



December 7, 2015

Submitted Electronically

Director, Regulations Management (O2REG)
Department of Veterans Affairs
810 Vermont Avenue
Room 1068
Washington, D.C. 20420

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RE: Notice, Preliminary Draft Final Master Plan (West Los Angeles Campus)

Dear Director,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the West Los Angeles Veterans Affairs Draft Final Master Plan. The Conservancy has previously supported efforts to revitalize and rehabilitate the West L.A. Campus, having most recently reviewed the adaptive reuse project for Buildings 205, 208, and 209. We appreciate VA's pursuit of an ambitious master plan with a strong historic preservation component, including the identification of the potential West Los Angeles VA Historic District, which is eligible for the National Register of Historic Places.

Nonetheless, we do have some outstanding questions and concerns over the potential impacts to historic resources on the West L.A. Campus, including the environmental review process and compliance with the National Environmental Policy Act (NEPA), National Historic Preservation (NHPA), and the California Environmental Quality Act (CEQA). We strongly recommend that VA adjust its timeline in order to accomplish its due diligence with respect to historic preservation and to streamline its environmental review process. As we state below, we request to be made a "consulting party" under Section 106 of the NHPA at this time.

We value the Draft Master Plan's stated goal of "revitaliz[ing] the West Los Angeles VA campus to support and honor Veterans" and believe that the development of a thoughtful Historic Preservation Plan, with input from



interested parties, is part and parcel to achieving this outcome and setting a model standard for other VA campuses.

I. Final Master Plan should comply with state and federal regulations for historic preservation

Although the Draft Master Plan includes a detailed framework for managing the campus' rich collection of historic resources, we are concerned that compliance with NEPA and NHPA prior to the release of the plan has been inadequate and insufficiently timed. Both NEPA and NHPA require that compliance be undertaken at "the earliest possible time" and the "earliest stages of project planning," and yet the plan indicates that environmental and historic preservation due diligence will take place at a time "to be determined."

We strongly urge VA to initiate the required consultation under NEPA and Section 106 of the NHPA with interested parties as soon as possible in order to ensure that that the public has the opportunity to comment specifically on the potential impact that the Master Plan could have on historic resources. Moving forward with the consultation process after the release of the second draft of the Master Plan is not in compliance with Section 106 requirements and inhibits VA's ability to work with stakeholders to avoid, minimize, or mitigate potential adverse effects.

At this time, the Conservancy would like to officially participate actively in the review process, as a formal "consulting party" under Section 106 of the National Historic Preservation Act (NHPA), pursuant to 36 C.F.R. § 800.2©(5) and 800.3(f). We would like to gain a greater understanding of the potential impacts and alternatives that are being explored.

Furthermore, we request clarification with respect to the CEQA process for the Draft Master Plan prior to its adoption and its timing for initiation. In addition to compliance with NEPA and NHPA, VA should analyze potential significant impacts on historical resources at the West L.A. Campus under CEQA, including the potential West Los Angeles VA Historic District, as well as the designated Wadsworth Chapel and Trolley Depot.

A key policy under CEQA is the lead agency's duty to "take all action necessary to provide the people of this state with... historic environmental qualities...and preserve for future generations...examples of major periods of California history."¹ To this end, CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."² Compliance

¹ Public Resources Code §21001 (b), (c).

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; *also see* PRC §§ 21002, 21002.1.



with CEQA may include a thorough examination of preservation alternatives through the preparation of an Environmental Impact Report (EIR). Substantial adverse changes, or significant impacts, may include demolition, destruction, relocation, or alteration.

The Final Master Plan should address and mitigate any potential adverse impacts that could jeopardize the eligibility of known historical resources for the National Register, including demolition, new and infill construction, and the proposed relocation of two contributing properties (Buildings 66 and 199) to nearby receiver sites.

II. Final Master Plan should include detailed historic preservation plan and design guidelines for sensitive new construction

We understand that the VA has retained Chattel, Inc. to prepare a comprehensive, campus-wide Historic Preservation Plan to guide the implementation of the Final Master Plan, and we appreciate that this effort is currently underway. While the Draft Master Plan provides a series of general recommendations for avoiding adverse effects on historic resources, we strongly urge the VA to fully integrate the forthcoming Historic Preservation Plan into the Final Master Plan, following consultation with interested parties.

The Historic Preservation Plan should assess the existing conditions of all known historic resources and establish clear treatment and maintenance guidelines. While the project only proposes the demolition of one contributing property (Building 236) at this time, it does propose relocating Buildings 66 and 199, which are both district contributors. In addition to treatment standards, the preservation plan should identify the receiver sites for these properties and demonstrate how they will be stabilized before, during, and after the move.

The Draft Master Plan does establish a sound path for ensuring that historic properties and elements are treated and reused in a manner consistent with the *Secretary of the Interior's Standards for Rehabilitation*, including the recommendation that a qualified preservation professional review and monitor the project at each stage of development. The breadth of the Master Plan, however, necessitates the adoption of a detailed plan for preservation, including the creation of a timeline for implementation and strategies for securing and/or stabilizing vacant buildings before work begins.

In particular, we emphasize the need to secure the National Register-listed Wadsworth Chapel (Building 20). We have previously raised concerns regarding the building's rapid deterioration, and we have learned that it is not currently secured with homeless repeatedly gaining access. While we press for immediate action to protect and stabilize the Wadsworth Chapel, we strongly



encourage VA to outline a clear path for rehabilitating or restoring the building and incorporating it into the revitalized campus master plan.

Given the amount of new construction that is anticipated, the Historic Preservation Plan should also incorporate clear design guidelines for new construction within the potential historic district, building on the recommendations in the Draft Master Plan regarding site selection, compatible additions, and overall scale and character. In order to maintain the eligibility of the district, the Final Master Plan should establish strong, specific standards regarding scale, mass, height, fenestration, and building materials.

The National Park Service provides greater guidance in regards to the *Standards* and how to incorporate compatible new construction, specifically stating: “[I]ntroducing a new building or landscape feature that is out of scale or otherwise inappropriate to the setting’s historic character” is not recommended. The preservation plan should set explicit guidelines regulating height, design elements, and overall building proportions for new construction, ensuring sensitivity towards contributing buildings, structures, objects, landscapes, streetscapes, and site plan elements.

About the Los Angeles Conservancy

The Conservancy is the largest local historic preservation organization in the United States, with over 6,000 members. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Because of the Conservancy’s knowledge and concern about the historic property potentially affected by this project, we believe we can provide important information and a valuable perspective as a consulting party under Section 106.

Please include me as the point person for the Conservancy in your distribution list for all public notices of any meetings, including those for consulting parties, and for the circulation of any documents for comment. All correspondence should be sent to:

Adrian Scott Fine
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afine@laconservancy.org
213-430-4203



Thank you and I look forward to participating as the review and consultation process moves ahead on this project.

Sincerely,

A handwritten signature in black ink that reads "Adrian Scott Fine". The signature is written in a cursive, slightly slanted style.

Adrian Scott Fine
Director of Advocacy

cc: Advisory Council on Historic Preservation
Congressman Ted Lieu
Mayor Eric Garcetti
Councilmember Mike Bonin, District 11
Veterans Affairs Historic Preservation Office
Office of Historic Preservation, State of California
Office of Historic Resources, City of Los Angeles
National Trust for Historic Preservation

