Greater Los Angeles Healthcare System, Attn: West Los Angeles Campus Environmental Assessment, 11301 Wilshire Blvd., Bldg. 500/Rm. 6429K, Los Angeles, CA, 90073.

Los Angeles Times
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PROOF OF PUBLICATION
(2015.5 C.C.P.)

STATE OF ILLINOIS
County of Cook

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the action for which the attached notice was published.

I am a principal clerk of the Los Angeles Times, which was adjudged a newspaper of general circulation on May 21, 1952, Cases 598599 for the City of Los Angeles, County of Los Angeles, and State of California. Attached to this Affidavit is a true and complete copy as was printed and published on the following date(s):

Nov 03, 2018; Oct 31, 2018

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated at Chicago, Illinois
on this 3 day of Nov, 2018.

[signature]

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The draft EA has been prepared according to the National Environmental Policy Act of 1969, (NEPA), 42 United

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